

**From:** Dodson, Regina <[regina.dodson@fauquiercounty.gov](mailto:regina.dodson@fauquiercounty.gov)> **On Behalf Of** Downes, Janelle

**Sent:** Friday, June 21, 2024 3:36 PM

**To:** [NIETC@hq.doe.gov](mailto:NIETC@hq.doe.gov)

**Cc:** DL-BOS <[BoardofSupervisors@fauquiercounty.gov](mailto:BoardofSupervisors@fauquiercounty.gov)>

**Subject:** National Interest Electric Transmission Corridors Comments from Fauquier County, Virginia

The Fauquier County Board of Supervisors, as the elected governing body for Fauquier County, is unanimously providing comments on the Department of Energy's 2024 preliminary designations of National Interest Electric Transmission Corridors from both a local and broader perspective by comments below.

The Mid-Atlantic NIETC proposal includes a transmission line "stub" which extends into the middle of a forested area in Fauquier County, Virginia. While questions have been raised, the Department of Energy has not provided any specific national interest rationale for this stub. We request that the stub be deleted from the NIETC Mid-Atlantic designation. The County has no development plans which would necessitate the stub or the Corridor.

The Board is aware that Loudoun County residents oppose the Mid-Atlantic Resiliency Link (MARL) line through western Loudoun. This line is in DOE's NIETC proposal for the Mid-Atlantic. The Board is concerned that Loudoun opposition may cause the Department of Energy to shift the proposed MARL transmission line to the south and into Fauquier County. We are strongly opposed to such a realignment into Fauquier County. We oppose the shifting of transmission lines that serve neighboring counties' data centers into Fauquier County which would generate significant adverse impacts on Fauquier's scenic beauty, history, and agricultural/tourist economy.

From a broader perspective, the Board has serious concerns about the entire Mid-Atlantic NIETC proposal. It appears to be designed to serve the ever-increasing electric demands of data centers in the northern Virginia area. In addition, current indications are that the data center demand is beyond the plausible capacity of even a large expansion in transmission lines, substations, and new power generation. The Board urges the Department of Energy to withdraw the Mid-Atlantic NIETC proposal and instead undertake a thorough and objective assessment of data center electricity demand based on already built data centers; approved data centers to be built; pending data center proposals that are likely to be approved; and the effect of AI on data center load. An assessment would provide the opportunity for the DOE to clearly outline for the public the magnitude of electrical expansion required and the cost impacts for ratepayers. Further, the Board encourages the Department of Energy to work with Federal Energy Regulatory Commission and State and regional agencies to evaluate the fairness of electricity rate structures. When new "national interest" transmission lines and substations are built, the costs should be allocated to data centers for infrastructure that is predominantly needed for the purpose of serving that data center. Finally, the DOE is encouraged to work with the Federal Energy Regulatory Commission and state regulatory agencies to adopt policies to maximize Grid-Enhancing Technologies (GETS) and advanced reconductoring in an effort to increase delivery of electricity without requiring new transmission lines.

The Fauquier County Board of Supervisors urges DOE to require an applicant/developer to demonstrate that its project proposal was studied and approved through PJM, our independent Regional Transmission Organization's (RTO)/Independent System Operator's (ISO) (collectively, RTO/ISO), tariffed planning processes. The Board believes this well-established, orderly, sequential approach is a necessary prerequisite to establish an appropriate pool of applicable projects to be considered by DOE in determining which projects will best address the Nation's transmission needs.

Fauquier County has for decades exercised prudent and careful land use planning to protect its scenic beauty, its agriculture and tourism-based economy, and its rural, non-industrial character. The Board of Supervisors has adopted policies to carefully limit the number and size of data centers and the impacts on Fauquier County. The Board is united in its opposition to new or expanded transmission lines that would diminish the County's rural character.

The Fauquier County Board of Supervisors appreciates the opportunity to provide comments and formally requests "interested party" status, so that we may continue to participate as the NIETC process proceeds.

Submitted on behalf of the Fauquier County

Board of Supervisors by:

**JANELLE DOWNES, MPA**

**COUNTY ADMINISTRATOR**

---



**FAUQUIER COUNTY GOVERNMENT**

10 Hotel Street, Warrenton, VA 20186

[www.fauquiercounty.gov](http://www.fauquiercounty.gov)

Main Line: 540-422-8001

Direct: 540-422-8003

Mobile: 540-878-7836