



THE COUNTY OF LOUISA, VIRGINIA

June 16, 2026

Valley Link Transmission Company, LLC
Attn: Project Director, Joshua Falls to Yeat 765 kV Transmission Line
Via electronic mail and certified U.S. mail

Re: Written Questions about the Proposed Joshua Falls to Yeat 765 kV Transmission Line

Dear Valley Link:

The Louisa County Board of Supervisors writes before your anticipated application to the Virginia State Corporation Commission for a certificate of public convenience and necessity. On March 16, 2026, the Board adopted Resolution 2026-62 formally opposing the construction of the Joshua Falls to Yeat line in Louisa County. The questions below follow from that resolution and from the County's responsibilities under Title 15.2 of the Code of Virginia for the orderly planning and use of land within its borders and the protection of the health, safety, and welfare of its residents.

We request written responses not later than June 19, 2026, so we can have a productive meeting on June 23, 2026.

Your responses will inform the County's participation in the Commission's proceeding, and the County intends to file them, together with its comments, in that proceeding. We ask that each response be complete, that supporting documents be identified or produced, and that any answer inconsistent with a prior filing or public statement by Valley Link or its parent companies identify the inconsistency and explain it. If you cannot answer a question or produce a requested document, please say so and state the reason.

I. Need and Load Forecasting

1. Your filings before the Federal Energy Regulatory Commission describe the project as a response to accelerated data center load growth in and near the Dominion Zone. Identify each data center project, by name, location, projected in-service date, and committed megawatts, that materially supports the load forecast on which the need for this line rests. For each, state whether the commitment is contractual or forecasted.
2. Identify each data center project reflected in PJM's 2024 RTEP Window 1 load assumptions that has since been cancelled, deferred, downsized, or relocated, and the megawatt change attributable to each. If you have not tracked this, say so.
3. State what portion of the reliability violations the line is intended to resolve would remain if forecasted, non-contracted data center load does not materialize. If you have not performed that

sensitivity analysis, identify who has, or confirm that no one has.

4. PJM selected the project to resolve violations identified in a planning snapshot. Describe the process, if any, by which the continuing need for the line is re-validated against current load data before construction begins, and identify the most recent re-validation.

II. Cost Causation and Allocation

1. The costs of the line will be recovered from ratepayers across PJM, including Louisa County households, rather than from the data center customers whose demand you cite as the reason for the project. Explain how that allocation complies with the principle that costs follow the customers who cause them. Identify any mechanism by which data center operators, rather than residential ratepayers, will bear the costs of this line.
2. State whether any data center developer, hyperscale customer, or large-load customer has executed any agreement committing to fund, in whole or in part, the construction or financing of the line. If none exists, confirm that.
3. If load materializes more slowly than forecast, or does not materialize, state who bears the carrying costs of the line in the interim, and in what proportion.

III. Alternatives Analysis

1. Produce the complete alternatives analysis performed by Valley Link or PJM for the Virginia segment, identifying each alternative evaluated, including co-location with existing transmission, highway, rail, or pipeline corridors, lower-voltage solutions, undergrounding in whole or by segment, non-wires alternatives, and the competing proposals submitted in 2024 RTEP Window 1, together with the scoring criteria, scoring results, and rejection rationale for each. To be clear, the County requests the analyses; it does not request any of these alternatives and its opposition to the project is not conditioned on routing or construction method.
2. Identify each generation alternative evaluated, by you or by PJM, that would resolve the claimed reliability violations by adding generation closer to the load, and the basis on which transmission was found to be the more cost-effective solution. If no comparative analysis of transmission against generation alternatives exists, confirm that.
3. Your PJM proposal was based on guyed-wire and V-lattice structures, which require materially larger footprints than self-supporting structures and which appear poorly suited to the agricultural and residential land they would cross in Louisa County. State whether the cost estimate underlying PJM's selection assumed guyed-wire and V-lattice construction, and provide the revised cost estimate if self-supporting structures are required along the Virginia route.
4. To the extent that the route has been revised since initial landowner notice, provide the current centerline through Louisa County, identify each newly affected parcel, state whether the owners of those parcels have received notice, and state whether further revisions are anticipated before your Commission filing.

IV. Health, Safety, and Public Welfare Studies

1. Identify each study, by author, title, date, and sponsor, on which Valley Link will rely before the Commission concerning electric and magnetic field exposure from 765 kV operation, and produce each. State the calculated magnetic field strength, in milligauss, at the edge of the right-of-way and at 100, 300, and 500 feet from the centerline under normal and peak loading. State whether Valley Link contends that long-term residential exposure at those levels presents no health risk, and the specific scientific basis for that contention.
2. Identify any study, report, or analysis in the possession of Valley Link or its parent companies that reports an adverse association between high-voltage transmission line exposure and human health, livestock health, or agricultural productivity, and produce each. If you decline to produce any such document, identify it and state the basis for withholding it.
3. State the expected audible noise from corona discharge, in decibels, at the edge of the right-of-way under fair and wet conductor conditions, the expected ozone and nitrogen oxide production, and the expected radio and television interference, and identify the studies supporting each figure.
4. Describe the induced voltages and currents the line will produce on fences, buildings, irrigation systems, and farm equipment within and adjacent to the right-of-way; the grounding measures required to protect persons operating tractors, combines, sprayer booms, and other tall equipment under or near the line; who designs, installs, and pays for those measures; and the operating restrictions, if any, that will apply to normal agricultural activity within the right-of-way.
5. State the exposure standard Valley Link applies for residents and workers with active implantable medical devices, including pacemakers and implantable cardioverter defibrillators, the setback or field-strength threshold at which interference becomes possible, and the notice Valley Link will give affected residents. Identify the studies and standards on which you rely.
6. Identify the studies Valley Link will rely on concerning effects of 765 kV operation on pollinators, including honey bee colonies, on livestock, and on avian mortality, and produce each. If no such studies have been identified, confirm that.
7. Describe the risks of conductor failure, ice shedding and galloping, tower failure, and wildfire ignition associated with 765 kV operation in this region, the design standards applied to each, and Valley Link’s emergency response obligations and capabilities in Louisa County, including coordination with County fire and emergency services, which the County notes are substantially volunteer.

V. Project Cost, Financing, and Ratepayer Exposure

1. The estimated cost of the Project Portfolio is approximately \$3 billion. Identify the contingency assumptions, escalation factors, and cost controls, if any, embedded in that estimate, and state whether the estimate is subject to a cap or is recoverable as incurred through your formula rates.

2. FERC granted Valley Link an abandoned plant incentive permitting recovery of 100 percent of prudently incurred costs if the project is abandoned for reasons beyond your control. State the total development costs you project to incur before any state commission rules on a certificate application, and confirm whether you would seek to recover those costs from ratepayers if the Commission denies the certificate.
3. The PATH project followed the same regional planning path, received federal incentives, was never approved by any state, and cost ratepayers roughly \$250 million for a line never built. Identify each respect in which the financial protections for ratepayers on this project differ from those on PATH.
4. Valley Link describes itself as a new entrant facing financing obstacles, while its members are established utilities with investment-grade ratings, existing revenues, and operating histories. State whether any member has declined to guarantee or otherwise support Valley Link’s debt, and why the financing risks of the venture should be priced to ratepayers rather than absorbed by the members who formed it.

VI. Land Use, Agricultural Resources, and County Planning

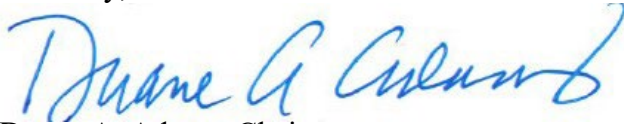
1. Identify each parcel in Louisa County within the proposed right-of-way or any study corridor, including each parcel enrolled in an agricultural and forestal district under Chapter 43 of Title 15.2, each parcel under conservation easement, and each parcel in land-use taxation. State how the route was evaluated against these designations.
2. The Louisa County Comprehensive Plan designates the affected areas for agricultural and rural preservation. Describe each step Valley Link has taken to review the Comprehensive Plan, and state whether you contend the proposed line complies with it. If you contend it is, explain the basis.
3. Provide the studies, if any, assessing the line’s effects on groundwater, wells, streams, and ponds along the Louisa County route, and on the agricultural operations that depend on them. If those studies have not been performed, state when they will be.
4. Identify each historic, architectural, or archaeological resource along the Louisa County route identified to date, the surveys performed or planned, and the status of your coordination with the Virginia Department of Historic Resources. State whether any federal permit you anticipate will require review under Section 106 of the National Historic Preservation Act, and the status of that review.
5. State the assumed right-of-way width through Louisa County, the number of residences within 500 feet of the centerline of any route under study, and the methodology and findings of any property-value impact analysis Valley Link or its affiliates have commissioned or rely on, including any prepared for other proceedings.

VII. Record Consistency

1. Confirm that your responses to these questions reflect the representations made in your filings in FERC Docket Nos. ER25-1633-000 and EL25-77-000, with PJM’s filings concerning the 2024 RTEP Window 1 selection, and with your public statements at community meetings in the affected counties. Identify any respect in which they are not.

The Board and the Planning Commission take seriously their obligations to the residents and landowners of Louisa County, and they expect the same seriousness in your responses. Please direct your reply to the County Administrator, with a copy to the County Attorney.

Sincerely,



Duane A. Adams, Chairman
Louisa County Board of Supervisors