

## Comments and Requested Actions on the Department of Energy (DOE) Mid Atlantic National Interest Electric Transmission Corridors (NIETC)

I am writing on behalf of the Citizens for Fauquier County (CFFC). Founded in 1968, CFFC, with over 2,000 members and followers, is the oldest conservation organization in Fauquier County, Virginia.

We are very concerned about the implementation of the Mid Atlantic NIETC, which could have devastating negative impacts on the people of Fauquier County and the conservation values that we uphold: preservation of our rural agricultural economy, scenic, historical, and water resources, and wildlife habitat, among other things.

The Mid Atlantic NIETC was instituted to deal with the enormous amount of energy consumed by data centers, especially in the Northern Virginia area, which contains the world's largest concentration of data centers. Before the data center deluge, electricity consumption was flat in Virginia. For example, Dominion Energy's CEO has said that data centers in the next 15 years are expected to amount to 40% of Dominion's total electric demand in Virginia. In the Commonwealth of Virginia, data center development, without any state oversight or determination of significant impacts of any kind, including implications for the electricity grid, is made by each local governing body focusing on enhancing local revenue. Often, localities hide behind nondisclosure agreements with developers, which shield the impacts of data center development from the public. This is a recipe for disaster for electricity consumers, our economy, and our quality of life in Fauquier County and the Mid-Atlantic region. The DOE and federal government should not encourage misguided, costly, inefficient industries or policies.

We want to draw your attention to three of our most salient objections as follows:

**NIETC Terminus in Fauquier County:** The Mid-Atlantic proposal has transmission lines crossing into and inexplicably ending in northern Fauquier County. The proposed alignment crosses the Rappahannock River, the Appalachian Trail, an Interstate Highway (I-66), and more than one State Highway before abruptly terminating on the rugged and forested terrain of "Fiery Mountain." The terminus sits upon the headwaters of the Rappahannock River, which UVA's Weldon Cooper Center estimates is the primary water source for roughly 300,000 Virginia residents. The endpoint is surrounded by ten permanent conservation easements and 40 parcels in the Agriculture Forestal District, which the County and its residents have protected for generations. The impacted section of Fauquier County contains significant



*The proposed Mid Atlantic NIETC abruptly terminates in northern Fauquier County after crossing the Appalachian Trail, I-66, and the Rappahannock River. The location is at the headwaters of the Rappahannock River and surrounded by 10 conservation easement (yellow) and 40 Agriculture Forestal District members (green).*



economic, historic, and scenic resources. Much of this land is used for agriculture and perpetual conservation easements. Our rural economy could be significantly damaged. ***Beyond the fact that this stub rests on an existing 500 kV Dominion Energy alignment, what is the purpose of this location? How would it bring power to data centers in Prince William and Loudoun Counties without punching a greenfield line through the heart of the densest private conservation area on the East Coast?***

**Adequacy of Stakeholder Dialogue:** The 2023 National Needs Transmission Study aimed to identify and assess electric transmission needs to guide the industry and public in proposing solutions that enhance the power system's reliability, resilience, and efficiency. The study did not determine the National Interest Electric Transmission Corridors; instead, it guided the three-phase methodology, which included explicit requirements for the assessment and communication with all stakeholders of environmental impacts. However, DOE's Grid Deployment Office (GDO) has thus far provided no substantial information on what selection criteria or analysis was used to identify those alignments included in the Mid-Atlantic corridor. According to the NIETC Designation process, Phase One should have concluded with "recommendations on where to designate NIETCs and why" and "Critical public input gained through early and meaningful collaboration with affected states, Tribes, local communities, industry, and stakeholders." ***We respectfully request that the DOE and GDO explain the considerations and selection criteria for the Mid-Atlantic Corridor and that you describe, in detail, the process for assessing the impacts during the balance of Phase 2 and Phase 3.***

Under some conditions, the NIETC could supersede Virginia's State Corporation Commission jurisdiction, leaving Virginia ratepayers, landowners, and taxpayers unrepresented regarding transmission lines' direct costs and other social and environmental impacts. While there is a clear need to improve regional transmission interconnection, we object to this approach, which favors data center and utility profiteering over generations of investments in land conservation and commonsense investments in line efficiency.

Public notification about the intent and methodology of NIETC actions has been significantly inadequate. The level of interaction with landowners, public officials, and civil society organizations must be improved. While we are particularly concerned about the inexplicable intrusion into Fauquier County's fragile headwaters, we are also worried about the relentless approval of more data centers for which there is no (renewable) power. DOE should hold the PJM, its member utilities, and the data center industry more accountable for their actions, which affect us all.

Without a more comprehensive approach that includes transmission-efficient technologies, renewable generation to reflect environmental priorities, and much better attention to the communities and landscapes through which corridors are carved, DOE should anticipate strong and lasting opposition from groups like ours and others.

Please put CFFC and me as President on DOE's list of interested parties so that we have standing to participate in the NIETC process.

**Kevin Ramundo**  
**President, Citizens for Fauquier County**  
**June 23, 2024**