Energy Infrastructure and Data Centers
Sponsors For Tonight's Town Hall

Piedmont Environmental Council

Loudoun Wildlife Conservancy

Loudoun County Preservation and Conservation Coalition

Waterford Foundation, Inc.
Julie Bolthouse
Director of Land Use
The Piedmont Environmental Council
PEC’s mission:

Protect and restore the lands and waters of the Virginia Piedmont, while building stronger, more sustainable communities.
Today’s Discussion

- Proposed Transmission Line Route and Impacts
- Explosive growth of the data center industry
- Trends and projections
- What can we individually and collectively do
You can view this map and zoom in/out at: pecva.org/transmissionmap
Transmission lines

Transmission lines are the big, high voltage power lines that bring electricity from where it's made at our generating stations to substations near communities across B.C.

What's a kV?

kV stands for kilovolt, which is a unit of potential energy. One kV is equal to 1,000 volts.
February 1
Initial Cases/Files Posted

May 31
2022 RTEP Window 3 Closed

October 3
TEAC Short-list presentation

Mid-December
PJM Board approval

February 24
2022 RTEP Window 3 Opened

October 31st + December 5th
TEAC First and Second Read
Allows for 35 days between 1st and 2nd reads
Approximately 6 days to Board meeting from 2nd read
Who? 

What? 

- Single 500 kV overhead transmission line 
- Likely 115-165 foot wide right of way 
- Likely 100-200 feet in height 

Where?
Transmission Line Proposals to Serve Data Center Load Growth

[Map showing transmission line proposals]
The local economy in this area is primarily based on agriculture and tourism.
Another Beautiful Bird Walk at Sweet Run State Park

July 24, 2023 | Posted by Sheila Ferguson | Field Trips, Wildlife News

Dominion Energy Project: Wishing Star to Mars

July 1, 2023 | Posted by Sheila Ferguson | Action Alerts/Advocacy

500 kV transmission lines and towers similar to those proposed

Dominion Energy Projects: Twin Creeks to Apollo and Aspen to Golden

July 8, 2023 | Posted by Sheila Ferguson | Action Alerts/Advocacy, Highlights

Photo by Scott Harris
Regional Transmission Operator - PJM
PJM’s rationale:

- PJM has had unprecedented data center load growth (up to ~7,500 MW) currently forecasted by 2027-28 in Dominion (Northern Virginia) and APS (Doubs).
- 11,100 MW of advanced deactivations to the west and south of Conowingo.
  - Approximately 8,000 MW occurring after the 2022-2023 period.
- The peak load in the Interconnection System Area (ISA) is forecasted to increase by 15,000 MW.
- The new block dispatch procedure has been implemented.
- PJM has implemented a new block dispatch procedure.
  - The old dispatch procedure maintained historical intraregional transfers, dispatching most of the generators in the Dominion zone at 100%.
The route through western Loudoun was selected even though...

According to PJM, Proposal 853 has **medium-high constructability risks** due to anticipated lengthy regulatory process, potential public opposition, construction difficulty, environmental constraints and property acquisition, which may have significant impacts on the cost and schedule for the proposed project.
Side note - the SCC did not eliminate 904 they stated, “765 kV solution could be pursued as part of the longer term solutions in the area depending on how load and generation materialize.”
According to PJM, the model analysis identified a bottleneck through the Doubs-Goose Creek corridor and the need for a solution from the West into the Dominion Data Center vicinity, as such the NextEra proposal ID 853 option yielded higher Capacity Emergency Transfer Limit (CETL) through a 3rd 500 kV supply line to the load center.
There’s **something big** going on.

We don’t have all the answers, but we know what’s happening is important and we know it matters immensely to the **future of Virginia**.

We need to be creative and work together.
Dominion Energy Virginia
Northern Virginia boasts the largest data center market in the world

Data center development in Virginia
- Connectivity to world class fiber networks
- Attractive business climate
- Access to largest data center workforce (U.S.)
- Access to nearby international airport
- Access to affordable and sustainable energy

Committed to deliver safe, reliable, affordable and sustainable energy to our customers

1 https://www.vedp.org/industry/data-centers
2 February 2022 Loudoun County Data Center Land Study
3 Data Center locations provided by Data Center Hawk
Data Center Inventory (MW)

Source: CBRE Research, Q1 2022 & Q1 2023. Figures and data for North American markets include only wholesale colocation facilities. In Europe, Latin America, and Asia-Pacific, total inventory includes both wholesale and retail colocation facilities.
The digital age relies on **data centers**
The digital age relies on a **reliable power grid**

- **Substations**
- **Transmission Lines**
- **Distribution Lines**

250 homes = 1 megawatt (MW)

*1000 MW = 1 gigawatt*
Data centers consume a huge amount of electricity.
Their backup power is **diesel generators**
They create a host of community-level impacts

- Noise
- Water
- Air Quality
- Wildlife Habitat
- Design
- Transmission
And the proposals are getting much bigger

- Older data centers used 10-15 MW per building, and multi-building campuses were rare.

- Now we are seeing 30-90 MW data centers with multi-building campuses.

- A large campus could use 600-1000 MW or more.
Prince William Digital Gateway

3 gigawatts (GW) of energy, equivalent to the power used by 750,000 homes

37 buildings and 15 substations

No allocated right of way for transmission lines connecting the new substations.

Planning Commission Recommended DENIAL

Board of Supervisors vote December 12!
## Approved But Unbuilt + Applications Filed (Virginia)

<table>
<thead>
<tr>
<th>County</th>
<th>Status</th>
<th>Development square feet</th>
<th>Estimated Power Range</th>
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<tbody>
<tr>
<td>Loudoun</td>
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<td>12,286,529</td>
<td>1,843MW – 5,529MW</td>
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<td>Applications</td>
<td>10,938,449</td>
<td>1,641MW – 4,922MW</td>
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<td>Prince William</td>
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<td>Culpeper</td>
<td>Approved</td>
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<td>Applications</td>
<td>1,990,000</td>
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<td>Applications</td>
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<td>Spotsylvania/Caroline</td>
<td>Applications</td>
<td>6,600,000</td>
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<td>King George</td>
<td>Applications</td>
<td>7,500,000</td>
<td>1,125MW – 3,375MW</td>
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</table>
Approved But Unbuilt + Applications Filed (Virginia)

Data Centers:
**Total Approved But Unbuilt**
- 30+ million sq ft
- 4,000 MW – 14,000 MW

These are HUGE numbers.
If 1 MW can power 250 homes…
48,000 MW would power 12 million homes!

Data Centers:
**Total Including Applications**
- 106+ million sq ft
- 16,000 MW – 48,000 MW
The hidden costs of AI: Impending energy and resource strain

Deep Jariwala and Benjamin C. Lee on the energy and resource problems AI computing could bring.

In recent years, artificial intelligence (AI) models like ChatGPT have seen notable improvements, with some people concerned about the societal impacts these new technologies may bring, including looming concerns related to increasing energy and raw materials demands. (Image: Stock/Mikeev Tolkachov)
Modeling Decarbonization: Report Summary and Policy Brief for Virginia Governor’s Office Administration and Policymakers (Chapter 1194, 2020)

TO THE GENERAL ASSEMBLY OF VIRGINIA

SENATE DOCUMENT NO. 17

COMMONWEALTH OF VIRGINIA
RICHMOND
2021

Figure 2: Annual Virginia Electricity Sales by End Use

Source: Energy Information Administration Dominion Energy
Figure 6: Electricity Sales - Baseline and High Demand Scenarios
What’s happening in Virginia is unprecedented.
PJMs Mid Atlantic Territory

- 0.3% annual growth

Green = 2022 projection
Blue = 2023 projection
PJM Western Territory

Summer Peak

- 0.1% annual growth

Green = 2022 projection
Blue = 2023 projection
Dominion Territory Explosive Growth Trends

5% annual growth

Green = 2022 projection
Blue = 2023 projection
That’s a **doubling** of Virginia’s peak load within 14 years!
What’s Dominion’s Plan?

Dominion projects new gas plants, advanced nuclear will be needed to meet soaring demand
Latest long-range plan shows data centers and electrification are driving rising power needs

BY: CHARLIE PAULLIN  •  MAY 3, 2023  •  12:02 AM
Dominion’s plans rely on…
## Executive Summary Table: 2023 Plan Results

<table>
<thead>
<tr>
<th></th>
<th>Plan A</th>
<th>Plan B</th>
<th>Plan C</th>
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<tr>
<td><strong>NPV Total ($B)</strong></td>
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<td><strong>Approximate CO₂ Emissions from Company in 2048</strong> (<strong>Metric Tons</strong>)</td>
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<td>Solar (MW)</td>
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<td>9,300</td>
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<td>Retirements (MW)</td>
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<td>11,399</td>
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<td>25 yr.</td>
</tr>
</tbody>
</table>
This cost will be passed on to ratepayers
“For Alternative Plan B… the Company projects the monthly bill of a Virginia residential customer using 1,000 kilowatt hours ("kWh") per month to be $243.20 by 2035, an increase of $127.02 over the May 1, 2020 level…”

- Dominion legal notice Oct. 25, 2023
“For Alternative Plan B… the Company projects the monthly bill of a Virginia residential customer using 1,000 kilowatt hours (“kWh”) per month to be $243.20 by 2035, an increase of $127.02 over the May 1, 2020 level…”

- Dominion legal notice Oct. 25, 2023

That’s a 100% increase by 2035!
COMMENTARY

Are Virginia ratepayers and residents subsidizing the data center industry?

GUEST COLUMN

FEBRUARY 2, 2023  12:05 AM
Virginia cannot continue down this path.
So what are we doing?
Spreading the word and pushing for state oversight of data center industry
Advocating for state legislative changes…

MITIGATING DATA CENTER DEVELOPMENT’S IMPACTS
LAND USE REFORM

EXECUTIVE SUMMARY
Virginia is home to the largest concentration of data centers in the world, widely cited as hosting 70% of global internet traffic. This massive industry is expanding at a rapid pace, requiring huge amounts of energy, land, and water to operate, resulting in widespread community impacts. Yet, the Commonwealth does not currently have any regulatory oversight of data center development and localities continue to approve more facilities without considering the cumulative impacts. This exponential growth of data centers threatens to dwarf state efforts to meet climate goals, improve air and water quality, advance land conservation, and protect national and state parks.

CHALLENGE
Data center development in Virginia has been accelerating for years with the rise of virtualization and cloud computing. Recently, that demand has exploded throughout the state, with buildings larger than 350,000 square feet, and as tall as 500 feet for some buildings. Developments are now being proposed in environmentally sensitive areas near our national parks, local parks, and in close proximity to our rivers and streams, and in rural areas requiring costly new electrical infrastructure. Others are adjacent to residential neighborhoods, schools, medical facilities, and nursing homes.

THE GIANT FOOTPRINT OF THE DATA CENTER INDUSTRY THREATENS REGIONAL POWER, LAND CONSERVATION, AND AIR & WATER QUALITY

The footprint of this industry is gigantic and threatens regional power supply, water quality, land conservation, and air quality beyond individual localities reviewing the application. A single data center building now uses between 60-90GW of power at peak demand, which is more than 15,000 households. Data centers make up 2% of Dominion Energy, Virginia’s power load (see SURGING ENERGY DEMAND FROM DATA CENTERS, pg 105). A data center can consume 6-8 million gallons of water a day for cooling—the equivalent of a small city's annual consumption. They consume massive amounts of land and as well, Digital Gateway, a proposal in Prince William County, would allow 27 million square feet of data center development, which is the equivalent of about 100 Walmart Supercenters. All of this immense surface water results in increased stormwater runoff and pollution.

To ensure an orderly, justifiable, and fair service, data center facilities have commercially-sized backup power generators and large fuel tanks on site in the case of a grid outage. According to DLG data centers in Loudoun County have air permits for more than 4,000 backup diesel generators with a total rated capacity of over 11 gigawatts of power. For context, the North Anna nuclear power facility has a rated capacity of 1.8 gigawatts. If the rapid pace of data center construction continues, further straining power, these backup generators could increasingly be put to use, putting air quality and public health at risk.

SOLUTION
Despite Virginia having the highest number of data centers in the world, the state lacks critical information about their impacts on our environment and energy grid. Currently, approvals are made unilaterally by localities, which have a strong incentive to approve proposals without considering the broader statewide impacts. A comprehensive study of the impacts on the Commonwealth’s electrical grid, environment, historic and recreational resources, environmental justice concerns, and ability to meet climate goals is critically needed to protect our communities. Specifically, those residents most vulnerable to utility rate hikes, air pollution, and climate impacts.

Julie Bathhouse / Piedmont
Kylie Hart / National F

One of six Amazon data center buildings that sit in front of community in Loudoun County. The buildings hold a total

Photo by Leigh Keny, Piedmont Environmental Council
Advocating for state legislative changes...

PANEL RECOMMENDATIONS

Study the impacts of data center development on the Commonwealth’s electrical grid, environment, historic and recreational resources, and ability to meet climate goals through The National Academies of Science.

Require a grid impact statement be submitted to and approved by the State Corporation Commission for all new data center power demand requests.

Create a framework for a regional review board that evaluates large data center projects.
Advocating for state legislative changes...

SURGING ENERGY DEMAND FROM DATA CENTERS
DIRTY ENERGY INFRASTRUCTURE

EXECUTIVE SUMMARY
Data centers are large industrial buildings filled with computers that store, process, and distribute vast amounts of digital information. Northern Virginia leads the world in data center development, housing nearly 60% of all US facilities. While data centers generate significant tax revenue for the locality in which they reside, they are also the primary driver behind a massive spike in peak electricity demand in Virginia, which, through some estimates, is projected to more than double by 2030. Virginia needs to chart a responsible path forward, balancing the growth of our digital world with the need to power that growth with affordable carbon-free energy.

CHALLENGE
Data storage needs have grown exponentially with the rise of the Internet and new trends like artificial intelligence (AI), cryptocurrency, and the expansion of rural broadband. This has dramatically accelerated this pace for a variety of reasons, including industry tax breaks, low rates, and an existing fiber network in Northern Virginia.

DATA CENTER DEVELOPMENT IS PROJECTED TO MORE THAN DOUBLE THE STATE’S PEAK ELECTRICITY DEMAND THROUGH 2030
In their latest long-term integrated Resource Plan (IRP) filed in April, Dominion Energy has suggested meeting demand growth by building a substantial amount of renewable energy and storage. But this plan also proposes preserving existing coal and natural gas generation as well as building new fossil fuel generation and costly small modular reactors (SMRs). This plan ignores Virginia’s clean energy requirements and places a significant burden on families and other businesses to subsidize the construction and operation of inefficient energy sources necessary to meet the increase in electricity demand.

In addition to a massive increase in needed electric generation, data center growth will also require significant new transmission infrastructure. Just past this General Assembly session, legislation was passed recognizing a $627 million emergency transmission project in response to the Northern Virginia data center strain. On the grid has also brought an increased use of diesel generators which serve as the backup power source for data centers, raising concerns about local air quality.

Current and data centers are approved at the county-level only. The local process does not address cumulative state and regional scale impacts on Virginia’s energy grid, natural resources, and land use. The IRP DATA CENTER DEVELOPMENT (pg 57). Without significant state oversight and planning, Virginia could face uneconomical fossil fuel generation, potentially loading our utilities to pursue unnecessary generation projects, including fossil fuel generation in direct opposition to clean energy policies.

SOLUTION
The loss of data center expansion as a new and global trend of which Virginia is at the forefront. If Virginia is to continue recruiting this industry, numerous questions must be answered to determine a sustainable path forward.

While data centers are an important part of Virginia’s economic development plan, that plan must align with our ability to protect the environment and provide for a clean, affordable energy transition for all. Virginia is facing an unprecedented energy challenge with explosive growth in this sector. Proper planning can increase our ability to offset some of the anticipated impacts, and we can take steps now to provide appropriate energy cost allocation, ensuring responsible parties are paying for the necessary upgrades to our electric system. But in order to develop a holistic and sustainable solution, we need to establish a proper accounting of the economics of the industry.

A comprehensive study is necessary to illustrate the startup-taxes and changes related to different scenarios for buildout of the data industry in Virginia. This study should address energy demand and gauge our ability to meet our goal of a clean energy transition while avoiding unnecessary impacts on communities and natural resources.

POLICY RECOMMENDATIONS
An Independent Study: Conduct an independent body like the National Academy of Sciences to study all costs and benefits of the data center industry. Specifically related to energy demand, it should evaluate impacts to the grid and our ability to reliably meet demand with carbon-free energy. This study should also integrate and replace the necessary energy infrastructure to prevent the project.

Permitting, Planning, and Education: Implement a state review process for new proposals. A review of individual projects that fails to account for the aggregate impacts of all projects inevitably means that no one fully appreciates the total picture. The Department of Energy, in coordination with the Department of Environmental Quality, should provide assistance to local governments, including generating clear information related to the necessary energy infrastructure to prevent the project.

Protect from Cost Shift: The rules governing approval and allocation of costs for new transmission and generation approval should be examined and, if necessary, changed to ensure that parties causing investments bear the costs of those investments preventing residential energy customers from shouldering this burden.
Advocating for state legislative changes...

SURGING ENERGY DEMAND FROM DATA CENTERS
DIRTY ENERGY INFRASTRUCTURE

EXECUTIVE SUMMARY
Data centers are growing at an explosive rate, and with that comes a surge in energy demand. This growth is expected to continue to serve as a favorable location for new data centers. As a result, the backup power source for data centers remains a concern about local air quality.

POLICY RECOMMENDATIONS

An Independent Study
Contract with an independent body like the National Academy of Sciences to study all costs and benefits of the data center industry. Specifically related to energy demand, it should evaluate impacts to the grid and our ability to reliably meet demand with carbon-free energy resources. It should integrate efforts of the industry to improve efficiency and procure clean energy so as to avoid duplication of efforts by our utilities and highlight impacts to ratepayers.

Permitting, Planning, and Education
Implement a state review process for new proposals. A review of individual projects that fails to account for the aggregate impacts of all projects invariably means that no one fully appreciates the total picture. The Department of Energy, in coordination with the Department of Environmental Quality, should provide assistance to local governments, including siting criteria information related to the necessary energy infrastructure to power the project.

Protect from Cost Shift
The rules governing approval and allocation of costs for new transmission and generation approval should be examined and — if necessary — changed to ensure that parties causing investments bear the costs of those investments, preventing residential energy customers from shouldering this burden.

While data centers are an important part of Virginia’s economic development plan, that plan must align with our ability to protect the environment and provide for a clean, affordable energy transition for all. Virginia is facing an unprecedented energy challenge with explosive growth in this sector. Proper planning can offset some of the anticipated impacts, and we can take steps now to provide appropriate cost allocation, ensuring responsible parties are paying for the necessary upgrades to our electric system. But in order to develop a holistic and sustainable solution, we need to establish a proper accounting of the externalities of the industry.

A comprehensive study is necessary to illustrate the opportunities and challenges related to different scenarios for buildout of the data industry in Virginia. This study should address energy demand and gauge our ability to meet our goal of a clean energy transition while avoiding unnecessary impacts on communities and local resources.

POLICY RECOMMENDATIONS

Contract with an independent body like the National Academy of Sciences to study all costs and benefits of the data center industry. Specifically related to energy demand, it should evaluate impacts to the grid and our ability to reliably meet demand with carbon-free energy resources. It should integrate efforts of the industry to improve efficiency and procure clean energy so as to avoid duplication of efforts by our utilities and highlight impacts to ratepayers.

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Protect from Cost Shift
The rules governing approval and allocation of costs for new transmission and generation approval should be examined and — if necessary — changed to ensure that parties causing investments bear the costs of those investments, preventing residential energy customers from shouldering this burden.
Loudoun Has An Important Role…

- Data center applications
- Zoning Ordinance Rewrite
  - Public hearing December 13
- 2024/2025 changes to Comp Plan and Zoning Ordinance
Who is in charge?

- Local governments?
- FERC?
- Virginia State Corporation Commission?
- Dominion?
- General Assembly?
- Governor?
- PJM?
What can you do?

- Send comments to PJM ASAP
- Comment at the BOS Dec 13th Zoning Ordinance public hearing
- Stay informed - NextEra routing process, County Zoning and Planning, etc.
- Reach out to elected officials and support data center reform legislation
- Share information with friends, family, contacts and neighbors
- Financially support the local efforts and the broader campaign that is needed
Questions?
Final Thoughts

“Never doubt that a small group of thoughtful, committed citizens can change the world. Indeed, it is the only thing that ever has”

~ Margaret Mead

Homework!

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- Comment at the BOS Dec 13th Zoning Ordinance public hearing
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- Reach out to elected officials and support data center reform legislation
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