



*Protecting and restoring the lands and waters of the Virginia Piedmont,
while building stronger, more sustainable communities*

June 23, 2026

Fauquier County Board of Supervisors
10 Hotel Street, 3rd Floor
Warrenton, VA 20186

Re: Remington Tech Park SITP-25-024646, REZN-25-025515, & STUD-25-025543

Members of the Fauquier County Board of Supervisors:

Revised Power Proposal Before Fauquier County. The revised Remington Tech Park data center power plan replaces 13 natural gas turbines with 488 natural gas solid oxide fuel cells (SOFC). Although this change would reduce criteria pollutants including particulate matter, sulfur dioxide, and nitrogen dioxide, the application still asks Fauquier County to approve a large, behind-the-meter **fossil fuel** power generation plant to serve data center operations. The nearly 200 diesel back-up generators along with their above-ground fuel storage will still be required.

County Zoning and Governance Gap. Fauquier County does not currently have a zoning ordinance framework for reviewing, regulating, or governing a private utility—and more specifically, it does not have standards for a private SOFC power plant. Approval now could create a dangerous precedent and place the burden of unresolved regulatory, safety, and governance questions on the residents of Fauquier County.

Permanent SOFC Power Plant, Not a Temporary Bridge. Rather than serving as a temporary bridge to long term power provision by Dominion Energy, the SOFC plant would be deployed as a **permanent** solution for powering the first two data center buildings. The project would still require a natural gas gate station and a new pipeline extending from a local gas transmission pipeline. There is no decommissioning plan.

Unprecedented Scale & Permanency Warrant Decision Deferral. With this new power design, Fauquier County is being asked to consider a private SOFC plant at a **scale** that is **unprecedented around the world** and not yet supported by a local regulatory framework. PEC asks that the Board defer its decision until the County can:

- Evaluate whether existing fire, electrical, and building codes are adequate for this form of power generation
- Develop emergency management policies and risk mitigation procedures for a private fuel cell power plant of this scale
- Determine how to regulate and govern a private utility that falls outside the County's current zoning ordinance framework

Proffers Must Identify the SOFC Technology and Supporting Infrastructure. The applicant continues to return with revisions intended to allow this project to move forward, yet the latest revision removes from the proffers both a definition of and a commitment to a specific fuel cell technology. The pending technology, its operation,

and its specific utility service to the data center should be explicitly described.

At a minimum, PEC asks that the updated proffers identify:

- The power requirements for the first two data center buildings the SOFC plant is intended to serve;
- The specific SOFC units planned and the quantity of units required for each building;
- The remaining onsite infrastructure required for SOFC operation;
- General specifications for the natural gas gate station; and
- The pipe size and proposed route of the gas distribution line connecting the gate station to the local gas transmission pipeline.

Remaining SOFC Environmental Risks: CO₂ and Heat. This application implies the revised SOFC proposal is free of health, safety, and general welfare risk. It is not. Two significant environmental risks remain due to the scale of this proposed operation and they should be mitigated: **CO₂ emissions** and **heat emissions**. For that reason, PEC asks that two impactful additions to the SOFC technology be expected as part of this project:

Combined Heat and Power (CHP). CHP is an available option for Bloom Energy Server 6.5 and marketed as **Energy Server® SOFC System with Integrated Heat Capture**. CHP is designed for facilities with constant, year round demand for both electricity and useful thermal energy. It simultaneously generates electricity and captures heat that would otherwise be wasted for uses such as hot water, steam, or air conditioning. Because SOFC systems operate at high temperatures and can capture exhaust heat, CHP can improve total system efficiency beyond electricity-only operation.

Carbon Capture Utilization and Storage (CCUS). Bloom Energy has announced a partnership with Chart Industries for Bloom SOFC systems designed to process the CO₂ exhaust stream for utilization or sequestration. If Fauquier County is being asked to consider a permanent fossil fuel power plant for private data center operations, the application should discuss whether CCUS will be incorporated, how captured CO₂ would be handled, and whether utilization or sequestration infrastructure is available and permitted.

Request for a Meaningful Deferral. There is an opportunity here to require the least impactful implementation of a **private power plant** serving a data center in Fauquier County. PEC respectfully asks that the Board defer action on this application long enough for the applicant to update the **proffers** with specific commitments on the SOFC power plant, CHP, CCUS, gas infrastructure, and utility service to the first two data center buildings.

The deferral should also allow Fauquier County the time required to put in place **policies, procedures, zoning standards, and codes necessary to regulate and govern this private SOFC power plant** in a manner that protects the health, safety, and general welfare of County residents. These are **reasonable expectations** for a private fossil fuel power plant proposed as a permanent power solution for a data center.

With highest regards,

Evelyn Eichorn

Sr. Land Use Field Representative, Fauquier County
The Piedmont Environmental Council