

Virginia State Corporation Commission
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October 21, 2025

VIA ELECTRONIC FILING

Mr. Bernard Logan, Clerk
State Corporation Commission
Document Control Center
1300 E. Main Street
Richmond, Virginia 23219

**Re: Application of Virginia Electric and Power Company for approval
and certification of electric transmission facilities: 500 kV and 230 kV
Golden-Mars Lines, Lockridge 230 kV Loop, Sojourner 230 kV Loop
and Related Projects PUR-2025-00056**

Dear Mr. Logan:

Please find enclosed witness testimony Victor Block, Vicky Hu, and the Honorable Joe T. May on behalf of Loudoun Valley Estates Homeowners' Association and witness testimony of Mac Haddow on behalf of the HOA Roundtable.

Thank you for your assistance with this matter. Should you have any questions, please do not hesitate to contact me at your convenience at bturner@marquislawgroup.com or at (703) 669-9090.

Very truly yours,

/s/ Bryan S. Turner

Bryan S. Turner

Cc: Certificate of Service (via email)
Office of Hearing Examiners (via email)

BST: jlc

COMMONWEALTH OF VIRGINIA
STATE CORPORATION COMMISSION

APPLICATION OF VIRGINIA ELECTRIC	)	
AND POWER COMPANY	)	Case No. PUR-2025-00056
	)	
For approval and certification of electric transmission	)	
Facilities: 500 kV and 230 kV Golden-Mars Lines,	)	
Lockridge 230 kV Loop, Sojourner 230 kV Loop, and	)	
Related Projects	)	

DIRECT TESTIMONY OF
VICTOR BLOCK, PRESIDENT OF LOUDOUN VALLEY ESTATES
ON BEHALF OF LOUDOUN VALLEY ESTATES

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October 21, 2025

SUMMARY OF DIRECT TESTIMONY

Witness: Victor Block, President of Loudoun Valley Estates

Respondent: Loudoun Valley Estates, HOA

I am the President of the Loudoun Valley Estates I Homeowners Association (“LVE I”) and a resident of the same. LVE I is the property owners’ association representing 711 homes and more than 3,000 residents whose combined assessed real-estate value exceeds \$750 million.

My direct testimony explains that LVE I is aligned with other respondents, numerous advocacy groups, elected officials, and public witnesses in supporting Loudoun County’s proposal to underground portions of the proposed Golden-to-Mars 500 kV and 230 kV Transmission Line (the “Transmission Line”). Loudoun County’s proposal would underground the Transmission Line beginning with a transition station located at the site of the Mars Substation, traversing underground along one of the County proposed alternative underground routes that ends at a transition station on the property owned by Amazon Data Services, Inc. LVE I believes that Loudoun County’s proposal minimizes adverse impacts to the community.

If the State Corporation Commission (the “Commission”) determines it will not require Virginia Electric and Power Company d/b/a Dominion Energy Virginia (“Dominion” or “the Company”) to underground the Transmission Line, LVE I opposes all above-ground routes proposed by the Company due to the direct, severe, and irreversible impacts they would impose on homeowners, LVE I, and the broader community.

To be clear, LVE I is not opposing infrastructure needed for reliability or economic growth; we support responsible solutions that balance those needs with community protection. We support Loudoun County’s underground proposal because it achieves that balance. However, if the Commission declines to require underground construction, LVE I cannot support any above-ground alternative due to the permanent, disproportionate impacts such routes would impose on existing neighborhoods.

**DIRECT TESTIMONY
OF
VICTOR BLOCK
PRESIDENT OF LOUDOUN VALLEY ESTATES
ON BEHALF OF
LOUDOUN VALLEY ESTATES HOA
BEFORE THE
STATE CORPORATION COMMISSION OF VIRGINIA
CASE NO. PUR-2025-00056**

1 **Q. Please state your name, current position and business address.**

2 A. My name is Victor Block. I am President of Loudoun Valley Estates Homeowners
3 Association (LVE I). My business address is 43636 Lucketts Bridge Circle, Ashburn,
4 Virginia 20148.

5 **Q. Please summarize your background and professional experience.**

6 A. I moved to LVE I in July 2005. I was first elected to the Loudoun Valley Estates
7 Board of Directors in 2025 and began my tenure as President at the same time. I have
8 worked in the technology and media industry for 25 years, including more than 18 years in
9 executive positions. As part of my role as President of the LVE I, I am familiar with the
10 documents referenced throughout my testimony.

11 **Q. What is the purpose of your testimony?**

12 A. The purpose of my testimony is to explain that LVE I is aligned with other
13 respondents and numerous advocacy groups, elected officials, and public witnesses in
14 supporting Loudoun County's proposal to underground portions of the proposed Golden-
15 to-Mars 500 kV and 230 kV Transmission Line.

16 If the State Corporation Commission determines it will not require Virginia Electric
17 and Power Company to underground the Transmission Line, LVE I opposes all above-

ground routes proposed by the Company because of the direct, severe, and irreversible impacts they would impose on homeowners, LVE I, and the broader community as a whole.

Q. What is LVE I?

A. LVE I is a property-owners association comprising all members who own property within Loudoun Valley Estates I. It includes 711 homes and represents more than 3,000 residents whose real-estate assets exceed \$750 million in assessed value.

Q. What is your understanding of Dominion's burden to establish eligibility for approval of the proposed overhead 500 kilovolt ("kV") single circuit transmission line and a new overhead 230 kV single circuit transmission line referred to as the "Golden-Mars Lines"?

A. As a pre-requisite for constructing a 500 kilovolt ("kV") single-circuit transmission line and a new overhead 230 kV single-circuit transmission line, Dominion is required to apply for and receive from the Commission a Certificate of Convenience and Necessity. Va. Code § 56-265.2.

Since the proposed 500 kilovolt ("kV") single-circuit transmission line and a new overhead 230 kV single-circuit transmission line exceed 130 kV, Dominion must also comply with the requirements of Va. Code § 56-46.1.

Under Va. Code § 56-46.1(B), "The Commission is required to consider, upon the request of the governing body of any county or municipality in which the line is proposed to be constructed, (a) the costs and economic benefits likely to result from requiring the underground placement of the line and (b) any potential impediments to timely construction of the line."

1 Pursuant to Va. Code § 56-46.1(D), whenever the Commission is required to approve the
2 construction of any electrical utility facility, it shall give consideration to the effect of that
3 facility on the environment and establish such conditions as may be desirable or necessary
4 to minimize adverse environmental impact.

5 Under Va. Code § 56-46.1(D), the terms "environment" or "environmental" shall be
6 deemed to include in meaning "historic," as well as a consideration of the probable effects
7 of the line on the health and safety of the persons in the area concerned.

8 In reviewing the Application and determining whether the routes contained in the
9 Application will have an adverse environmental impact, the Commission is required to take
10 into consideration the review and opinions of numerous state and local agencies, including,
11 but not limited to, the Department of Environmental Quality, the Marine Resources
12 Commission, the Department of Wildlife Resources, the Department of Historic Resources
13 and the Department of Conservation and Recreation.

14 Taken together, these provisions establish the framework under which my
15 testimony is offered - addressing the environmental, historic, health and safety, and
16 economic factors that the Commission must evaluate.

17 **Q. Can you briefly describe Dominion's proposal for Mars to Golden Transmission**
18 **Line?**

19 A. The Company's proposal includes six alternate above-ground routes ranging from
20 approximately 8.3 to 9.8 miles in length. These routes would place 500-/230-kilovolt
21 transmission towers directly through densely developed residential areas between
22 Dominion's Mars Substation and its Golden Substation in Loudoun County, Virginia.

23 **Q. With which area of the Transmission Line is LVE I specifically concerned?**

A. LVE I is concerned about the entire line and believes it should be installed underground to the greatest extent possible. LVE I is opposed to all overhead construction through residential communities located in place types identified in the 2019 General Plan that were that were never planned or zoned to host industrial-scale utility infrastructure.

Q. What is your understanding of why the new transmission line is deemed necessary by Dominion?

A. My understanding is that the Transmission Line is needed to support the unprecedented expansion of data-center development in Loudoun County.¹ Data centers require extremely high amounts of electricity to allow the data centers to operate continuously. They come with complex infrastructure requirements, including power distribution. In the past 15 years, over 30 million square feet of data centers have been built in Loudoun County.² As Dominion explained in its 2023 Integrated Resource Plan filing, more and more data centers are flocking to Loudoun County:

The company serves the largest data center market in the world, located in 30 square miles of Loudoun County. There are data centers located in other areas of Virginia, but roughly 80% of the industry is located in Loudoun County. To put this in perspective, the aggregate of the next six largest data center markets in the U.S. is not as big as Loudoun County's market. The data center industry in Virginia achieved a peak metered load of almost 2.8 GW in 2022. This load is roughly 1.5 times the capacity of the Company's North Anna nuclear facility.³

Q. Has Dominion submitted data in prior Commission proceedings forecasting the growth of datacenters in Virginia?

¹ See The Impact of Data Centers on Virginia State and Local Economies, Northern Virginia Technology Council (Apr. 2024) <https://www.nvtc.org/topics/data-center-and-cloud/report/>.

² *Id.* At 19-20.

³ *Commonwealth of Virginia, ex rel. State Corporation Commission, In re: Virginia Electric and Power Company's 2023 Integrated Resource Plan filing pursuant to Va. Code § 56-597 et seq.*, Case No. PUR-2023-00066, Integrated Resource Planning Guidelines at 55 (May 1, 2023).

- 1 A. Yes. In its 2023 Integrated Resource Plan, Dominion’s forecast projected a nearly
 2 four-fold growth in data center peak demand and energy usage over the next
 3 years, as seen in the graphs below.

**Figure 4.1.5.3 – DOM LSE Data Center Peak Demand Forecast (MW)
 (Excludes Retail Choice)**

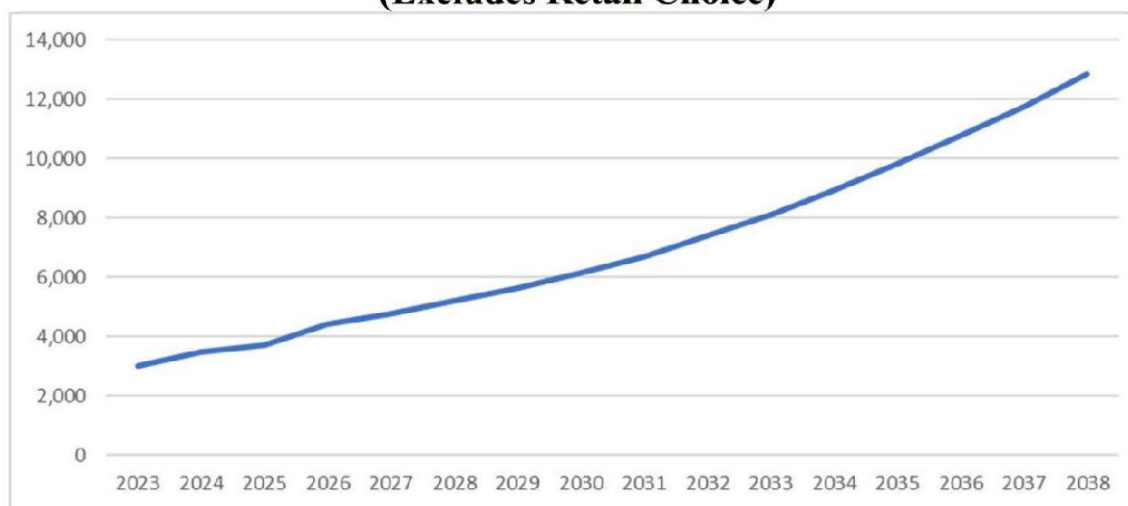
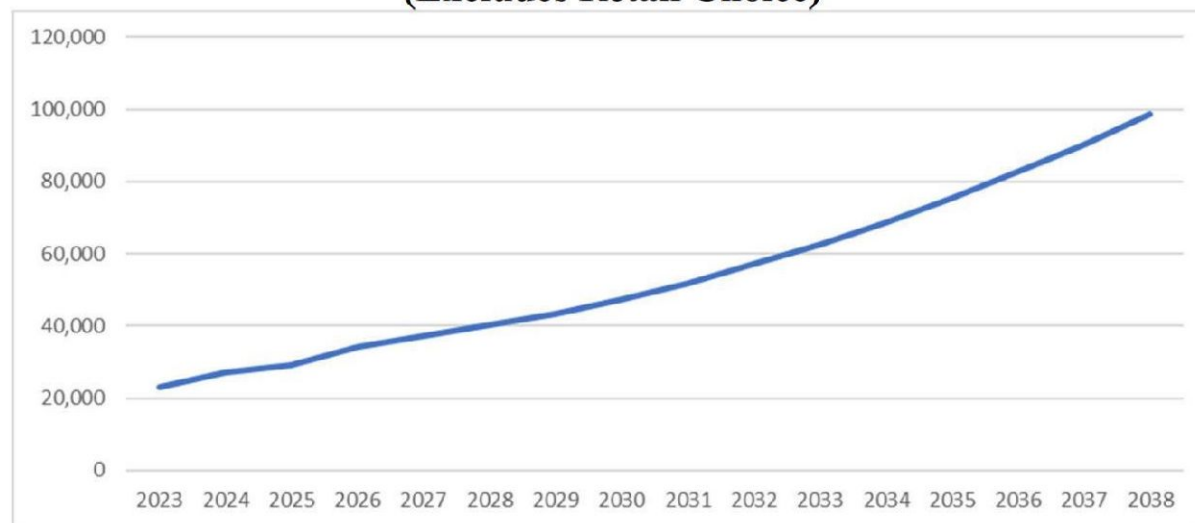


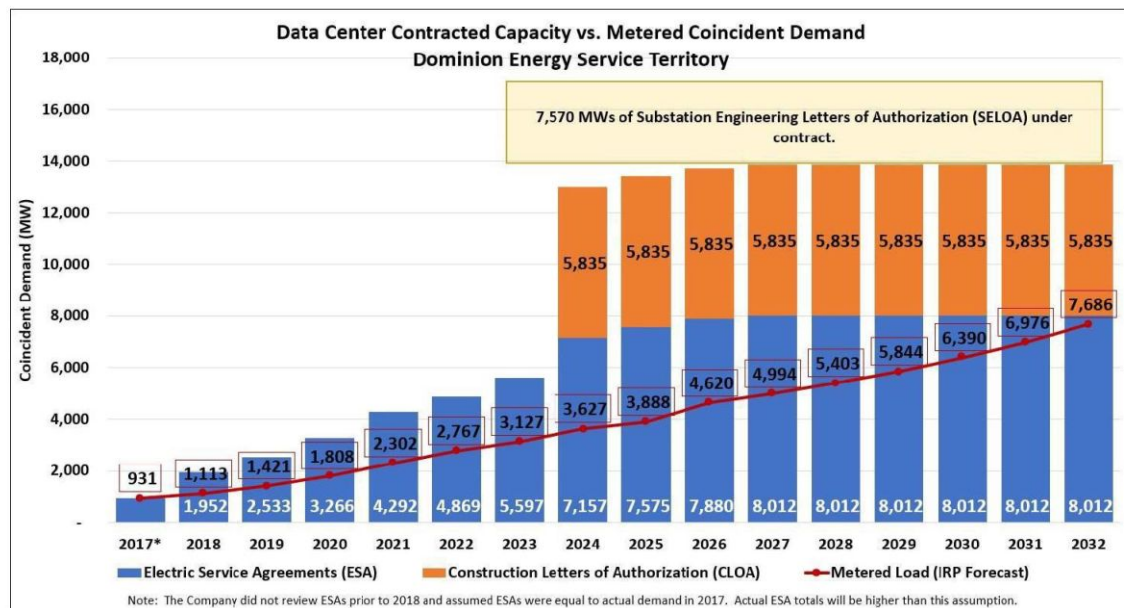
**Figure 4.1.5.4 – DOM LSE Data Center Energy Forecast (GWh)
 (Excludes Retail Choice)**



- 4 And in its 2024 IRP Dominion reported: “Dominion Energy is confident in its Data Center Load
 5 Forecast. The Company uses a combination of historical metered data along with forward-
 6 looking customer intelligence, derived from long-term relationships with customers, to develop

its Data Center Load Forecast. The Company provides a DOM LSE 15-year data center load forecast to PJM, who independently reviews and verifies before incorporating it into PJM's own forecast. Dominion Energy's Data Center Load Forecast is informed and validated by existing contracts with customers. As projects progress, customers enter into a series of contracts with binding financial commitments. Dominion Energy regularly reviews this contractual approach to ensure that its Data Center Load Forecast reflects projects that will come to fruition. Figure 2.1.7 illustrates customer contracts executed as of July 2024. These contracts are broken into (i) Substation Engineering Letters of Authorization ("SELOA"), (ii) Construction Letters of Authorization ("CLOA"), and (iii) Electric Service Agreements ("ESA"). As a customer moves from (i) to (iii), the cost commitment and obligation by the customer increases."

Figure 2.1.7: Customer Contracts Executed, as of July 2024



This case is representative of a question being asked across the country and definitely in Loudoun County; how can energy providers and governmental agencies ensure reliable electricity service is available for the colossal need of the data center industry while at the same time being thoughtful and considerate to those who live

1 in or near data centers? Indeed, Dominion has recognized the difficulty of this balance
2 when it stated in the 2024 IRP that “[t]he concentration of data centers primarily in
3 Loudoun County, Virginia represents a unique challenge and requires significant
4 investments in electric transmission facilities to meet the growing demand.”

5 **Q. Why does LVE I believe that the Transmission Line should be placed underground?**

6 A. Given the substantial electricity demands of data centers that will continue to grow
7 as forecasted by Dominion and PJM, LVE I believes that now is the time to introduce
8 undergrounding as an alternative to overhead transmission lines and towers.

9 A pilot program to collect data regarding underground lines will benefit the public
10 by allowing all stakeholders to learn more about reliability and cost issues, among others.
11 At the same time, LVE I believes that the undergrounding plan put forward by Loudoun
12 County will minimize adverse impacts to the greatest extent reasonably practicable for the
13 entire community.

14 The County’s undergrounding plan would ensure the safe and reliable delivery of
15 power where it is needed while preserving the scenic beauty and property values
16 throughout Loudoun County.

17 **Q. How does Loudoun County’s underground proposal align with local plans and**
18 **community expectations?**

19 A. Loudoun County’s 2019 Comprehensive Plan for this area never contemplated
20 overhead high-voltage transmission infrastructure through established residential
21 neighborhoods. Our community was planned, built, and purchased with the understanding
22 that this corridor would remain residential in character. Homeowners, schools, and local
23 governments all made long-term investments guided by that expectation.

1 Allowing this project to proceed above ground would upend those settled plans and
 2 impose industrial-scale infrastructure in an area never designed or zoned for it. Loudoun
 3 County's underground proposal restores consistency between the County's land-use
 4 framework and Dominion's transmission planning obligations.

5 Adopting Loudoun County's underground proposal would also give the
 6 Commission practical experience with large-scale undergrounding in a residential corridor
 7 - insight that can inform future cases.

8 **Q. How would undergrounding the Transmission Line minimize adverse impacts to the**
 9 **greatest extent reasonably practicable?**

10 A. LVE I acknowledges that constructing the line underground is expected to be more
 11 expensive at the outset. While the initial cost of construction is an appropriate factor for
 12 the Commission to weigh, it is not the only factor to consider. From an economic
 13 perspective, placing high voltage transmissions lines underground increases their
 14 reliability, which in turn reduces the costs of maintaining and restoring lines following
 15 outages, and reduces the amount of economic disruption to the communities served by a
 16 transmission line when there is a service outage. Indeed, a Report dated September 2024
 17 prepared by the Berkeley Lab for the United States Department of Energy (DOE) states:

18 The key advantage of underground transmission and distribution lines is
 19 substantially reduced vulnerability to disruption from extreme weather and
 20 wildfires (by preventing initial ignition as well as propagation), resulting in
 21 both reliability and resilience improvements. Underground infrastructure
 22 prevents outages that would otherwise occur on overhead lines (e.g.,
 23 lightning strikes, icing), and in doing so reduces overall system restoration
 24 times, or interruption durations. Researchers at Stanford found that a 10%
 25 increase in a system's underground line miles was correlated with a 14%
 26 reduction in annual interruption durations across the U.S.⁴
 27

⁴ **Underground Transmission and Transmission Lines**, *Resilience Investment Guide*, Page 3, (September, 2024),
 United States Department of Energy.

1 Indeed, this same report notes that for the period from 2016 to 2022 Dominion itself
2 reported that its own underground transmission lines experienced a 99 percent
3 improvement in the System Average Interruption Frequency Index, which measures the
4 average number of interruptions a customer experiences during the applicable time period.
5 Clearly, a 99 percent improvement in reliability results in less financial disruption to the
6 customers and less maintenance and restoration costs to be incurred by Dominion. We
7 understand that other reports have noted that undergrounding main feeder lines and lateral
8 electrical lines increases the robustness of the distribution grid to most weather events, such
9 as high winds and storms, lightning, snow and ice, and wildfires, and also reduces the risk
10 of damage from falling trees and limbs.⁵

11 Also, the economic benefits of constructing the transmission lines underground
12 include preventing the devaluation of property along the overhead line.
13 Loudoun County has provided an appraisal indicating that if the overhead Transmission
14 Line is approved as proposed by Dominion, it would result in a significant devaluation of
15 property along the route. Loudoun County will present witness testimony regarding the
16 appraisal in more detail.

17 Given that LVE I contains homes possessing a combined appraised value in excess
18 of \$750 million, any significant devaluation of property along the route will have a
19 substantially negative economic impact on LVE I and its residents. If the Commission
20 permits Dominion to construct the proposed line above-ground, implicit in its decision will
21 be the prioritization of reducing Dominion's up-front construction costs over the financial

⁵ **The Changing Economics of Utility Investment in Undergrounding**, Chris Watts, Director-Regulatory Affairs, S&C Electric Company, 2023

1 health of the residents of our community. In essence, Dominion's increased profit margin
2 would be at the expense of LVEI's residents.

3 Also, the Commission must also consider which option will minimize impacts on
4 scenic assets, historic resources, the environment, economic development, and ensure fair
5 treatment of Environmental Justice and fence line communities as defined in the Virginia
6 Environmental Justice Act. Indeed, given that a majority of LVEI residents are racial
7 minorities, the disparate impact of the proposed above-ground routes in a manner that
8 appears to be racially discriminatory in nature appears to reflect that Dominion has not
9 engaged in the appropriate level of Environmental Justice analysis required by prior orders
10 of the Commission.

11 We also cannot provide testimony without expressing our grave concerns about the
12 potential that an above-ground 500 kV transmission line can create dangerous health risks
13 to the residents of our community. Medical studies using magnetic field strength as an
14 exposure measure have found that exposures greater than the range of 0.3 to 0.4 μ T lead to
15 a doubling risk of leukemia, with very little risk below this level.⁶ This exposure range is
16 approximately equal to a distance of 60 meters within a high-voltage power line of 500 kV.

17 Other studies have shown that there is an increased risk of childhood
18 leukemia at distances far greater than 60 meters. Specifically, a study performed in
19 the United Kingdom found that children living in homes as far as 600 meters from
20 power lines had an elevated risk of leukemia. This study found there to be an
21 increased risk of 69% for leukemia for children living within 200 meters of power
22 lines while an increased risk of 23% was found for children living within 200 to

⁶ Ray Copes, MD, FRCPC, Prabjit Barn, MSc., Is living near power lines bad for our health?. BCMJ, Vol. 50, No. 9, November, 2008, Page(s) 494 - BC Centre for Disease Control.

1 600 meters of the lines.⁷ A large percentage of the homes within LVE I are located
2 within these increased leukemia risk zones.

3 Placing powerlines underground will reduce this risk. We urge the Commission to
4 not make a decision based solely on the upfront costs to Dominion that will result in
5 increased risk of childhood leukemia for the children of LVE I.

6 As mentioned above, the proliferation of data centers in Loudoun County will
7 require continued expansion of electric infrastructure. By considering undergrounding, the
8 Commission can be more intentional in considering what placement balances both the
9 growing need for power and the serious impact on the local community from health
10 perspective, environmental perspective, economic impact, and aesthetic value. This
11 project can be transformative and help to balance Virginia's growing energy needs brought
12 on by data centers by doing right by residents and businesses that must co-exist in close
13 proximity with the data centers.

14 Growing public concern over the proliferation of massive 500/230 kV above-
15 ground powerlines and 185-foot towers to supply data centers is one of the major factors
16 causing backlash against growth of the data center industry and power companies such as
17 Dominion. Elected officials in Loudoun County and other areas of Virginia and even
18 outside of the Commonwealth has reacted to and addressed this public concern by
19 promoting zoning and development constraints that protect residential and commercial
20 properties from encroaching industrial development such as data centers. Failure to place
21 meaningful limits on above-ground transmission lines in areas where they do harm, and to
22 address Dominion's reluctance to acknowledge and deal with these impacts, will cause

⁷ Draper G, Vincent T, Kroll ME, et al. Childhood cancer in relation to distance from high voltage power lines in England and Wales: A case-control study. BMJ 2005;330:1290.

1 additional constraints to be placed on the growth of this industry. Without appropriate
2 measures, backlash from impacted property owners will continue to heighten, and hamper
3 further data center development, and thereby economic development.

4 Undergrounding when possible is one of the most effective ways the
5 Commonwealth can continue to welcome and foster the development of the data center
6 industry, while also shielding residents and businesses from the adverse effects of above-
7 ground transmission lines.

8 **Q. Does the proposed project add to existing infrastructure impacts already experienced**
9 **by the community?**

10 A. Yes. Residents in southeastern Loudoun County, including those within LVE I, are
11 already experiencing the cumulative effects of intensive data center and utility
12 development. In recent years, the area has seen multiple substations, feeder lines, and
13 ongoing construction related to serving data center demand. These projects have increased
14 traffic, noise, and industrial presence in what was planned and zoned as a residential
15 community.

16 The proposed Golden-to-Mars transmission line would further compound these
17 impacts. It places additional infrastructure in the same concentrated corridor that is already
18 bearing disproportionate energy-related development pressures. Communities like LVE I
19 are being asked to absorb repeated disruptions and long-term aesthetic, environmental, and
20 property-value impacts while contributing no corresponding benefit. For that reason, the
21 Commission should view this project not in isolation, but in the context of the broader
22 cumulative burden already imposed on this part of Loudoun County.

1 This case presents an opportunity for the Commission to evaluate the use of
2 underground transmission construction for data-center-driven load growth in residential
3 areas. Loudoun County's proposal offers a controlled, data-rich opportunity to assess long-
4 term reliability, maintenance costs, and community benefits associated with
5 undergrounding. The experience gained here will inform future Commission decisions
6 while minimizing risk to ratepayers. We recognize this would be the first 500 kV line in
7 Virginia, but some line needs to be the first and testimony filed by the County shows that
8 underground placement of Golden to Mars is feasible and it was unreasonable for
9 Dominion to fail to offer even one underground option in its application making the
10 County's underground plan an optimal opportunity for such a project to be completed.

11 **Q. Does LVE I believe underground costs should be allocated to high wattage**
12 **users?**

13 A. Yes. The reason for the need for increased electrical capacity in Loudoun County
14 is the proliferation of data centers throughout the county. These data centers are developed
15 by some of the wealthiest occupants of the region for the benefit of some of the largest
16 companies on planet earth, with collective valuations in the
17 tens of trillions of dollars.

18 It is fundamentally unfair to the residents of Loudoun County for the average
19 homeowner to experience substantially increased rates for electricity to fund the
20 construction of a powerline that is needed to provide power to the largest companies in the
21 world. Our residents should not be responsible for maximizing the profit margin for
22 companies such as Dominion, Amazon, Microsoft, Google, Meta Platforms, Apple,
23 OpenAI, Nvidia, and others.

1 As a matter of fundamental fairness, if Dominion seeks recovery through general
2 rate cases, then ordinary homeowners statewide will subsidize facilities built almost
3 entirely for data-center loads - contrary to the principle of cost causation that customers
4 who create extraordinary demand should bear the corresponding costs.

5 **Q. Does LVE I support any overhead routes in the event the Commission**
6 **determines that the Transmission Line cannot be undergrounded?**

7 A. No. LVE I believes that the only appropriate placement of the Transmission Line
8 is underground in the location proposed for the Pilot Program.

9 **Q. Does LVE I feel its right to due process has been violated by Dominion?**

10 A. Yes. Dominion presented several underground routes depicting solutions to the
11 community that were relied upon by its residents only to remove all underground routes
12 just weeks before filing its application with the State Corporation Commission. This
13 sequence of events created the appearance of a 'bait-and-switch,' depriving the County and
14 community of meaningful notice and opportunity to respond.

15 Further, Dominion introduced an additional above-ground route after the filing of
16 its application with the State Corporation Commission. No open houses were held by
17 Dominion for this route and no meaningful opportunity to provide public input was made
18 available to the public prior to the filing of the Application.

19 Also, we note that Dominion's underground feasibility study appears to have been
20 designed to create impediments to their self-selected routes that could be avoided in other
21 alternative locations for underground routes. For instance, selecting routes that run through
22 a flood plain or through extensive diabase rock was a decision made solely by Dominion,
23 and ignored other viable routes that do not include similar impediments to construction.

1 We also believe that Dominion purposely creates a false impression in their report
2 that the Loudoun County School Board might oppose an underground route when, in
3 reality, the Loudoun County School Board supports an underground route.

4 **Q. Does this conclude your testimony?**

5 A. Yes, it does.

6 In closing, LVE I appreciates the Commission's attention to this matter. We are not
7 opposing progress - we simply ask that growth be pursued responsibly. Requiring
8 underground construction for this project would protect existing neighborhoods while
9 allowing the Commonwealth to meet its energy and economic-development needs in a
10 balanced way.

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of October 2025, a true and correct copy of the foregoing was sent by email to:

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