

**Virginia State Corporation Commission
eFiling CASE Document Cover Sheet**

Case Number (if already assigned)	PUR-2025-00056
Case Name (if known)	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
Document Type	NTPA
Document Description Summary	NOTICE OF PARTICIPATION AS RESPONDENT, Theresa Ghiorzi, pro se

Total Number of Pages	5
Submission ID	35077
eFiling Date Stamp	9/5/2025 10:02:37AM

**COMMONWEALTH OF VIRGINIA
BEFORE THE
STATE CORPORATION COMMISSION
RICHMOND, VIRGINIA**

**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

NOTICE OF PARTICIPATION AS RESPONDENT

Theresa Ghiorzi

COMES NOW the Respondent, Theresa Ghiorzi, *pro se*, pursuant to Rule 5 VAC 5-20-80(B) of the *Rules of Practice and Procedure* of the State Corporation Commission (the “**Commission**”), and the Commission's Order for Notice and Hearing dated June 3, 2025 (the “**Order for Notice and Hearing**” or “**ONH**”), and hereby files its Notice of Participation as a Respondent, and in support thereof states as follows:

1. This Application is part of baseline upgrades in the update to the Regional Transmission Expansion Plan approved by the PJM Board of Managers on December 11, 2023. PJM’s reasons for these projects are the loss of 11,000 MW of baseload fossil fuel generation, combined with ~7,500 MW of unprecedented data center load growth currently forecast by 2027 - 2028 in Dominion (Northern Virginia) and APS (Doubs) (*aka Virginia's “data center alley”*) . PJM also notes that the vast majority of new generation is solar, which is not available and not sufficient to support the projected data center load, and that energy will be drawn into the area from the West of Doubs (*the Fort Martin Power Station and the Harrison Power Station coal fired generation plants in West Virginia*) and east of Peach Bottom (*the Peach Bottom Nuclear Generating Station in Pennsylvania*)¹

¹ PJM Reliability Analysis Update, December 5, 2023, Page 2; Available at: <https://www.pjm.com/-/media/committees-groups/committees/teac/2023/20231205/20231205-item-15---reliability-analysis-update-2022-window-3.ashx>

On February 25, 2025, the PJM Board of Managers approved another set of Regional Transmission Expansion Plan projects, 2024 RTEP Window 1² to support the data center expansion in this same area. These are now known as the Valley Link Projects, consisting of two additional 765kV transmission lines. A southern 765kV line originating in Campbell County, Virginia (where a new nuclear generation plant has been proposed) and a northern 765kV transmission line originating at the John Amos coal fired generation plant in West Virginia. The northern line is a re-tread of the PATH transmission line that was defeated and withdrawn in 2012.³

The PJM 2025 RTEP Window 1 planning cycle, which is currently in progress, is again soliciting proposals to solve problems in this same area - Dominion (Northern Virginia) and APS (Doubts) (*aka Virginia's "data center alley"*), due to the mindboggling electrical demands of the data center industry.

Both PJM and electric company representatives have stated that more lines will be needed to support the projected data center load growth.

The Commonwealth of Virginia's 2022 Energy Plan unambiguously states :

"To meet Virginians' round-the-clock energy needs, full compliance with VCEA will necessitate a reliance on other PJM states to produce the baseload generation capacity for the Commonwealth absent incorporation of currently unavailable grid storage, nuclear, or hydrogen technologies. In short, VCEA depends on Virginia outsourcing reliable baseload capacity to other states, many of which have a high percentage of coal and natural gas generation, and increasing Virginia's dependence on electricity imports"⁴

Continuing,

"If Virginia increases its reliance on intermittent generation, the level of electricity imports from other states will increase and expose Virginia to future changes that may occur in net exporting states, such as Illinois, Ohio, Michigan, Pennsylvania and West Virginia"⁵

² "PJM Constructability & Financial Analysis Report 2024 RTEP Window 1", Page 17, Available here: <https://www.pjm.com/-/media/DotCom/committees-groups/committees/teac/2025/20250107/20250107-2024-rtep-window-1-constructability--financial-analysis.pdf>

³ Virginia SCC Case PUE 2009-00043 Application of PATH Allegheny Virginia Transmission Corporation

⁴ "Commonwealth of Virginia 2022 Energy Plan", Virginia Department of Energy, October 2022, Page 10; Available

at https://energy.virginia.gov/energy-efficiency/documents/2022_Virginia_Energy_Plan.pdf

⁵ *Ibid.*, Page 14

Dominion's Virginia Integrated Resource Plan also calls for increasing generation imports from other states in the region to more than 10,000 MW.⁶ The recent 2024 JLARC Data Center Report says " the state would need to more than double the amount of energy imported from out of state. "⁷

The largest concentration of data centers in the world is situated in Loudoun County, Virginia. Additional counties to the south / south west of Loudoun County are anticipating data center growth. The states within the PJM Region which are currently exporters of electricity are to the North, North West and North East of Loudoun County. It is highly likely that many of the additional multi-state transmission lines necessary to service the data center electricity demand will be routed through Western Loudoun County.

Therefore, Theresa Ghiorzi as a resident of Loudoun County and owner of private property within Loudoun County, has an interest in the residential electric rates and reliability of service within the PJM Region as well as the expansion of the grid across Western Loudoun County to service data center load.

2. On March 28, 2025, Virginia Electric and Power Company ("Dominion" or the "Company") initiated Case Number PUR-2025-00056, by filing an Application (the "Golden- Mars Application") with the Commission, pursuant to Code§ 56-46.1, and the Utility Facilities Act, Code§§ 56-265.1 *et seq.*, for approval and certification of electric facilities in the County. The Company in the Golden-Mars Application proposes to (1) construct new approximately 8.3-mile-long 500 kV and 230 kV electric transmission lines to run from the 500 kV and 230 kV buses of the 500-230 kV Golden Substation, and to terminate at the 500-230 kV Mars Substation; (2) remove Mars-Shellhorn Line #2095 and Mars-Sojourner Line #2292 from the existing corridor and reconnect Sojourner and Mars Substations along an alternate route; (3) construct a new approximately 0.6-mile overhead double circuit 230 kV transmission line; (4) construct a new approximately 1.9-mile overhead double circuit 230 kV transmission line from Mars Substation to Sojourner Substation; and (5) perform work at the Golden, Mars, Lockridge, Sojourner, and Shellhorn Substations. Dominion asserts that the proposed Golden- Mars line is necessary to relieve identified

⁶ "Virginia Electric and Power Company - 2023 Integrated Resource Plan", Virginia State Corporation Commission, Case No. PUR-2023-00066, 2023

⁷ "Report to the Governor and the General Assembly of Virginia, Data Centers in Virginia 2024", ("JLARC Data Center Report") , Page 32: Available here: <https://jlarc.virginia.gov/pdfs/reports/Rpt598-2.pdf>

violations of NERC Reliability Standards and to maintain and improve reliable electric service to customers in the Eastern Loudoun Load Area.

3. At this time Theresa Ghiorzi does not take a position on the action or actions that the State Corporation Commission should take on the application, but reserves the right to take a position as the record develops in this proceeding.

4. Theresa Ghiorzi is still reviewing the Application and the other filings in these proceedings, and thus reserves the right to address, in subsequent filings, additional issues raised in these proceedings and to develop facts, examine witnesses, engage in discovery and present argument before the Commission.

5. Service of all documents in this proceeding for Theresa Ghiorzi should be made to the respondent's home address:

39558 Wenner Road
Lovettsville, VA
20180

Phone: 540-822-5584
e-mail; theresag@ccone.com

6. Pursuant to Ordering Paragraph (5) of the Order for Notice and Hearing, all documents, including this Notice of Participation, to be filed in this matter shall be filed electronically to the extent authorized by Rule 5 VAC 5-20-150 of the Commission's *Rules of Practice and Procedure*.

WHEREFORE, Theresa Ghiorzi, respectfully requests that the Commission accept this Notice of Participation as a Respondent; that Theresa Ghiorzi be joined as a party to these proceedings; and that Theresa Ghiorzi, listed above, be placed on the Service List for all proceedings related to the Aspen Application, the Apollo Application, and the Consolidated Applications.

Respectfully Submitted the 5th of September 2025,

Theresa Ghiorzi, *pro se*

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of September 2025, a copy of the foregoing was served to, pursuant to Ordering Paragraph (6) of the Order for Notice and Hearing, to:

David J. DePippo
Annie C. Larson
Charlotte P. McAfee
DOMINION ENERGY SERVICES, INC.
120 Tredegar St, RS-2
Richmond, VA23219
David.j.depippo@dominionenergy.com
Charlotte.p.mcafee@dominionenergy.com
Annie.c.larson@dominionenergy.com

Vishwa B. Link, Esq.
Jennifer D. Valaika, Esq.
Anne Hampton Haynes, Esq.
Briana M. Jackson, Esq.
McGuire Woods LLP 800
E. Canal Street
Richmond, Virginia 23219
vlink@mcguirewoods.com
jvalaika@mcguirewoods.com
anaynes@mcguirewoods.com
bjackson@mcguirewoods.com

Sarah B. Nielsen
McGuireWoods LLP
1301 Gervais Street
Suite 1310
Columbia, South Carolina 29201
snielsen@mcguirewoods.com

Andrew R. McRoberts, Esq.
Adam B. Winston, Esq.
Sands Sanderson PC
919 East Main Street, Suite 2300
Richmond, Virginia 23219
amcroberts@sandsanderson.com
awinston@sandsanderson.com

C.M. Browder, Jr., Esq.
Office of the Attorney General Division of
Consumer Counsel
202 North 9th Street, 8th Floor
Richmond, Virginia 23219
mbrowder@oag.state.va.us

William H. Chambliss, General Counsel
Andrew Major, Attorney II
William H. Harrison, IV, Senior Counsel
Office of General Counsel
State Corporation Commission
P.O. Box 1197
Richmond, Virginia 23218
William.Chambliss@scc.virginia.gov
Andrew.Maior@scc.virginia.gov
William.Harrison@scc.virginia.gov
OHEParalegals@scc.virginia.gov

Todd A. Sinkins
Nasim Saeidi
Whiteford Taylor & Preston L.L.P.
3190 Fairview Park Drive, Suite 800 Falls
Church, Virginia 22042
tsinkins@whitefordlaw.com
nsaeidi@whitefordlaw.com

Leo P. Rogers, Esq.
Jonathan M. Zator, Esq.
Loudoun County Attorney
1 Harrison Street, S.E.
Leesburg, Virginia 20177
leo.rogers@loudoun.gov
jonathan.zator@loudoun.gov

Dated this 5th day of September, 2025,

/S/ Theresa Ghiorzi, *pro se*