

July 20, 2026

Mr. Scott Humphrys, Transmission Siting Supervisor
Potomac Edison Company
341 White Pond Drive
Akron Ohio, 44320

Re: Potomac Edison Company Proposed 500 kilovolt (kV) and 138kV Gore-Doubs-Goose Creek Improvement Project, Loudoun County, Virginia, Notice Pursuant to VA Code 15.2-2202 E. (PCOR-2026-0070)

Mr. Humphrys:

Enclosed are Loudoun County's Department of Planning and Zoning comments regarding Potomac Edison Company 500/138kV Gore-Doubs-Goose Creek Improvement Project (Project) located north of the Town of Lovettsville in the northwestern portion of Loudoun County (County) (Figure 1).



Figure 1. Excerpt from [Potomac Edison Interactive Project Map](#) depicting transmission corridor in Loudoun County.

Based on the Project review, the proposed electrical transmission line upgrade is needed to meet current electrical capacity and reliability needs in the region and to comply with mandatory North American Electric Reliability Corporation Standards (Attachment 1). The 10.5-mile segment within the County follows an existing high voltage transmission corridor that originates at the Jefferson County, West Virginia line proximate to Sweet Run State Park and proceeds northwest to the Potomac River and the Frederick County, Maryland line. The Project proposes to reconstruct the existing single-circuit 138kV wooden H-frame towers that are approximately 65-feet tall with double-circuit 500/138kV monopoles that are approximately 185-feet tall. The Project will utilize the existing 150-foot wide transmission corridor right-of-way (ROW) owned by Potomac Edison. The Potomac Edison ROW is paralleled to the south by existing single circuit 500kV lattice towers that are approximately 160-feet tall within an approximate 200-foot ROW owned and operated by Dominion Energy. The Dominion Energy 500 kV lattice towers and ROW are not part of the Project.

County staff reviewed the Project and finds the rebuilding and colocation of new high voltage transmission lines within the existing high voltage transmission corridor minimizes community, visual, and environmental impacts and is supported by the electrical policies in the *Loudoun County 2019 General Plan* (2019 GP).¹ The County offers the following comments on the Project pertaining to land use, environmental impacts, and open space conservation.

COMPREHENSIVE PLAN CONFORMANCE

The County views electrical service as an essential component of daily life and supports the construction of necessary electrical transmission infrastructure to ensure the capacity and reliability of the electrical transmission system to support existing and future business and residential uses.² Specifically, the electrical policies in the 2019 GP call for the County to work with electrical providers to minimize the impacts of transmission corridors and electrical infrastructure through appropriate location, siting and design techniques to ensure compatibility with the surrounding built and natural environment.³

The Project bisects areas in the northwestern portion of the County that are located within the Rural Policy Area (RPA) in an area designated as the Rural North Place Type and the Between the Hills Planning Area.⁴ County policies call for limited residential development within the RPA and emphasize the preservation of farmland, natural, environmental, and heritage resources, open space, and the rural landscape.⁵ The County policies for the RPA outline a strategy for land preservation tied to the creation of a viable rural economy that supports high value agricultural production and the establishment of rural business uses that preserve the rural character of the area. The Rural Economy policies in the 2019 GP identify a variety of business uses that include traditional agricultural enterprise, which in the County include crop and cattle production, the equine industry, breweries, vineyards and wineries, horticulture and specialty farm products, farm markets and wayside stands, hospitality services such as farm-to-table restaurants, bed and breakfasts, banquet/event facilities, rural resorts, and private camps and parks.⁶ The RPA also includes areas of mountainside, river and stream resources, sensitive environmental features, prime agricultural soils, agricultural and forestal districts, open space, and conservation lands that contribute to the rural landscape that are governed by specific policies in the 2019 GP guiding their long-term management and protection.⁷ These resources are important County assets and should be a primary consideration when proposing the development of transmission corridors within the RPA. The Project's use of the exiting transmission ROW limits additional impacts on natural, environmental and heritage resources, agricultural activities, local businesses, and residents living proximate to the transmission corridor.

The County's electrical policies identify rebuilding and colocation within existing high voltage transmission corridors as the County's first preference to expand transmission capacity before

¹ [2019 GP](#), Chapter 6, Electrical, Strategy 6.1

² 2019 GP, Chapter 6, Energy, text

³ 2019 GP, Chapter 6, Electrical, Strategy 6.2

⁴ 2019 GP, Chapter 2, Rural Policy Area Place Types Map

⁵ 2019 GP, Chapter 2, Rural Policy Area, text

⁶ 2019 GP, Chapter 2, Rural Policy Area, text

⁷ 2019 GP, Chapter 3, Natural, Environmental and Heritage Resources, text

considering alternative routing of new transmission corridors.⁸ Construction associated with the Project is planned within the existing 150-foot wide transmission corridor ROW that is maintained by Potomac Edison. The proposed 185-foot monopoles are significantly taller than existing wooden H-frame structures and the adjoining 160-foot lattice towers within the Dominion Energy transmission corridor ROW. The proposed transmission monopoles will be the tallest structures in the vicinity and will have a visual impact on the surrounding properties and rural landscape. While views of the new monopoles will be more pronounced, the overall visual impact is commensurate with the existing nearby lattice towers. Rebuilding and colocating new transmission lines within existing overhead high voltage transmission corridors minimize environmental impacts and the overall visual impact on the surrounding community by grouping these tall structures within an existing and/or expanded transmission corridor ROW.

SUMMARY RECOMMENDATION

County policies support the rebuilding and collocation of the proposed double circuit 500/138kV transmission lines on 185-foot tall monopole structures within the existing ROW as proposed by the Project. The additional 500kV transmission line will assist in meeting regional electric demand while ensuring the structural integrity and reliability of the transmission system. As discussed above, the Project bisects natural, scenic, historic, agricultural, rural business, residential, and conservation lands in northwestern Loudoun that are critical to maintaining the economic vitality and rural character of the area. Future coordination with Potomac Edison is recommended to achieve policy goals related to the preservation of the rural landscape and the protection of environmental and heritage resources outlined in the 2019 GP.

The County recommends that Potomac Edison coordinate with the Department of Planning and Zoning and the County's Natural Resources Team (NRT) to achieve policy goals in the 2019 GP pertaining to the enhancement of environmental features within the ROW and the protection of steep slopes and mountainside areas against destabilization and erosion.⁹ Potomac Edison should commit to a vegetation and habitat management plan which prioritizes native plant species and pollinators in areas not being used for agriculture production to enhance the natural environment, stabilize soils, and provide wildlife habitat within the ROW.¹⁰

The Project bisects numerous properties which are encumbered by conservation and open-space easements held by the County and non-profit land trusts that may restrict certain uses. The County recommends that Potomac Edison coordinate with County staff and non-profit land trusts to ensure that any conflicts between the Project and the terms of the applicable easements are identified and addressed in the coming months prior to hearings with the Virginia State Corporation Commission (SCC). Early coordination will help ensure that the conservation values protected by these easements are considered as part of project planning, and that any issues are resolved in a manner consistent with the applicable easement terms and in a timely manner.

The County recommends that Potomac Edison work with affected property owners, owner associations, Appalachian Trail Conservancy, Sweet Run State Park and the Loudoun County

⁸ 2019 GP, Chapter 6, Electrical, Strategy 6.1

⁹ 2019 GP, Chapter 3, Steep Slopes, Moderately Steep Slopes and Mountainside Areas, Strategy 3.3

¹⁰ 2019 GP, Chapter 3, Plant and Wildlife Habitats, text and 2019 GP, Chapter 6, Electrical, Strategy 6.5 Action D

Department of Parks, Recreation, and Community Services to identify and develop a passive trail system within the ROW, and where appropriate, to link communities, recreational amenities, and natural areas as outlined in the County's Linear Parks and Trail (LPAT) System Plan.¹¹ The LPAT and 2019 GP support the development of a publicly accessible multi-use trail network which links private and public land as part of a larger countywide interconnected trail system.¹²

The County recommends that Potomac Edison continue working with all affected parties to achieve policy goals outlined in the 2019 GP to provide additional electrical infrastructure while protecting natural, environmental and heritage resources, the rural character, the economic viability of rural business, and quality of life of residents of western Loudoun.

If you have any questions regarding these comments, please contact Pat Giglio, Senior Planner, Loudoun County Department of Planning and Zoning, at 571-627-8068 or patrick.giglio@loudoun.gov.

Thank you for the opportunity to provide comments.

Sincerely,



Daniel Galindo, Director
Department of Planning and Zoning

cc: via email only
Tim Hemstreet, County Administrator
Joe Kroboth, III, PE, Deputy County Administrator
Leo Rogers, County Attorney
Steve Torpy, Director, Parks, Recreation, and Community Services
Betsy Smith, Director, Building and Development
Dan Tompkins, Director of Project Engagement and Outreach, First Energy

Enclosure: Attachment 1. Potomac Edison request for comments Gore-Doubs-Goose Creek Improvement Project, date July 9, 2026.

¹¹ [Loudoun County-Linear Parks and Trails System- A Countywide Plan](#)

¹² 2019 GP, Chapter 3, Rural Economy, Action 3.2.F

Attachment 1



341 White Pond Drive
Akron, Ohio 44320

July 9, 2026

Daniel Galindo, Director
Loudoun County Department of Planning and Zoning
1 Harrison Street, SE, P.O. Box 7000
Leesburg, VA 20177-7000

Dear Mr. Galindo:

As previously discussed with you and your staff, the Potomac Edison Company ("Potomac Edison"), a subsidiary of FirstEnergy Corp, is proposing to upgrade approximately 44 miles of an existing 138-kV transmission line to create a double-circuit line with 500-kV wires and 138-kV wires (the "Gore-Doubs-Goose Creek Improvements Project" or "Project").

The Project has been awarded by the regional transmission organization, PJM Interconnection, and will upgrade transmission facilities in Clarke, Frederick, and Loudoun counties, Virginia, and Jefferson County, West Virginia. It will primarily use existing rights-of-way, minimizing environmental and community impacts.

The Project will enhance transmission system reliability, accommodate growing demand for electricity by residential and commercial customers, and facilitate the connection of new generation sources. The Project will also enhance the flow of electricity across the system for all customers and help address the impact of recent power plant retirements in PJM's service territory.

Potomac Edison is preparing to file an application for a certificate of public convenience and necessity ("CPCN") from the State Corporation Commission. Pursuant to §15.2-2202 of the Virginia Code, Potomac Edison is writing to notify Loudoun County of the proposed Gore-Doubs-Goose Creek Improvements Project in advance of the CPCN filing.

We appreciate our prior discussions and welcome the opportunity to coordinate with your staff and share additional information as needed.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott M. Humphrys".

Scott M. Humphrys
Transmission Siting Supervisor
Transmission and Substation Design
FirstEnergy Service Company