

July 31, 2024

VIA ELECTRONIC MAIL

The PJM Board of Managers
Mark Takahashi, Chairman and
Manu Asthana, PJM President and CEO
PJM Interconnection L.L.C.
2750 Monroe Boulevard
Audubon, Pennsylvania 19408

RE: PJM 2022 Window 3 Upgrades Scope Changes
502 Jct-Woodside-Aspen 500 kV & Doubs Corridor Projects

In summary, I am opposed to the PJM 2022 Window 3 Upgrades Scope Changes 502 Jct-Woodside-Aspen 500 kV & Doubs Corridor Projects:

- the cost has increased by at least 167.48M
- the solution is not within existing rights of way and impacts properties that were previously unaffected by the project - including properties in two counties of a neighboring state as well as a national park not previously effected. (MARL is a greenfield line & the MARL alternative Route is also a greenfield line its just on the other side of town and through a neighboring state.)
- Route 7 is a viable route along a highway easement that has not been adequately considered - it would be both less costly and have much less impact on communities in all three states West Virginia, Virginia and Maryland,

The MARL Alternative Reroute does **not** stay within existing rights of way. I confirmed that personally¹, during the July 9, 2024 TEAC meeting - questioning the statement on page 43 that states "within existing transmission line rights". FirstEnergy stated they would need to expand its existing right of way, including on properties that were previously unaffected by this project.

Expanding an existing right of way is also greenfield siting. It is "greenfield parallel to existing lines" as opposed to "pure greenfield". The scope change also includes an entirely new "pure greenfield" right of way in Maryland to circumvent the congestion at the Doubs substation. It also results in two additional crossings of the C&O Canal trail - the 16th most visited National Park in the Nation with over 5 million visitors a year.²

MARL would not have been submitted for the Mid-Atlantic NIETC if the energy company building it did not intend to take property using eminent domain.

¹ Theresa Ghiorzi July 9th PJM TEAC Meeting attendee, Questions & Answers Question #8/ Answer #8 , Attachment III

² C&O Canal Trust <https://www.canaltrust.org/about-us/about-the-co-canal/>

It is not just PJM TEAC Meeting documents (pg42 of the July 9th Reliability Analysis Update) that is false and misleading:

*"The originally proposed [new right-of way] route **will be rerouted to an alternate route within existing transmission line rights-of-way** along the [existing] Dobbs corridor, containing that rebuilt Dobbs to Goose Creek line and the new Dobbs to Aspen 500 kilovolt lines, resulting in three 500 kV transmission lines within that corridor," PJM Transmission Coordination and Analysis Manager Augustine Caven said.*"³

PJM Transmission Coordination and Analysis Manager Augustine Caven is gas lighting Loudoun County and the other communities impacted by publicly stating the re-route will be within existing rights of way when he is aware **it will not**. If the proposed scope change, "MARL Alternative Route" is approved and built **it will take land by eminent domain**.

PJM and its representatives are refusing to acknowledge the intention to take private property by eminent domain from the property owners along the existing rights of way to build the MARL transmission line.

Further in echoing PJM's falsehoods, our politicians, in addition to proclaiming their successful negotiations with PJM whilst singing a rounding chorus of "How Great I Art", continue to spout the same "existing rights of way" propaganda.⁴

PJM and NextERA say they successfully collaborated with "stakeholders and community members".

*"... PJM Transmission Coordination and Analysis Manager Augustine Caven said. He said the proposed change is the result of **"successful collaboration"** between NextEra and the power providers who own the rights of way, **stakeholders and community members**.*"⁵

NextERA did not site the MARL Transmission line nor create an actual route - I confirmed this at the July 9th PJM TEAC Meeting.⁶ As a point of fact, NextERA did not post maps or hold any open citizen input or citizen feedback meetings at all in Loudoun County:

- no siting maps with routes to comment on,
- no alternate routes presented to the communities,
- no community meetings,
- no comment cards

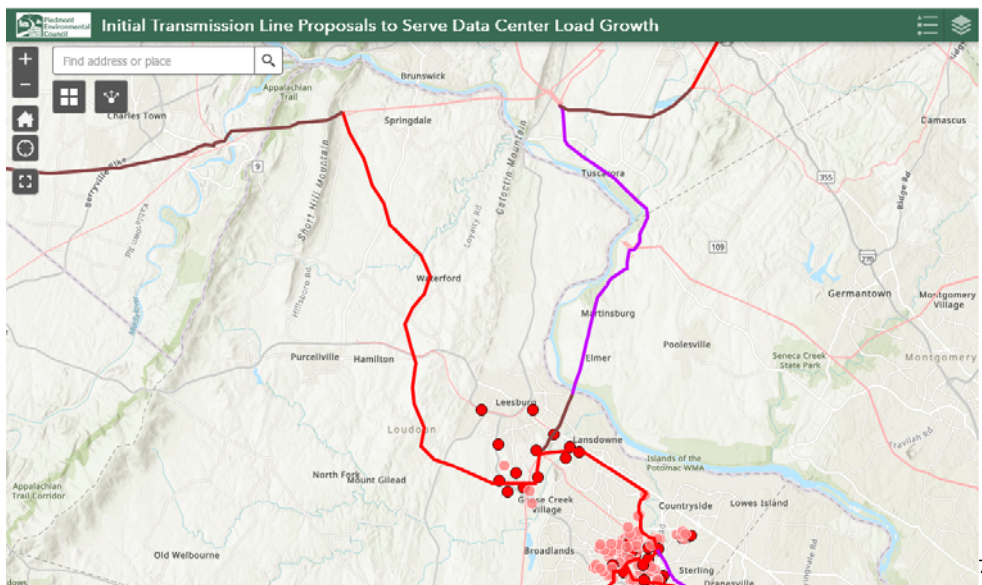
The only "map" presented to the public was the Piedmont Environmental Council's overlay of PJM's chart onto a regional map:

³ Loudoun Times Mirror , "PJM Considers Alternate Route for Western Loudoun Powerline" ; Available here: https://www.loudounnow.com/news/pjm-considers-alternate-route-for-western-loudoun-power-line/article_3faf7494-3e2e-11ef-a865-bb979c92b9ce.html

⁴ Delegate Higgins Press Release July 9, included as Attachment II

⁵ Loudoun Times Mirror , "PJM Considers Alternate Route for Western Loudoun Powerline" available here: https://www.loudounnow.com/news/pjm-considers-alternate-route-for-western-loudoun-power-line/article_3faf7494-3e2e-11ef-a865-bb979c92b9ce.html

⁶ Theresa Ghiorzi July 9th PJM TEAC Meeting attendee, Questions & Answers Question #1/ Answer #1 , Attachment III



No property owners in Loudoun received a notice from NextERA nor did they attend a NextERA citizen feedback session and drill down into a map and see their house / property.

The only community meetings on the transmission line in Loudoun County have been setup and run by the Waterford Foundation, Loudoun Transmission Line Alliance and PEC - these included a "dog and pony" show by a member of the Waterford steering committee, who is not a transmission engineer, on how we just might be able to fit another line on the existing easement. If NextERA representatives were there they did not introduce themselves or speak about project - but apparently "the show" played well enough for them to propose the scope changes.

The only stakeholders and community members whom Augustine Craven and NextERA collaborated with are directly associated with the Piedmont Environmental Council and the Waterford Foundation (the Loudoun Transmission Alliance was founded by the Waterford Foundation), the Loudoun County Board of Supervisors and our state representatives.⁸ The collaboration was done behind closed doors with a tightly curated set of politically connected community groups and elected officials that do not want a transmission line in their view shed or on their property. I personally contacted NextERA and PJM as well as local elected officials⁹ and was not included in the meetings - I live beside the existing transmission easement.

Loudoun County Board of Supervisors passed a resolution without notifying or working with the property owners along the existing Woodside - Doubs transmission lines (nor did they bring it to the attention of their counterparts in Frederick or Montgomery Counties) .

There were very few people providing comment at the public input session for the MARL Transmission Line resolution: https://loudoun.granicus.com/player/clip/7653?view_id=89&redirect=true

⁷ Piedmont Environmental Council Map interactive map available here: <https://www.pecva.org/work/energy-work/initial-transmission-proposals-pec-web-map/>

⁸ Theresa Ghiorzi July 9th PJM TEAC Meeting attendee, Questions & Answers Questions #2,#3,#4,#5,#6/ Answers #2,#3,#4,#5,#6 Attachment III

⁹ Theresa Ghiorzi , some emails to PJM and NextERA concerning the reroute - Attachment IV

- Loudoun Transmission Line Alliance Rep: speaks at 3:37:09 To paraphrase: He is in full support of PJM's plan as long as its not in his back yard ... 1500 individuals and 35 businesses
- A couple speaks at 3:54:39 he says has been to Florida and saw 5, 6, sets of lines in one corridor - it looks messy but at least its messy in just one place
- A Resident of Loudoun speaks at 3:54:39: To paraphrase he has been to Florida and saw 5, 6, sets of lines in one corridor - it looks messy but at least its messy in just one place
- A couple speaks at 3:54:39 he says has been to Florida and saw 5, 6, sets of lines in one corridor - it looks messy but at least its messy in just one place
- A Resident of Loudoun speaks at 3:57:46: To paraphrase she is concerned with the line being in the view shed of historic properties and also the EMFs are bad for health, the lines in Florida are fabulous right on I95
- The Loudoun County Attorney speaks at 5:08:11 and that is followed by the council voting.

On July 5th , the Loudoun Transmission Alliance released an impact study.¹⁰

- This was compiled by property owners, businesses and conservation groups in the area¹¹ who may or may not have been effected if transmission line been sited through that area of western Loudoun County. This is not the type of impact study that is done on a property by property basis along an actual sited route.
- Much of the study pertains to the entire western Loudoun area - including properties along the existing lines - on the other side of town!¹²
- Many of the signing individuals are not affected landowners and **never** would have been personally effected .

"The LTLA is growing as word spreads of the proposed transmission line and - as of May 31, 2024 - is composed of and supported by the following:

- More than 2,200 individuals who have signed the Petition and Declaration – most of whom reside in Rural Loudoun, but many of whom are from -
 - o Eastern Loudoun (e.g, Ashburn, Sterling, and Chantilly), and neighboring areas in Northern Virginia (Alexandria, Arlington, Falls Church, Gainesville, Haymarket, Herndon, Reston, Vienna); and
 - o Nearby states of Maryland, DC, West Virginia, North Carolina, and Pennsylvania; and
- 43 local and regional organizations, multiplied by their thousands of members and employees that are dedicated to business, heritage and ecological preservation, and community management "¹³
- Digging into the petition quite a few of the signers are anonymous¹⁴

¹⁰ Loudoun Transmission Line Alliance Impact Study, Available here: https://www.loudounnow.com/ltla-marl-impact-study/pdf_5927e9a8-3b02-11ef-9b23-dfd96599b8cb.html

¹¹ Loudoun Transmission Line Alliance Impact Study, Page 10; Available here: https://www.loudounnow.com/ltla-marl-impact-study/pdf_5927e9a8-3b02-11ef-9b23-dfd96599b8cb.html

¹² Loudoun Transmission Line Alliance Impact Study, Pages 17-47; Available here: https://www.loudounnow.com/ltla-marl-impact-study/pdf_5927e9a8-3b02-11ef-9b23-dfd96599b8cb.html

¹³ Loudoun Transmission Line Alliance Impact Study, Page 10; Available here: https://www.loudounnow.com/ltla-marl-impact-study/pdf_5927e9a8-3b02-11ef-9b23-dfd96599b8cb.html

¹⁴ Petition available at: <https://www.change.org/p/oppose-500kv-transmission-lines-proposed-through-western-loudoun-and-waterford-nh>

As a point of reference Loudoun County is 520 square miles with 440,071 residents¹⁵.

Everyone in Western Loudoun - including property owners along the existing transmission lines, who live in the Lovettsville area of Western Loudoun, on the other side of town - have exactly the same concerns that their private property will be taken by eminent domain as well as the devastation a 500kv powerline will do to their quality of life as well as what by-right use of their property will be curtailed or destroyed.

- Properties in Loudoun County with existing lines and adjacent to existing lines are not assessed any less by the county than properties with no lines in their view sheds and no lines on their property.
- Private property owners with transmission easements pay property tax on the entire property including the portion under the line(s) which is of limited use - so much for the "by-right" use of private property owners with existing lines
 - FirstEnergy's Transmission Rights-of-Way Restrictions¹⁶ : () prohibit the following items in its easements: buildings, lighting fixtures, signs, billboards, swimming pools, decks, flag posts, sheds, barns, garages, playgrounds, fences or other structures. As well, septic systems, leach beds, and/ or wells are not permitted within a FirstEnergy transmission right-of-way.
 - Expanded easements will undoubtedly run into these structures on adjoining property, requiring their removal. Depending on the size of the lot, it may not be possible to move or reconstruct them on the remainder. Expanding the existing easement will cause considerable damage to host properties.
 - **Obviously, the impact is compounded when there is already a 200' 500kv easement and a 100' 138kv easement**
 - **the properties with lines already have a 300' ROW across them.**
 - **MARL taking another 75' - 100' by eminent domain => 400' wide path of devastation down the side across the middle ...wherever it lands.**
 - **For comparison purposes**
 - **a square acre is 209' x 209'**
 - **a 3 acre property is 361' x 361'**

Energy justice means that you cannot force more and more energy infrastructure on the same people.

No other alternatives except for parallel to the existing transmission lines was looked at per my questioning at the July 9th PJM TEAC even though there is an obvious direct route to Data Center Alley.¹⁷ Data Center Alley in eastern Loudoun County is "approximately 30 square miles - is home to 181 data centers"¹⁸

In his paper, "*Loudoun County Virginia Data Center Capital of the World: A strategy for a changing Paradigm*"

¹⁹ Mike Turner, Ashburn Supervisor Loudoun County Board of Supervisors, concedes that Route 7 is a viable transmission route to "Data Center Alley" that will not involve eminent domain.

¹⁵ Loudoun County Facts and Figures, available at <https://www.loudoun.gov/173/Facts-Figures>

¹⁶ FirstEnergy's Transmission Rights-of-Way Restrictions available here: <https://www.firstenergycorp.com/help/safety/real-estate-power-lines/transmission-right-ofway.html>

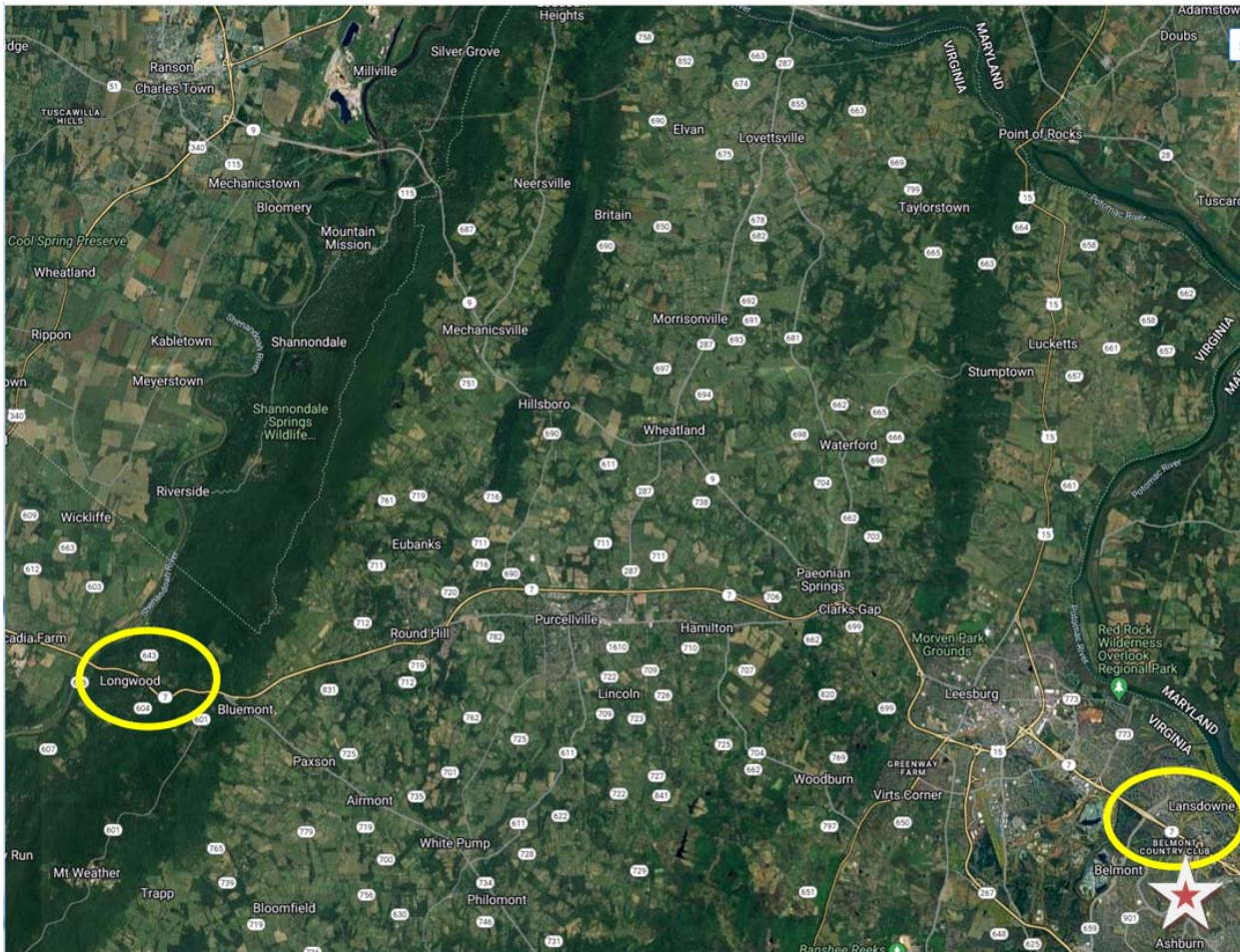
¹⁷ Theresa Ghiorzi July 9th PJM TEAC Meeting attendee, Questions & Answers Question #7/ Answer #7 Attachment III

¹⁸ [Loudoun County Virginia Data Center Capital of the World "A strategy for a changing Paradigm"](#) by Mike Turner, Ashburn Supervisor Loudoun County Board of Supervisors, pg 2; Included as Attachment I

¹⁹ [Loudoun County Virginia Data Center Capital of the World "A strategy for a changing Paradigm"](#) by Mike Turner Included as Attachment I

- "The previously mentioned Aspen/Golden line would run along Rte. 7, a heretofore unthinkable routing Loudoun County Boards for the previous 25 years had sworn would never happen. ..."²⁰
- "...the new Aspen/Golden line proposed along Rte. 7 in the north, a second line down Rte. 7 is probably next up. After that, Dominion will have likely used the last available routing to "Data Center Alley" that won't require using eminent domain."²¹

Route 7 is a viable alternative for siting the MARL transmission line in Loudoun County. It would avoid impacts to far Western Loudoun and would not impact any communities in either Jefferson County, West Virginia or Garret County, Frederick County or Montgomery County in Maryland .



A highway siting along Route 7 would be a much less expensive alternative than the 167.48M alternate MARL route proposed at the July 9th PJM TEAC:

- Route 7 from the Loudoun County boarder directly into data center alley is approximately 43 miles - the siting costs would be less expensive - its a highway easement,
- it would avoid the purchase of hundreds of easements across five counties in three states ,

²⁰ [Loudoun County Virginia Data Center Capital of the World "A strategy for a changing Paradigm"](#) by Mike Turner, pg 13; Included as Attachment I

²¹ [Loudoun County Virginia Data Center Capital of the World "A strategy for a changing Paradigm"](#) by Mike Turner, pg 14; Included as Attachment I

- the materials cost would be less as the route is much shorter than the 167.48M alternate MARL route proposed at the July 9th PJM TEAC
- There is a Route 7 highway easement that crosses the Appalachian Trail. That portion of the Appalachian Trail follows Route 7 for a bit then there is a hazardous pedestrian crossing. A transmission line in that easement is not likely to be a severe impediment to the view shed , if the transmission company added a better trail and pedestrian bridge across Route 7 it would actually be an improvement
- A Route 7 siting would not cross the C&O Canal trail twice

The Loudoun County Board of Supervisors does not have routing authority, siting authority or eminent domain authority, and neither do historical and environmental groups or private citizens - yet they have effectively appropriated this power on behalf of a relatively small subset of unelected politically connected individuals in our community.

PJM claims to not be a routing authority. But PJM did meet with our Loudoun County politicians as did NextERA, and also worked with a curated set of individuals and groups to create a new route for the transmission line.

Once the PJM Board Of Managers indulges the Loudoun County contingency of NIMBYS and assorted carpet baggers and political influencers, without any justification other than political influence and backroom deals, how will PJM turn away a coalition of actual impacted land owners, state politicians and local county supervisors from Jefferson County, West Virginia, Garrett County, Frederick County and Montgomery County in Maryland when they produce a resolution, impacts and request a re-route into Virginia (ie. revert to the December 2023 502 Jct-Woodside-Aspen 500 kV & Doubs Corridor Projects specification) - at a at a cost savings of at least 167.48M ?

If the PJM Board of Managers approves this scope change without a fair evaluation of impacts and costs as was done for the 2022W3 proposals, using the same evaluation criteria including Performance, Scalability, Impact, Validated Cost, Risks, it sets a new precedent.

I therefore urge the PJM Board of Managers **to reject** the PJM 2022 Window 3 Upgrades Scope Changes 502 Jct-Woodside-Aspen 500 kV & Doubs Corridor Projects and open a new window so that solutions for the increasing data center load that minimize the impact to private property owners can be fairly proposed and evaluated.

Sincerely ,

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