

363 A. The County is proposing the Commission adopt a pilot program for undergrounding
364 500kV powerlines.

365 The pilot program would involve the Commission selecting between three (3) and
366 five (5) pilot projects with the express goal of learning about undergrounding, to support
367 its wider adoption. The County believes that its hybrid underground proposal in this case
368 will make a perfect first project selection in that cohort. The economic component of the
369 pilot program will be addressed by a different County witness in these proceedings.

370 Additionally, the pilot program will include a planning component designed to
371 develop protocols to allow the eventual approval of high-voltage underground transmission
372 lines through local planning processes, including substantial accord review and zoning
373 review. This approval pathway for underground transmission lines is already permitted
374 under state law but is not being utilized at present because planning departments do not
375 have the requisite tools, standards, or experience to review these projects. The pilot
376 program will encourage participating localities to engage in long-term comprehensive
377 planning regarding the placement of high-voltage transmission lines and criteria for
378 underground placement, with the goal of rolling out local approval of underground
379 transmission lines at a later date in the not-too-distant future.

380 While the pilot projects selected by the Commission under the County's proposal
381 will not benefit from local approval themselves, the County's belief is that using the pilot
382 projects to initiate long-term planning of transmission lines, facilitating the creation of local
383 processes for approval of transmission lines, will increase conformity with local
384 comprehensive plans, by syncing up long-term reliability projections with intentional

385 planning. Additionally, local approval of future underground transmission projects will
386 allow them to be placed in service much faster.

387 It is the County's hope that this sort of strategic planning will create the
388 administrative framework for preplanned underground projects to be approved directly by
389 localities. This will save time, money, and discord in the form of repeated public opposition
390 to increasingly frequent transmission line applications.

391 **Q. HOW WOULD THE APPROVAL PROCESS WORK UNDER THE PILOT**
392 **PROGRAM?**

393 A. An existing legal framework already exists for underground transmission line
394 projects to be approved through local planning review. In practice, these processes are
395 unused, with the preferred pathway being an application in the State Corporation
396 Commission. The County envisions a pilot program that, in addition to undergrounding all
397 or part of the pilot project under application, would initiate a long-term planning initiative
398 that would include comprehensive plan reform in the participating locality, to identify
399 future transmission corridors and specific criteria for selecting underground projects, which
400 would be favored in all cases. This will create a basis for Planning Staff and the Planning
401 Commission to review applications for substantial accord with the comprehensive plan and
402 applicable zoning, which can stand in place of Certificate of Public Convenience and
403 Necessity review in the SCC.

404 **Q. WHY IS LOUDOUN COUNTY A SUITABLE LOCALITY TO INITIATE A PILOT**
405 **PROGRAM WITH A PLANNING COMPONENT LIKE YOU ARE DESCRIBING?**

406 A. The County's planning apparatus is among the most sophisticated municipal
407 planning departments you will find and is accustomed to engagement in complex land use

and community development projects. As the county with the highest concentration of data centers in the world, we have an obligation to find solutions to address increased energy demands and proactively develop reliable energy infrastructure. The County is ready and eager to work collaboratively with the Commission and stakeholders to conceptualize a planning and approval process that will get underground lines in service faster, with less time spent waiting for regulatory review. And in the process, more lines are placed underground in corridors designated for such, which will be popular with citizens and in the public interest. In this way, the pilot program benefits citizens in the here and now by undergrounding the pilot project, and in the future by paving the way for faster local approval of future projects.

Q. IS THE COUNTY CURRENTLY WORKING ON COMPREHENSIVE PLAN REFORM RELATED TO ELECTRICAL INFRASTRUCTURE PLACEMENT? CAN YOU ELABORATE?

A. The County has retained an outside consultant and just completed the first phase of a project to identify and map all the existing high-voltage electric transmission corridors in County. The County plans to use the mapping information as a component of a future Comprehensive Plan Amendment (CPAM) to adopt a Countywide map that identifies all the existing high-voltage corridors as a feature shown in the 2019 General Plan. The CPAM will also amend the electrical policies in Chapter 6 of the 2019 General Plan to identify these existing high-voltage transmission corridors as the County's preferred location for the co-location and development of any future high voltage transmission corridors. The CPAM will also include design policies related to techniques to minimize the visual impact of electric transmission corridors on the community.

As I stated previously, this will lay the basis for review of underground transmission line applications for substantial accord with the comprehensive plan.

Q. WHAT IS SUBSTANTIAL ACCORD REVIEW?

A. Based on State Code the County reviews certain applications for public utilities and public service facilities to determine if the general location, character, and extent of the proposed use is in substantial accord with the Comprehensive Plan. The applications, which are referred to as “Commission Permits”, are reviewed through the legislative process by the County’s Planning Commission for conformance with the applicable policies in the 2019 General Plan.

Q. WHAT SORTS OF PROJECTS CURRENTLY UNDERGO SUBSTANTIAL ACCORD REVIEW IN THE COUNTY?

A. Basically any quasi-government use or public utility requires approval through the Commission Permit process. These include Telecommunications Facilities, Public Water and Wastewater Facilities, County Schools, Parks, Libraries, Recreational Facilities, Fire and Rescue Facilities, and Electrical Substations to name a few. Some of these also are identified as requiring Special Exception Approval in the County’s Zoning Ordinance.

Q. SO, THE COUNTY REVIEWS THE PUBLIC UTILITY INFRASTRUCTURE PROJECTS YOU JUST MENTIONED, BUT IT DOES NOT PRESENTLY REVIEW TRANSMISSION LINE APPLICATIONS UNDER THAT SAME REVIEW PROCESS?

A. No, the County does not review proposed high-voltage transmission corridors through the Commission Permit process. The only electrical infrastructure that is reviewed through the

Commission Permit process by the County is electrical substations and electric battery storage facilities.

Q. HOW LONG DOES THE APPLICATION AND SUBSTANTIAL ACCORD REVIEW PROCESS TYPICALLY TAKE?

A. The Commission Permit review process generally takes between six to nine months to complete once the application is accepted by the County, gone through the referral review process by County Departments, and then final action is taken by the Planning Commission and the Board of Supervisors.

Q. HOW LONG, IN YOUR EXPERIENCE, DO TRANSMISSION LINE APPROVAL APPLICATIONS THAT GO THROUGH THE SCC TYPICALLY TAKE?

A. I have only been involved in the initial stages of the review of proposed transmission lines and preparation of comments for Dominion with the County's position. But this process alone can take up to a year or more before the actual SCC filing for the proposed route has occurred.

Q. IN YOUR OPINION, WOULD DIRECTING APPLICATIONS, FOR UNDERGROUND TRANSMISSION LINES IDENTIFIED IN CORRIDORS ON THE COMPREHENSIVE PLAN, THROUGH COUNTY PLANNING, SUBJECT TO SUBSTANTIAL ACCORD REVIEW AND APPLICABLE ZONING, SIGNIFICANTLY SHORTEN THE REGULATORY PROCESS FOR APPROVAL?

A. Without a doubt. The County through the adoption of a Comprehensive Plan Amendment will have already identified existing high-voltage transmission corridors as the preferred location for future high-voltage transmission corridors. Placing underground transmission

475 lines within these corridors mitigates any additional visual impact and should streamline
476 the entire review process.

477 **Q. IN YOUR OPINION, WILL UTILIZING SUBSTANTIAL ACCORD REVIEW AS**
478 **AN ALTERNATIVE PATHWAY TO APPROVAL FOR UNDERGROUND LINES**
479 **INCREASE THE CONFORMITY OF SUCH LINES WITH THE**
480 **COMPREHENSIVE PLAN?**

481 A. Yes, based on the size of the required right-of-way for an underground transmission line
482 these corridors can be incorporated into the existing development pattern throughout the
483 County without the negative visual impact on the community.

484 **Q. DO YOU HAVE ANY FURTHER QUESTIONS?**

485 A. Not at this time.

486 **Q. THANK YOU, MR. GIGLIO, FOR YOUR TESTIMONY.**

487 **Attachments:**

- 488 1) **Exhibit WPG-1 – Resume**
- 489 2) **Exhibit WPG-2 – 2019 General Plan, Chapter 2, Place Types and Quality**
490 **Development Policies**
- 491 3) **Exhibit WPG-3 – 2019 General Plan, Chapter 6, Electrical Policies**
- 492 4) **Exhibit WPG-4 – March 21, 2024, WPG Memorandum to Dominion with Comments**
493 **on Aspen-Golden Line**
- 494 5) **Exhibit WPG-5 – Graphic Showing Aspen-Golden Route Overlaid by Place Types**
495 **from 2019 General Plan**