



## COUNTY OF CULPEPER, VIRGINIA BOARD OF SUPERVISORS

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June XX, 2026

PJM Board of Managers  
PJM Interconnection, L.L.C.  
2750 Monroe Boulevard  
Audubon, PA 19403

Re: Joshua Falls–Yeate Scope Change / Culpeper Yeate Substation / 2024 RTEP Window 1

Members of the PJM Board of Managers:

On behalf of the Culpeper County Board of Supervisors, we write regarding the proposed scope change for the Joshua Falls–Yeate 765 kV transmission project and the associated proposed Culpeper Yeate substation.

The Board urges PJM not to approve the proposed scope change in its current form. As currently configured, the project lacks an acceptable terminal site in Culpeper County. On April 7, 2026, the Culpeper County Board of Supervisors adopted a formal resolution opposing the Valley Link Joshua Falls–Yeate 765 kV transmission line and specifically opposing the proposed Yeate substation in the Richardsville area of Culpeper County. That position was restated during the May 19, 2026, meeting with Valley Link representatives.

This opposition is based on specific land use, environmental, historical, agricultural, community, and constructability concerns surrounding the proposed Richardsville-area substation site and the associated 765 kV corridor.

The proposed scope change before PJM is not a minor modification. The April and May 2026 Transmission Expansion Advisory Committee (TEAC) materials reflect substantial revisions to the previously PJM approved configuration, including relocation of the Yeate substation approximately 15 miles south into Culpeper County from its originally contemplated location near Morrisville in Fauquier County, shortening of the proposed 765 kV greenfield corridor, removal of the originally planned 230 kV yard at Yeate, revised 500 kV interconnections, and cancellation or modification of multiple previously approved supporting elements. Those changes confirm that the project remains in flux. They also raise serious questions about whether the revised configuration is feasible, properly scoped, or adequately supported by settled planning assumptions.

The removal of the originally planned 230 kV yard at Yeate is significant because it appears to reduce or eliminate any direct local load-serving function previously associated with the proposed Culpeper site. The Board does not request that this component be restored. Rather, the removal underscores the Board's concern that the revised Culpeper Yeate substation is primarily a regional bulk-transfer facility that Dominion has represented as serving data center load growth in Northern Virginia, not infrastructure

needed to serve local Culpeper County demand. The scope reduction at Yeat reinforces that concern. Culpeper County is already subject to the SCC-approved Culpeper Tech Zone 230 kV transmission project, which Dominion represented as necessary to serve data center load growth and area reliability in Culpeper, Orange, and Fauquier. That project includes new 230 kV infrastructure and related regional upgrades. Given that approved local reliability project, PJM should not approve a separate 765 kV scope change that places a major greenfield bulk-transfer substation in Culpeper while offering no clear local reliability benefit to County residents.

The proposed substation also raises serious future-expansion concerns. Regional Transmission Expansion Plan (RTEP) materials indicate that Yeat has been associated in prior configurations with multiple 765 kV connections and a 230 kV component as part of a broader long-term topology. Although portions of that scope have now been removed or modified, there is concern that approval of a Culpeper Yeat site could establish the foundation for additional future 765 kV loops, reinforcements, or other large-scale industrial transmission infrastructure in the Richardsville area. The currently revised configuration appears to rely on a single 765 kV connection into Yeat. If that connection is critical to regional transfer capability, will future reliability planning later reintroduce additional 765 kV looped infrastructure or reinforcements at Yeat to address redundancy, resilience, or contingency concerns? Culpeper County should not be asked to approve a site that appears limited today, only to become the foundation for a much larger transmission hub later. Such an arrangement is untenable for Culpeper County. The Richardsville area is rural, historically significant, environmentally sensitive, and closely tied to the Rapidan and Rappahannock River landscapes. The public opposition from area residents reflects legitimate concern that this project would permanently alter the character of the community. A 765 kV/500 kV substation on a large greenfield site is not a temporary impact. It is a permanent regional infrastructure node that could shape future land use and future transmission planning for decades.

The Board is also concerned that the current proposal appears to concentrate a major regional transfer function at a single new greenfield terminal location in Culpeper County. If the project is truly required for regional reliability by 2029, PJM should carefully evaluate whether a configuration dependent on a contested greenfield substation site, local land-use approvals, extensive right-of-way acquisition, and likely litigation can reasonably meet that required in-service date. A required in-service date is not the same thing as a feasible construction schedule.

During the May 2026 meeting with Valley Link representatives, Board members asked whether major PJM-approved transmission projects had ever later been canceled. Valley Link representatives responded to the Board that they were not aware of any such examples. The Board raises this issue because that representation is incomplete. PJM-approved projects are not immutable. PJM has previously delayed, revised, or removed major RTEP transmission projects when planning assumptions, timing, or reliability drivers changed. The Potomac-Appalachian Transmission Highline (“PATH”), a proposed 765 kV transmission project, and the Mid-Atlantic Power Pathway (“MAPP”) are examples of major PJM-approved transmission projects that were later removed from the RTEP after further analysis showed the underlying reliability drivers no longer supported the projects within PJM’s planning cycle. Culpeper County raises this point because PJM should not treat prior RTEP selection as a substitute for current feasibility review. Before approving this scope change, PJM should determine whether the revised Joshua Falls–Yeat configuration remains feasible, constructible, and justified given the host county’s formal opposition to the proposed terminal site. The County also notes that Valley Link representatives have stated that alternative electrically viable 500 kV corridor locations farther north could require additional routing through Culpeper County. The Board does not view that as a sufficient basis to approve the current Culpeper Yeat site. PJM should not treat the County’s rural residents as choosing between one unacceptable impact and another. Instead, PJM should require a more complete evaluation of alternatives

that avoid a new greenfield 765 kV terminal site in Culpeper County and maximize existing transmission corridors and infrastructure.

Culpeper County's Comprehensive Plan emphasizes that development of future electrical transmission lines should be limited while meeting the electrical demands of the County, and that expansion within existing transmission line corridors should be the first option pursued. *See* Culpeper County Comprehensive Plan, chapter 7, page 13 The proposed scope change is inconsistent with that planning principle.

For these reasons, the Board respectfully requests that PJM:

1. Decline to approve the proposed Joshua Falls–Yeate scope change in its current form;
2. Defer any PJM Board action until Valley Link/Dominion provide a full explanation of why the project requires a new greenfield terminal substation in Culpeper County;
3. Require a complete analysis of alternatives that do not depend on the proposed Culpeper Yeate substation site, including alternatives using the originally contemplated northern configuration or other existing 500 kV corridors and substations. The Board understands that the Joshua Falls–Yeate project selected in the 2024 RTEP Window 1 process was based on a different landing configuration than the Culpeper Yeate site now proposed. The Board further understands that the Culpeper Yeate landing configuration was presented later through the 2026 TEAC scope-change process, after the original PJM approval. While Dominion has stated that relocating Yeate south shortens the line, reduces costs, and avoids constraints north of the Rappahannock River, the Board cannot discount the significance of local opposition and siting impacts in that relocation decision. The currently proposed Culpeper site faces formal opposition from the host county and substantial public opposition from the Richardsville community. PJM should not approve a scope change that merely transfers unresolved siting conflict from one locality to another.
4. Require a clear explanation of what local reliability benefit, if any, the revised Culpeper Yeate configuration provides to Culpeper County residents after removal of the 230 kV yard;
5. Require disclosure of how the revised configuration interacts with the SCC-approved Culpeper Tech Zone 230 kV project and other approved or proposed regional transmission infrastructure;
6. Require Valley Link/Dominion to explain whether the revised scope remains feasible for the stated 2029 required in-service date, given equipment lead times, permitting, land acquisition, local land-use approvals, and foreseeable litigation;
7. Require Valley Link/Dominion to identify whether the Culpeper Yeate site is intended, or may later be used, to accommodate future 765 kV loops as proposed in existing RTEP documents, additional transmission lines, or other major future infrastructure not included in the current scope change;
8. Enter this letter and the Culpeper County Board's opposition into the materials considered by PJM staff and the PJM Board before any vote on the proposed scope change.

Culpeper County recognizes the importance of reliable electric service and regional transmission planning. However, regional reliability planning must be grounded in realistic siting, constructability, local land-use feasibility, and honest evaluation of impacts. A project that depends on a terminal site already rejected by the host county should not be advanced as though its feasibility is settled.

The proposed Culpeper Yeate substation is not a valid or acceptable landing site for this project. The Culpeper Board of Supervisors requests that PJM not approve the proposed scope change as currently presented.

Sincerely,

Tom Underwood, Chairman  
Culpeper County Board of Supervisors  
Culpeper County, Virginia