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COMMONWEALTH OF VIRGINIA

BEFORE THE STATE CORPORATION COMMISSION

RICHMOND, VIRGINIA

APPLICATION OF:	)	
NEXTERA ENERGY TRANSMISSION	)	
VIRGINIA, INC	)	
	)	Case No. PUR-2026-00018
For approval and certificate of electric Transmission	)	
facilities under Va. Code Sec. 56-46.1 and the Utilities	)	
Facilities Act, Va. Code Sec. 65-265.1 et seq.	)	

DIRECT TESTIMONY OF

GREGORY ABBOTT

On Behalf of Respondents Theresa Ghiorzi, Allen Hahn, Jr.,

and Allen Hahn, III.

Summary of the Direct Testimony of Gregory Abbott

My testimony examines the application of NextEra Energy Transmission Virginia. Inc. ("NEET VA") seeking approval of, and a CPCN for, electric transmission facilities in Frederick County, Virginia. More specifically, my testimony examines the need for these transmission facilities and concludes that they are solely needed to bring large amounts of power into the Dominion Transmission Zone ("DOM Zone") to serve the explosive projected load growth for a single industry – large-load data centers primarily located in Northern Virginia. This concentration of data centers is commonly referred to as "data center alley".

The rapid escalation in the number and size of data center campuses reflects the evolution of the data center industry as it moves beyond cloud computing into new artificial intelligence ("AI") data center campuses. Indeed, PJM's data center load forecast shows explosive growth for many years into the future primarily concentrated in Northern Virginia. This represents the greatest new demand for electricity since the invention and wide-spread adoption of air conditioning. The main difference being that electricity demand for air conditioning increased load for all customers and across all customer classes whereas the increased electricity demand to serve data centers is comprised of just a handful of some of the largest and wealthiest corporations in the world.

The MARL Project is needed to serve the projected load growth of a single industry - namely, the large-load data center industry in the "data center concentrated load pocket" in data center alley in Northern Virginia. The data center load growth has a high degree of uncertainty that imposes development risks to non-data center customers.

The data center load growth contained in PJM's 2022 load forecast has a high degree of uncertainty that imposes development risks to non-data center customers. Further, the 2.7 GW PW Digital Gateway project was recently cancelled. As such, an updated load flow analysis that reflects PJM's most recent load forecast adjusted to remove the PW Digital Gateway project and to reflect recently approved generation units coming on-line such as the 944 MW Chesterfield Energy Reliability Center may be required for the Commission to "verify" that the MARL project is needed.

PUR-2026-00018
Direct Testimony of Gregory Abbot
On Behalf of Respondents Ghiorzi, et. al.

Q1. PLEASE STATE YOUR NAME AND ADDRESS AND YOUR ROLE WITH THE ASSOCIATION RESPONDENTS.

A1. My name is Gregory Abbott, and my address is 8610 Sunview Lane, North Chesterfield, VA. My expert testimony in this proceeding is on behalf of Theresa Ghiorzi, Allen Hahn, Jr and Allan Hahn, III , represented by Chap Petersen and Associates, PLC.

Q2. PLEASE SUMMARIZE YOUR EXPERIENCE IN ELECTRIC UTILITY REGULATION IN VIRGINIA.

A2. I was previously employed as a member of the Virginia State Corporation Commission ("Commission") Staff and retired in 2022 as a Deputy Director after 24 years of service in the Commission's Division of Public Utility Regulation. Post retirement, I began working as an independent consultant and expert witness. I have widespread experience in the regulation of electric, gas, water, and sewer utilities located in the Commonwealth. This experience ranges from general rate increase applications, class cost of service, rate design, Integrated Resource Plans ("IRPs"), generation certificates of public convenience and necessity ("CPCNs"), Renewable Portfolio Standard ("RPS") cases, coal ash disposal, rate adjustment clauses ("RACs"), Demand-Side Management, PJM matters, weather normalization adjustments, Natural Gas Conservation and Ratemaking Efficiency Act ("CARE") plans, and pole attachments.

I have testified before the Commission in scores of cases and a representative list of cases is provided in Attachment GLA-1.

Q3. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?

A3. My testimony examines the application of NextEra Energy Transmission Virginia. Inc. ("NEET VA") seeking approval of, and a CPCN for, electric transmission facilities in

Frederick County, Virginia. More specifically, my testimony examines the need for these transmission facilities and concludes that they are solely needed to bring large amounts of power into the Dominion Transmission Zone ("DOM Zone") to serve the explosive projected load growth for a single industry – large-load data centers primarily located in Northern Virginia. This concentration of data centers is commonly referred to as "data center alley."

Q4. PLEASE PROVIDE A HIGH-LEVEL OVERVIEW OF THE PROPOSED TRANSMISSION FACILITIES.

A4. NEET VA proposes to construct, own, operate, and maintain the Virginia portions of a new 107.5-mile, 500 kilovolt ("kV") transmission line that will also cross through Maryland, Pennsylvania, and West Virginia, collectively known as the MidAtlantic Resiliency Link Project ("MARL Project"). NEET VA is specifically seeking approval to construct its portion of the MARL Project consisting of the new 500/138 kV Woodside Substation, a new 500 kV transmission line approximately 2.4 miles in length, and related facilities in Frederick County, Virginia.

Q5. WHAT IS THE STATED NEED FOR THIS PROJECT?

A5. NEET VA states that the PJM Board of Managers ("PJM Board") approved the MARL Project in December 2023 through PJM's Regional Transmission Expansion Plan ("RTEP") 2022 Window 3 competitive solicitation process that sought, from qualified transmission developers, more efficient or cost-effective solutions to prevent extensive,

severe, and widespread reliability criteria violations forecasted to occur on the BES that serves the PJM region, including in Virginia.[1]

NEET VA further states that these reliability needs are driven by significant changes on the PJM system, including those caused by the proposed deactivation of numerous generation facilities, as well as data center loads projected within Virginia (DOM zone) and Maryland near the Doubs substation (APS zone).[2] Most importantly, NEET VA states that PJM's thorough and extensive RTEP analysis informed by its modeling, testing, load forecasting, as well as the application of transmission reliability planning criteria—concludes that if the MARL Project is not constructed, the bulk 500 kV transmission system currently serving Virginia and the surrounding PJM Region is at risk of becoming severely overloaded.[3]

Q6. DO YOU TAKE ISSUE WITH PJM'S RTEP PROCESS THAT ESTABLISHED THE NEED FOR THE MARL PROJECT?

A6. No. Given the projected data center load growth in Northern Virginia that was included in PJM's load forecast, I do not take issue with PJM's RTEP analysis *per se* that indicated that additional transmission capacity is required to deliver higher power flows into the DOM Zone to serve this data center load. However, data center load is still a relatively recent development in PJM and forecasting data center load growth is fraught with speculation and uncertainty.

[1] Application at 4.
[2] *Id.* at 6.
[3] *Id.*

In addition, to its load forecast, PJM also considers announced generation unit deactivations[4], announced new generation units expected to come online, and demand response resources in its RTEP analysis. In my opinion, the primary driver for this project is the PJM load forecast revealing a dire need to deliver power to serve projected data center load in Northern Virginia. The announced generation unit deactivations certainly have an impact on the system analysis performed and played a role in shaping the ultimate solution selected by PJM. But the actual pressing need for this project is to deliver more power into the DOM and APS Zones to serve unprecedented forecasted data center load, primarily located in Northern Virginia.

Q7. DID PJM'S RTEP PROCESS CONFIRM THAT DATA CENTER LOAD GROWTH IN NORTHERN VIRGINIA DRIVES THE NEED FOR THE MARL PROJECT?

A7. Yes. Exhibit SA-7 of NEET VA witness Abdulsalam's direct testimony provides PJM's 2022 RTEP Window 3 Transmission Planning Update dated October 3, 2023. Page 6 of this Update states the purpose as: "Address reliability needs in the Dominion and APS zones associated with Data Center Load Forecasts (up to 7,500 MWs by 2027-2028)." Further, on page 11 of this Update, the first need identified is "PJM has had an unprecedented data center load growth (up to ~7,500 MW) currently forecasted by 2027-28 in Dominion (Northern Virginia) and APS (Doubs)."

Exhibit SA-6 of NEET VA witness Abdulsalam's direct testimony provides PJM's Reliability Analysis Report 2022 RTEP Window 3 dated December 8, 2022. Page 4 of this

[4] Most notably the deactivation of the Brandon Shores generation units (1,370 MW) in Maryland.

Report states: "The data center load growth rate (currently concentrating in areas of northern Virginia) continues to increase. FirstEnergy's APS zone (just north of Virginia) is also experiencing data center load development, driving high flows within the northern Virginia transmission system, into the "data center concentrated load pocket." Table 1 on page 5 of this Report shows the 2027 and 2027/28 study cases summer zonal load for Dominion and First Energy. Table 1 is reproduced below.

Table 1. 2027/28 Case Summer Zonal Load for Dominion and FirstEnergy

	Summer Zonal Load (MW)	
Study Case	Dominion/NOVEC	FirstEnergy (APS)
2022 Peak	20,424 (forecast)/21,156 (actual)	8,675 (forecast)/8,412 (actual)
2027 RTEP	23,681	8,780
2027 Baseline	26,393	9,607
2027 High Load Growth	28,893	10,559
2028 RTEP (2023 Load Forecast)	28,705	9,568
Data Center Component Load (modeled in cases)	~5,700	~1,500

PJM modeled 5,700 MW of data center load in the DOM Zone for Dominion Energy Virginia ("DEV") and NOVEC concentrated in Northern Virginia and 1,500 MW of data center load for First Energy for the 2027/28 Case. The MARL Project is specifically needed to serve this "data center concentrated load pocket."

Q8. DO YOU HAVE ANY COMMENTS ON THE PJM LOAD FORECAST USED IN PJM'S 2022 RTEP PROCESS?

A8. Yes. The RTEP process performed by PJM that forms the basis for the need of the MARL Project was done in 2022. The PJM analysis is a snapshot in time reflecting forecasted load as it stood at that time. We can glean additional insights by taking a closer look at the 2022

PJM load forecast.[5] I have examined the 2022 PJM load forecast and it reveals that projected load for the entire PJM RTO would be relatively flat except for the projected load growth in the DOM Zone that is primarily due to projected data center load growth in Northern Virginia. This is the "data center concentrated load pocket" that PJM highlighted in its Reliability Analysis Report 2022 RTEP Window 3. The Table below is based on data from the 2022 PJM Load Forecast.

2022 PJM LOAD FORECAST
SUMMER PEAK LOAD (MW)

	DOM ZONE	PJM-RTO Including DOM ZONE	PJM-RTO Excluding DOM ZONE
2022	20,424	148,938	128,514
2023	21,013	149,351	128,338
2024	21,751	150,309	128,558
2025	22,586	151,165	128,579
2026	23,375	152,259	128,884
2027	23,681	152,322	128,641
2028	23,990	152,689	128,699
2029	24,358	153,334	128,976
2030	24,708	153,775	129,067
2031	25,085	154,275	129,190
2032	25,434	154,381	128,947
2033	25,807	154,767	128,960
2034	26,136	154,977	128,841
2035	26,568	156,135	129,567
2036	26,994	156,700	129,706
2037	27,354	157,689	130,335
Total Increase 2022-2037	6,930	8,751	1,821
Percent Increase 2022 thru 2037	33.93%	5.88%	1.42%

[5] The 2022 PJM load forecast can be accessed through this hyperlink: PJM LOAD FORECAST REPORT

Over the 15-year forecast period from 2022-2037, PJM forecasted summer peak load for the entire PJM RTO to increase by 8,751 MW. However, 6,930 MW or 79% of the 8,751 MW is forecasted to occur in the DOM Zone. Removing the forecasted summer peak load for the DOM Zone reveals that the overall PJM RTO summer peak load is forecasted to be flat growing just 1,821 MW, or 1.43%, over the entire 15-year forecast period.

Although not specifically identified in the PJM forecast, this load growth is not occurring throughout the broader DOM Zone footprint but is rather occurring in the "data center concentrated load pocket" also known as data center alley in Northern Virginia. This is the load forecast used in PJM's RTEP analysis that clearly shows that the MARL Project is required to serve unprecedented forecasted data center load growth in Northern Virginia.

Q9. ARE YOU AWARE OF ANY OTHER EVIDENCE THAT THE FORECASTED LOAD GROWTH IN THE DOM ZONE IS ALMOST ENTIRELY CAUSED BY PROJECTED DATA CENTER LOAD?

A9. Yes. On October 11, 2024, the Commission issued an Order that docketed DEV's 2024 IRP Case and directed DEV to conduct certain modeling sensitivities that remove the projected data center load growth for DEV's least cost plan and for at least one of its VCEA[6]-compliant plans. Specifically, the Commission Order directed the following:

> The Commission finds that Dominion should be required to conduct additional modeling that presents, as a sensitivity for comparison purposes to the Company's modeling presented in its 2024 IRP, the following: (i) its least cost plan, and (ii) at least one VCEA-

[6] Virginia Clean Economy Act.

compliant plan, both with projected data center load growth removed.

DEV's supplemental 2024 IRP filing removed the data center load from DEV's load forecast. The table from the supplemental filing reproduced below shows the impact of removing projected data center load on DEV's coincident peak demand forecast.

SCC Directed 2024 IRP Supplement Figure 2.1.2: Comparison of Coincident Peak Demand Forecast

	CP (MW)	
	2024 IRP	No Data Center Growth
2024	17,353	17,353
2025	17,497	17,309
2026	18,147	17,300
2027	18,465	17,280
2028	18,870	17,290
2029	19,318	17,326
2030	19,787	17,376
2031	20,280	17,453
2032	20,875	17,548
2033	21,504	17,660
2034	22,245	17,818
2035	23,074	18,016
2036	23,985	18,269
2037	24,849	18,402
2038	25,708	18,480
2039	26,623	18,608

Removing projected data center load from the coincident peak load forecast reveals that coincident peak demand for DEV's non-data center customers is expected to have negative annual growth for the first five years through 2029. In 2030, these customers are

projected to resume a positive rate of growth, albeit at a relatively low growth rate. Overall, Dominion projected the coincident peak load for non-data center customers to add just 1,255 MW, from 17,353 MW to 18,608 MW over the 15-year forecast period. The coincident peak load including data center load growth is projected to add 9,270 MW over the 15-year period. Thus, data center load accounts for 8,015 MW, or 86%, of the total projected load growth.

Importantly, during the 5-year window through 2028 that PJM used in its RTEP analysis for the MARL Project, non-data center load for DEV is actually projected to *decrease* from 17,353 in 2024 down to 17,290 in 2028. Thus, it is clear that the need for the MARL Project is to reliably serve projected data center load growth in Northern Virginia and is not needed to serve projected non-data center load in the DOM Zone.

This projected negative growth and overall decrease in DEV's near term coincident peak demand for the non-data center customers occurs at the same time that DEV's projected data center load is increasing at a rapid rate. Thus, DEV's data center load forecast is decoupled from the load growth for the other rate classes. In contrast, if a large traditional industrial customer were to build a new large manufacturing plant in DEV's service territory, we would expect to see load growth occurring across the board in all rate classes in the vicinity of the plant.

Q10. WHAT IS THE DIFFERENCE BETWEEN A LARGE-LOAD DATA CENTER AND A TRADITIONAL LARGE-LOAD INDUSTRIAL CUSTOMER?

A10. Unlike traditional industrial customers, large investments in new data centers along with their large electric loads do not create additional electric load growth among the other

customer classes. According to the JLARC Study[7], after construction, a typical 250,000-square-foot data center may employ approximately 50 full-time workers. As a comparison, the Newport News Shipyard, with a similar load profile as a data center, currently employs about 25,000 full-time workers. In addition, there are a number of local firms that are suppliers to the Newport News Shipyard that also employ thousands of workers. All of these workers live and work in Newport News and the surrounding area supporting local grocery stores, restaurants, and big box retailers like Walmart and Costco. Thus, a new traditional industrial customer will not just cause an increase in electric load to serve the customer but also will lead to increases in residential, small commercial, and large commercial electric loads. If that were the case for new large-load data center customers, then we would expect to see that reflected in DEV's load forecast.

Q11. PLEASE EXPLAIN WHY FORECASTING DATA CENTER LOAD GROWTH IS FRAUGHT WITH SPECULATION AND UNCERTAINTY.

A11. Both PJM, DEV, and other electric utilities have many decades of knowledge and experience with serving residential, small commercial, large commercial, and traditional industrial loads. This deep knowledge and experience inform load forecasts for these non-data center customers with a relatively high degree of predictability and certainty. In contrast, data center load is a comparatively new development in both the PJM RTO and the DOM Zone and neither PJM nor DEV have equivalent levels of knowledge, experience, or historic load data to draw upon to inform their load forecasts for data centers. Indeed, in 2013, just 13 years ago, DEV reported that it had just 29 data center customers comprising

[7] The JLARC Study is available online at JLARC | Data Centers in Virginia.

a total of just 462 MW of load, or an average of 16 MW per data center.[8] With the advent of artificial intelligence ("AI") in the last few years, we are now seeing the proposed development of hyperscale data centers with loads in excess of a gigawatt ("GW").

Silicon Valley is known for its mantra of "move fast and break things." This means that the data center technology companies' business model emphasizes speed, experimentation, risk-taking, and iteration over caution and perfection. In other words, the tech industry prioritizes innovation over stability. This is the exact opposite ethos of the electric utility industry that prioritizes system reliability and rate stability above all else.

This contrast in business philosophies has created a daunting challenge for PJM and DEV. Namely, how does an industry that prioritizes reliability and safe gradual incremental change accommodate another industry that believes that unless you are breaking stuff, you are not moving fast enough? As the data center industry "bull" has crashed into the PJM "China shop," it is clear that new safeguards are required to serve this load in a way that both maintains system reliability and provides rate stability to the non-data center customers. This is particularly true for the system load forecast which underpins the need for both generation and transmission infrastructure improvements. Both PJM and the Commission are grappling with putting appropriate guardrails in place to discourage speculative data center proposals and to make data center load forecasts more accurate.

Q12. ABSENT THESE GUARDRAILS BEING PUT IN PLACE, PLEASE EXPLAIN WHY THE DATA CENTER LOAD FORECAST MAY BE INFLATED AND COMPRISED OF SPECULATIVE PROJECTS.

[8] Case No. PUR-2025-00058, Blackwell Direct at 5.

A12. Recently the Commission has approved certain safeguards for DEV that should lead to more accurate data center load forecasts. Further, additional safeguards designed to remove speculative data center projects from DEV's Large Load Queue process are currently pending before the Commission. These safeguards were not in place when PJM developed its 2022 load forecast that was used in the RTEP analysis to justify the need for the MARL Project. This lack of safeguards in 2022 potentially inflated the data center load forecast in two ways.

First, the costs of transmission and generation infrastructure required to serve large-load data centers were socialized and charged to all customer classes. This potentially incentivized data centers to contract for more load than actually needed to create "headroom" for future expansion.

Secondly, in keeping with the data center motto of "move fast and break things" and the race for dominance in the AI development space, speed to market is very important to the technology companies. In 2022, DEV did not require significant financial commitments, collateral requirements, or demonstrations of site control to advance through the various stages of data center project development, especially in the early stages. This lack of meaningful "skin in the game" potentially encouraged some data center companies to propose multiple projects in the DOM Zone while only planning to develop the one that has the fastest speed to market. This "phantom" data center load is not obvious and, in my opinion, was rolled up into both DEV's and PJM's 2022 data center load forecasts.

Q13. IS THERE ANY EVIDENCE THAT DATA CENTER CUSTOMERS HAVE OVERSTATED THEIR CONTRACT DEMANDS?

A13. Yes. The Commission established the GS-5 rate class ostensibly to respond to Large-Load data center customers in DEV's 2025 Biennial Review - Case No. PUR-2025-00058. At that time, DEV reported that there were 131 data center customers and 8 non-data center customers that will be moved to the new GS-5 rate schedule. The 131 data center customers had a combined contract capacity (demand) of 4,664.9 MW and a combined measured peak demand of 2,782.2 MW, or just 59.64% of their contract demand. Thus, the data center customers' actual peak demands are substantially lower than their contract demands.[9]

In fact, this demonstrated track record of the data centers failing to live up to their contract demands is one of the primary reasons that DEV proposed, and the Commission approved, minimum demand charges - including an 85% minimum demand charge for transmission, in the Commission's Final Order in the 2025 Biennial Review.

DEV witness Wishart explained: "Additionally, minimum bills help prevent speculative development by requiring data centers to commit to a baseline level of energy usage, discouraging them from overestimating their needs and blocking grid capacity that could be used by other customers. Minimum bill provisions also provide customers with an incentive to not overestimate their expected load when requesting service from the Company. Absent minimum bill requirements, new customers could request service based on the most optimistic forecast of future peak demand without consequence."[10]

This new minimum demand charge guardrail is expected to discourage data centers from overestimating their load requirements leading to more accurate load forecasts on a going forward basis. It is important to note, however, that this guardrail was not in place

[9] Case No. PUR-2025-00058, Abbott testimony at 33.
[10] Case No. PUR-2025-00058, Wishart Direct at 20.

during PJM's 2022 RTEP analysis. Thus, PJM most likely included 100% of the combined contract capacity (demand) of 4,664.9 MW for the 131 existing GS-5 data center customers in the RTEP analysis. However, these data centers' actual demand is only 2,782.2 MW. To put this in perspective, this reduction of 1,882 MW in actual load compared to contract load is 37% greater than the 1,370 MW nameplate capacity of the Brandon Shores generation units.

Q14. PLEASE BRIEFLY DESCRIBE DEV'S CURRENT LARGE-LOAD QUEUE PROCESS.

A14. Historically, it was not necessary for DEV to implement a formal queue process for the connection of large-load customers.[11] New large-load customers were few and far between. This all changed with the arrival of large-load data centers. To orderly handle the overwhelming amount of delivery point requests coming in for large-load data centers, DEV formalized its connection practices into a large-load queue process. This large-load queue process formalized the informal process that was previously used to study large-load delivery point requests and established protocols for how projects would progress through the queue.

DEV's large-load connection queue process was established and placed in effect in May 2025. However, the Commission determined in the 2025 Biennial Review that this process should be approved by the Commission. In the Commission's Final Order dated November 25, 2025 in Case No. PUR-2025-00058, DEV was directed to "file its new large-load interconnection queue process and standards, along with supporting testimony, in a

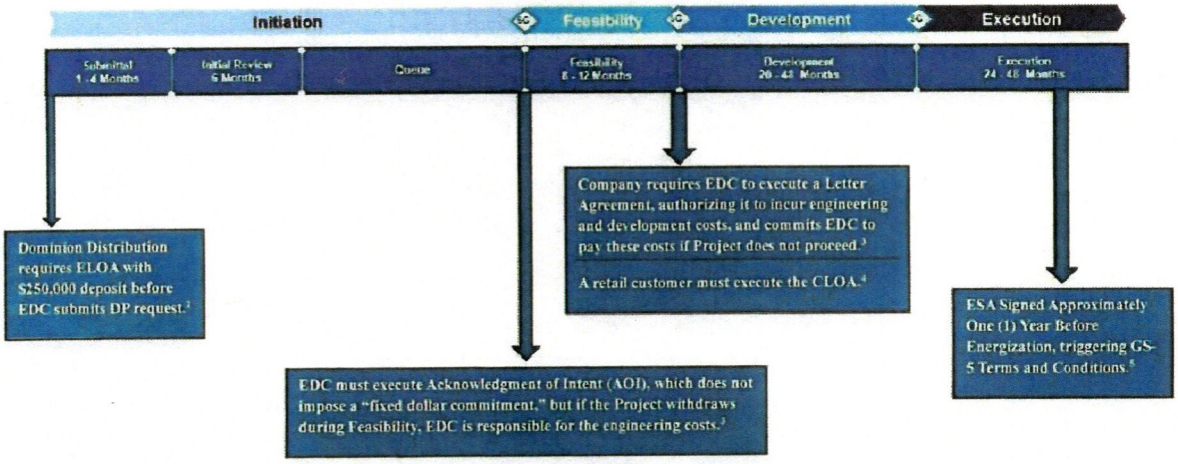
[11] A large-load customer is defined as having a load of 100 MW or greater.

separate future proceeding at the Commission."[12] DEV's Large-Load Queue case was docketed as Case No. PUR-2026-00011.

Q15. HOW DOES DEV'S LARGE-LOAD QUEUE PROCESS IMPACT PJM'S RTEP ANALYSIS?

A15. Exhibit #6 in Case No. PUR-2026-00011 displayed a demonstrative illustration of DEV's Large-Load Delivery Point Request Timeline. Exhibit #6 is included as Attachment GLA-2 and the timeline is reproduced below.

Delivery Point Request Stage Timeline[1]



Large-load data center delivery point requests are included in the load forecast and PJM's RTEP analysis at the point in the process when the requests enter the Feasibility Phase. For example, in Case No. PUR-2026-00050 (currently pending before the Commission), DEV is seeking approval of a CPCN for an RTEP baseline project to provide

[12] 2025 Biennial Review Final Order at 23.

reliable service to the Gordonsville Load Area. In the need section of the application, it states the following:[13]

> The Gordonsville Load Area has experienced increased interest from data center developers since approximately 2021. Between 2021 and 2026, the Company's Transmission Planning Group has received twenty-six Delivery Point ("DP") requests associated with ***new data center developments***, including from Dominion Energy Virginia Distribution Planning, REC, and the Town of Culpeper. The submitted DP requests are to either begin interconnection or ***study the feasibility and develop a plan to interconnect*** at least twenty-six new substations, listed below, in the Gordonsville Load Area. (emphasis added)

At the Feasibility Phase of the delivery point request process, the data center customer requesting a new delivery point has not made a meaningful financial surety commitment or adequately demonstrated site control. Thus, speculative large-load data center projects can easily enter the Feasibility Phase without consequence. This in turn can corrupt both the PJM and DEV load forecasts and drive excessive generation and transmission infrastructure investments to serve this phantom data center load.

Q16. HAS THE COMMISSION DIRECTED ANY SAFEGUARDS BE PUT IN PLACE DESIGNED TO ELIMINATE UNDULY SPECULATIVE LARGE-LOAD DATA CENTER PROJECTS FROM THE QUEUE?

A16. Case No. PUR-2026-00011 is still pending before the Commission and specific safeguards have not yet been finalized. Nevertheless, the Commission did issue an Interim Order on May 12, 2026 that directed additional proceedings be established to, among other things,

[13] Case No. PUR-2026-00050, Application at 5-6.

"allow time for the participants to try to jointly resolve the issues raised at the evidentiary hearing regarding Dominion's proposed Standards."[14]

Although final safeguards have not yet been decided, the Commission's Interim Order provided important guidance in this regard as follows.

> First, with respect to the proposed Standards, the Commission directs Dominion and the rest of the participants, including Staff, to jointly file by no later than June 12, 2026, revisions to the Standards filed by the Company on February 2, 2026. This filing should include a redlined and a clean version of the revised Standards as agreed to by the participants. The Commission appreciates the robust record that was developed in the evidentiary hearing and ***preliminarily finds that the record supports revision of the as-filed Standards to include a number of meaningful improvements***. The Commission also recognizes, however, that a number of the proposed improvements, while in the public interest, require coordination and collaboration with the Company to ensure such improvements are incorporated into the Standards in an efficient and logical manner. To accord the participants with the necessary flexibility, the Commission provides the following list of revisions it finds should be included in the revised Standards, without prescribing the precise mechanism by which they should be incorporated:
>
> - ***Enhanced site control***, or other comparable, requirements at the initial queue entry phase.
> - ***Meaningful surety***, or other comparable, requirement at the initial queue entry phase, escalating at least one time as the interconnection request progresses through the study phases.
> - Public database of interconnection requests, on an anonymized basis, updated no less than twice per year. Information in the database should include, at a minimum, the requesting Electric Distribution Company, county in which interconnecting load is requesting to be located, queue timestamp, status in queue, and size of request (in megawatts).
> - Estimated study timelines, with requirement for the Company to provide basis for delay and revised study timeline estimates if material delay is anticipated.

[14] Case No. PUR-2026-00011 Interim Order at 2-3.

- Transition plan for bringing existing queued projects into compliance with revised Standards.
- Requirement to file future, material revisions to the Standards with the Commission for review and approval.
- Any other revisions agreed to by the Company during the course of the evidentiary proceeding.[15] (Emphasis added) (footnotes omitted)

Although not yet finalized, the Commission's directives above that the final Standards include a demonstration of enhanced site control and meaningful surety at the time of initial queue entry (escalating at least one time as the delivery point request moves through the process) are important safeguards designed to discourage speculative projects from clogging the queue leading to more accurate load forecasts and preventing speculative data center projects from impacting PJM's RTEP analysis.

Q17. ARE THERE ADDITIONAL RISK VECTORS ASSOCIATED WITH DATA CENTER LOAD?

A17. Yes. The recent rapid increase in the sheer size of hyperscale data centers, especially AI data centers, presents outsized risks for transmission and generation infrastructure planning. According to DEV, the average size of a data center customer was just 16 MW in 2013. In Case No. PUR-2026-00011, DEV reported that there were 70,000 MW of data center delivery point requests in the Large-Load queue and that the largest data center project in the queue was about 3,600 MW comprised of twelve delivery points requiring twelve 300 MW substations.[16] There is a big difference between a 16 MW load that fails to develop compared to a hyperscale project with a load of a GW or more that fails to

[15] *Id.* at 3-4.
[16] Case No. PUR-2026-00011, Abbott testimony at 5.

develop. Also, there has been a significant increase in public backlash against these hyperscale data center projects and they are increasingly facing legal challenges in the court system. The Commission's recently approved, and pending, safeguards cannot mitigate this risk.

Q18. CAN YOU PROVIDE AN EXAMPLE OF THIS RISK?

A18. Yes. The Prince William Digital Gateway ("PW Digital Gateway") data center project was a proposed 2.7 GW data center complex located in Prince William County being jointly developed by QTS (1 GW) and Compass Datacenters (1.7 GW). In August 2025, a Prince William County circuit court judge ruled that the county hadn't given residents sufficient notice before the Board of Supervisors approved the rezoning in December 2023. The Court of Appeals of Virginia upheld that ruling on March 31, 2026. Consequently, Compass Datacenters terminated its involvement in the project in April 2026 and QTS announced that it was terminating the project in July 2026.[17]

Q19. WAS THE PW DIGITAL GATEWAY PROJECT INCLUDED IN THE RTEP 2022 WINDOW 3 ANALYSIS THAT SELECTED THE MARL PROJECT?

A19. That depends on whether or not the PW Digital Gateway project had entered the Feasibility Phase of DEV's interconnection process for new large-load delivery point requests and been reported to PJM for inclusion in the 2022 load forecast. The Prince William County Board of Supervisors ("Board") began its planning process for the project in July 2021 by initiating a Comprehensive Plan Amendment for the project that changed the long-range land use designation to allow for targeted industry development for data centers. The

[17] Blackstone's QTS Walks Away From Its Massive Virginia Data Center Project - Startup Fortune

planning process for the project developers would have started some time before that. Given this timeline, it is likely that the project developers would have begun DEV's interconnection process in 2021 and almost certainly would have been included in PJM's 2022 load forecast.

Unfortunately, I was not able to confirm this definitively. NEET VA's response to Ghiorzi Interrogatory No. 3-1(d) states: "No, specific end-use customers, including but not limited to data centers, hyperscale computing facilities, or other large loads, are not identified individually in any study, model, or analysis as a driver of the load growth underlying the need finding. These customers and their project load contributions, as a whole, are incorporated into the Load Forecast Reports attached to Andrew Gledhill's Direct Testimony. PJM did not analyze the extent to which individual load drivers contributed to the MARL need finding. Such an analysis is not required by PJM's planning standards, manuals or procedures, and more granular data is not available."

We can glean some insight, however, from NEET VA's response to Staff Interrogatory No. 5-29 that states: "PJM does not prepare load forecasts on a county-by-county basis. In Maryland (APS), the forecasted additional load reflected a single large, planned campus in Frederick County. In Virginia (DOM), the forecast reflected updated expectations for the DOM zone based primarily on anticipated development in Loudoun and Prince William counties, with a developing presence in Southern Virginia (Mecklenburg County)."

Thus, NEET VA states that PJM does not identify any specific end-use customers that may have contributed to the MARL need filing. However, NEET VA does specifically identify expectation for the DOM Zone being partially based on anticipated development

in Prince William County. This potentially is an indication that the PW Digital Gateway project load was indeed included in PJM's load forecast and the RTEP analysis.

I find it hard to believe that PJM does not track and is totally unaware of a potential 2.7 GW data center project like the PW Digital Gateway project on a specific end-use basis in its planning processes. This single customer load is more than double the nameplate capacity of the Brandon Shores generation units slated for retirement. If it is important to capture the impact of the retirement of the 1.37 GW Brandon Shores units in the RTEP planning analysis, and it is, then it should be equally important to capture the impact of specific data center projects of similar or greater size.

Q20. CAN THE COMMISSION CHALLENGE PJM'S FINDING OF NEED FOR THE MARL PROJECT GIVEN THE SPECULATION AND UNCERTAINTY CONTAINED IN PJM'S 2022 LOAD FORECAST?

A20. Yes. The Commission has an obligation to independently verify the underlying reliability needs, load flow modeling, and contingency analyses of any proposed high-voltage transmission project. Given the speculation and uncertainty contained in PJM's 2022 load forecast along with the recent cancellation of the PW Digital Gateway project, I recommend that the Commission consider requiring updated load flow analyses to reflect more current information and alternative input assumptions in order to "verify" the reliability need for the MARL project. Imposing such a requirement is not unprecedented. In Case No. PUE-2009-00043, the Hearing Examiner issued a Ruling on December 4, 2009 that stated:

> During the December 3, 2009, prehearing conference, updates to PATH's load-flow analyses also were discussed. Based on those discussions I find that in order for the Commission to verify PATH's

load flow modeling, contingency analyses, and reliability needs presented to justify the proposed new line, updates to PATH's load flow analyses should be submitted to reflect more current information and alternative input assumptions.

Q21. PLEASE SUMMARIZE YOUR TESTIMONY.

A21. The rapid escalation in the number and size of data center campuses reflects the evolution of the data center industry as it moves beyond cloud computing into new AI data center campuses. Indeed, PJM's data center load forecast shows explosive growth for many years into the future primarily concentrated in Virginia. This represents the greatest new demand for electricity since the invention and wide-spread adoption of air conditioning. The main difference being that electricity demand for air conditioning increased load for all customers and across all customer classes whereas the increased electricity demand to serve data centers is comprised of just a handful of some of the largest and wealthiest corporations in the world.

The MARL Project is solely needed to serve the projected load growth of a single industry - namely, the large-load data center industry in the "data center concentrated load pocket" in data center alley in Northern Virginia.

The data center load growth contained in PJM's 2022 load forecast has a high degree of uncertainty that imposes development risks to non-data center customers. Further, the 2.7 GW PW Digital Gateway project was recently cancelled. As such, an updated load flow analysis that reflects PJM's most recent load forecast adjusted to remove the PW Digital Gateway project and to reflect recently approved generation units coming on-line such as the 944 MW Chesterfield Energy Reliability Center may be required for the Commission to "verify" that the MARL project is needed.

Q22. DOES THIS CONCLUDE YOUR TESTIMONY?

A22. Yes.

CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of September, 2026 a copy of the foregoing was served by email to the parties below with copy to OHEparalegals@scc.virginia.gov:

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Dated this 30th day of September 2026,

/s/ J. Chapman Petersen
J. Chapman Petersen, Esq.

Attachment GLA-1

Gregory Abbott Testimonies/Reports

Proceeding	Case/Docket No.	On Behalf of:
Dale Service Corporation For General Increase in Rates	Virginia SCC Case No. PUE-2001-00200	Virginia SCC Staff
CPV Cunningham Creek LLC For Approval of a Generation Certificate	Virginia SCC Case No. PUE-2001-00477	Virginia SCC Staff
CPV Warren LLC For Approval of a Generation Certificate	Virginia SCC Case No. PUE-2002-00075	Virginia SCC Staff
Dale Service Corporation For Review of Changes to Terms and Conditions	Virginia SCC Case No. PUE-2002-00092	Virginia SCC Staff
Virginia Natural Gas, Inc. For Approval of a Weather Normalization Adjustment Rider	Virginia SCC Case No. PUE-2002-00237	Virginia SCC Staff
Virginia-American Water Company For General Increase in Rates	Virginia SCC Case No. PUE-2002-00375	Virginia SCC Staff
Community Electric Cooperative For Approval of Retail Access Tariffs and Terms and Conditions of Service for Retail Access	Virginia SCC Case No. PUE-2003-00007	Virginia SCC Staff
A&N Electric Cooperative For Review of Tariffs and Terms and Conditions of Service for Retail Service	Virginia SCC Case No. PUE-2003-00279	Virginia SCC Staff
Central Virginia Electric Cooperative For Approval of Its Plan to Implement Retail Access	Virginia SCC Case No. PUE-2003-00327	Virginia SCC Staff
Atmos Energy Corporation For an Increase in Rates	Virginia SCC Case No. PUE-2003-00507	Virginia SCC Staff
Virginia-American Water Company For General Increase in Rates	Virginia SCC Case No. PUE-2003-00539	Virginia SCC Staff
Washington Gas Light Company For Approval of an Experimental Weather Normalization Adjustment	Virginia SCC Case No. PUE-2001-00010	Virginia SCC Staff
Craig-Botetourt Electric Cooperative For a General Increase in Electric Rates	Virginia SCC Case No. PUE-2005-00012	Virginia SCC Staff
Virginia Natural Gas, Inc. For Approval of a Performance Based Rate Regulation Methodology	Virginia SCC Case No. PUE-2005-00057	Virginia SCC Staff

Virginia Natural Gas, Inc. For Investigation of Justness and Reasonableness of Current Rates, Charges, and Terms and Conditions of Service	Virginia SCC Case No. PUE-2005-00062	Virginia SCC Staff
Roanoke Gas Company For and Expedited Increase in Rates	Virginia SCC Case. No. PUE-2005-00075	Virginia SCC Staff
Highland New Wind Development, LLC For Approval to Construct, Own and Operate an Electric Generation Facility	Virginia SCC Case. No. PUE-2005-00101	Virginia SCC Staff
Dale Service Corporation For an Expedited Increase in Rates	Virginia SCC Case. No. PUE-2006-00070	Virginia SCC Staff
Virginia Natural Gas, Inc. For Approval of an Experimental Weather Normalization Adjustment for General Service Customers	Virginia SCC Case. No. PUE-2006-00095	Virginia SCC Staff
Roanoke Gas Company For an Expedited Increase in Rates	Virginia SCC Case. No. PUE-2006-00099	Virginia SCC Staff
CPV Warren, LLC For Approval of a Generation Certificate	Virginia SCC Case. No. PUE-2007-00018	Virginia SCC Staff
Appalachian Power Company For Adjustment to Capped Electric Rates	Virginia SCC Case. No. PUE-2007-00069	Virginia SCC Staff
Old Dominion Electric Coop. & Columbia Gas of Virginia For Approval of a Certificate to Acquire Ownership Interest	Virginia SCC Case. No. PUE-2007-00088	Virginia SCC Staff
James River Cogeneration Company For a Certificate to Operate as an Electric Generating Facility	Virginia SCC Case. No. PUE-2007-00092	Virginia SCC Staff
Spectra Energy Virginia Pipeline Co. For Cancellation of Certificates	Virginia SCC Case. No. PUE-2007-00106	Virginia SCC Staff
Appalachian Power Company For Approval to Participate in the Virginia Renewable Energy Portfolio Standard Program	Virginia SCC Case. No. PUE-2008-00003	Virginia SCC Staff
Atmos Energy Corporation For an Expedited Increase in Rates	Virginia SCC Case. No. PUE-2008-00007	Virginia SCC Staff
Virginia Electric and Power Company For Approval of a Generation Certificate	Virginia SCC Case. No. PUE-2008-00014	Virginia SCC Staff
Columbia Gas of Virginia, Inc. For Approval of an Experimental Weather Normalization Adjustment Mechanism	Virginia SCC Case. No. PUE-2008-00074	Virginia SCC Staff

Roanoke Gas Company For an Expedited Increase in Rates	Virginia SCC Case. No. PUE-2008-00088	Virginia SCC Staff
Mecklenburg Electric Cooperative For a General Increase in Electric Rates	Virginia SCC Case. No. PUE-2009-00006	Virginia SCC Staff
Virginia Electric and Power Company For Approval of Annual Filing of Rider S	Virginia SCC Case. No. PUE-2009-00011	Virginia SCC Staff
Virginia Electric and Power Company For Approval of a Rate Adjustment Clause for Recovery of the Costs of the Bear Garden Generating Station	Virginia SCC Case. No. PUE-2009-00017	Virginia SCC Staff
Washington Gas Light Company For Approval of Natural Gas Conservation and Ratemaking Efficiency Plan including a Decoupling Mechanism	Virginia SCC Case. No. PUE-2009-00064	Virginia SCC Staff
Craig-Botetourt Electric Cooperative For a General Increase in Electric Rates	Virginia SCC Case. No. PUE-2009-00065	Virginia SCC Staff
Appalachian Power Company For Approval of Purchase Power Agreements as Part of Its Participation in the Virginia Energy Portfolio Standard Program	Virginia SCC Case. No. PUE-2009-00102	Virginia SCC Staff
Columbia Gas of Virginia, Inc. For Authority to Increase Rates and Charges and to Revise the Terms and Conditions	Virginia SCC Case. No. PUE-2010-00017	Virginia SCC Staff
Virginia Electric and Power Company For Approval to Continue Two Rate Adjustment Clauses, Riders C1 and C2	Virginia SCC Case. No. PUE-2010-00084	Virginia SCC Staff
Appalachian Power Company Proposed Pilot Programs on Dynamic Rate Structures for Renewable Generation Facilities	Virginia SCC Case. No. PUE-2010-00134	Virginia SCC Staff
Virginia Natural Gas, Inc. For an Increase in Base Rates and Authority to Revise the Terms and Conditions	Virginia SCC Case. No. PUE-2010-00142	Virginia SCC Staff
Virginia Electric and Power Company For Approval to Establish an Electric Vehicle Pilot Program	Virginia SCC Case. No. PUE-2011-00014	Virginia SCC Staff
Appalachian Power Company For Approval of a Rate Adjustment Clause, RPS-RAC, to Recover the Incremental Costs of Participation in the Virginia Renewable Energy Portfolio Standard Program	Virginia SCC Case. No. PUE-2010-00034	Virginia SCC Staff

Virginia Electric and Power Company For Approval to Implement New Demand-Side Management Programs and For Approval of Two Updated Rate Adjustment Clauses	Virginia SCC Case. No. PUE-2011-00093	Virginia SCC Staff
Virginia-American Water Company For a General Increase in Rates	Virginia SCC Case. No. PUE-2011-00127	Virginia SCC Staff
Virginia Electric and Power Company To Revise a Rate Adjustment Clause: Rider R	Virginia SCC Case. No. PUE-2012-00068	Virginia SCC Staff
Virginia Electric and Power Company For Revision of Rate Adjustment Clause: Rider B	Virginia SCC Case. No. PUE-2012-00072	Virginia SCC Staff
Appalachian Power Company For Approval of the Recovery of Incremental Costs of Participation in the Renewable Energy Portfolio Program	Virginia SCC Case. No. PUE-2012-00094	Virginia SCC Staff
Virginia Electric and Power Company For Approval & Certification of Proposed Brunswick Co. Power Station	Virginia SCC Case. No. PUE-2012-00128	Virginia SCC Staff
Atmos Energy Corporation For Approval of a Special Contract for Gas Transportation Service	Virginia SCC Case. No. PUE-2013-00038	Virginia SCC Staff
Northern Virginia Electric Cooperative For Approval of Pole Attachment Rates and Terms and Conditions	Virginia SCC Case. No. PUE-2013-00055	Virginia SCC Staff
Virginia Electric and Power Company Integrated Resource Plan	Virginia SCC Case. No. PUE-2013-00088	Virginia SCC Staff
Virginia Electric and Power Company For Revision of Rate Adjustment Clause: Rider BW	Virginia SCC Case. No. PUE-2013-00122	Virginia SCC Staff
Appalachian Power Company Petition for Approval of Rate Adjustment Clause	Virginia SCC Case. No. PUE-2014-00007	Virginia SCC Staff
Appalachian Power Company Application for a 2014 Biennial Review of the Rates, Terms and Conditions for the Provision of Generation, Distribution and Transmission Services	Virginia SCC Case. No. PUE-2014-00026	Virginia SCC Staff
Virginia Electric and Power Company For Establishment of a Rate Adjustment Clause: Rider U, New Underground Distribution Facilities	Virginia SCC Case. No. PUE-2014-00089	Virginia SCC Staff
Appalachian Power Company Petition for Approval of Rate Adjustment Clause Related to its Participation in the Renewable Portfolio Energy Portfolio Program	Virginia SCC Case. No. PUE-2015-00034	Virginia SCC Staff

Virginia Electric and Power Company Integrated Resource Plan	Virginia SCC Case. No. PUE-2015-00035	Virginia SCC Staff
Washington Gas Light Company Application for Approval of a Natural Gas Supply Investment Plan	Virginia SCC Case. No. PUE-2015-00055	Virginia SCC Staff
Virginia Electric and Power Company For Approval of Special Rates, Terms and Conditions	Virginia SCC Case. No. PUE-2015-00103	Virginia SCC Staff
Virginia Electric and Power Company For Approval to Establish Experimental Companion Rates Designated Rate Schedule MBR - GS-3 and Rate Schedule MBR - GS-4	Virginia SCC Case. No. PUE-2015-00108	Virginia SCC Staff
Virginia Electric and Power Company For Establishment of a Rate Adjustment Clause: Rider U, New Underground Distribution Facilities	Virginia SCC Case. No. PUE-2015-00114	Virginia SCC Staff
Atmos Energy Corporation Application for Expedited Approval of a Special Contract for Gas Transportation Service	Virginia SCC Case. No. PUE-2015-00125	Virginia SCC Staff
Virginia Electric and Power Company Integrated Resource Plan	Virginia SCC Case. No. PUE-2016-00049	Virginia SCC Staff
Appalachian Power Company For Approval of a Rate Adjustment Clause	Virginia SCC Case. No. PUE-2016-00090	Virginia SCC Staff
Virginia Electric and Power Company For Revision of a Rate Adjustment Clause: Rider U	Virginia SCC Case. No. PUE-2016-00136	Virginia SCC Staff
Appalachian Power Company For Approval of a Wind G Rate Adjustment Clause	Virginia SCC Case. No. PUR-2017-00031	Virginia SCC Staff
Virginia Electric and Power Company Integrated Resource Plan	Virginia SCC Case. No. PUR-2017-00051	Virginia SCC Staff
Virginia Electric and Power Company For Approval to Establish Experimental Companion Tariff, Designated Schedule RF	Virginia SCC Case. No. PUR-2017-00137	Virginia SCC Staff
Virginia Electric and Power Company Integrated Resource Plan	Virginia SCC Case. No. PUR-2018-00065	Virginia SCC Staff
Virginia Electric and Power Company For Approval of a Rate Adjustment Clause, Designated Rider E	Virginia SCC Case. No. PUR-2018-00195	Virginia SCC Staff
Virginia Electric and Power Company For Approval & Certification of Proposed US-3 Solar Projects and for Approval of a Rate Adjustment Clause, Designated Rider US-3	Virginia SCC Case. No. PUR-2018-00101	Virginia SCC Staff

Virginia Electric and Power Company For Prudency Determination with Respect to the Coastal Virginia Offshore Wind Project	Virginia SCC Case. No. PUR-2018-00121	Virginia SCC Staff
Virginia Electric and Power Company For Revision of Rate Adjustment Clause: Rider US-3	Virginia SCC Case. No. PUR-2019-00104	Virginia SCC Staff
Virginia Electric and Power Company For Approval & Certification of Proposed US-4 Solar Projects and for Approval of a Rate Adjustment Clause. Designated Rider US-4	Virginia SCC Case. No. PUR-2019-00105	Virginia SCC Staff
Virginia Electric and Power Company For a Prudency Determination with Respect to the Westmoreland Solar Power Purchase Agreement	Virginia SCC Case. No. PUR-2019-00133	Virginia SCC Staff
Virginia Electric and Power Company Integrated Resource Plan	Virginia SCC Case. No. PUR-2020-00035	Virginia SCC Staff
Virginia Electric and Power Company Establishing 2020 RPS Proceeding	Virginia SCC Case. No. PUR-2020-00134	Virginia SCC Staff
Appalachian Power Company Establishing 2020 RPS Proceeding	Virginia SCC Case. No. PUR-2020-00135	Virginia SCC Staff
Virginia Electric and Power Company Allocating RPS Costs to Certain Customers of Virginia Electric and Power Company	Virginia SCC Case. No. PUR-2020-00164	Virginia SCC Staff
Virginia Electric and Power Company To Revise Its Fuel Factor	Virginia SCC Case. No. PUR-2022-00064	Appalachian Voices
Appalachian Power Company 2022 Integrated Resource Plan Filing	Virginia SCC Case. No. PUR-2022-00051	Appalachian Voices
Roanoke Gas Company For an Expedited Rate Increase	Virginia SCC Case. No. PUR-2022-00205	Roanoke Gas Company
Virginia Electric and Power Company For Approval of its 2022 RPS Development Plan	Virginia SCC Case. No. PUR-2022-00124	Appalachian Voices
Virginia Electric and Power Company For Reinstatement and Revision of a Rate Adjustment Clause Designated Rider RGGI	Virginia SCC Case. No. PUR-2023-00070	Appalachian Voices
Appalachian Power Company For Triennial Rate Review	Virginia SCC Case. No. PUR-2023-00002	Appalachian Voices
Virginia Electric and Power Company 2023 Integrated Resource Plan Filing	Virginia SCC Case. No. PUR-2023-00066	Appalachian Voices
Virginia Electric and Power Company For Approval of its 2023 RPS Development Plan	Virginia SCC Case. No. PUR-2023-00142	Appalachian Voices
Roanoke Gas Company For Approval of a General Rate Increase	Virginia SCC Case. No. PUR-2024-00006	Roanoke Gas Company

Appalachian Power Company For Biennial Rate Review	Virginia SCC Case. No. PUR-2024-00024	Appalachian Voices
Virginia Electric and Power Company For Approval of rate adjustment clause designated Rider GEN	Virginia SCC Case. No. PUR-2024-00097	Appalachian Voices
Virginia Electric and Power Company For Approval and Certification of Electric Transmission Facilities	Virginia SCC Case. No. PUR-2024-00135	ReisingerGoochPLC
Virginia Electric and Power Company For Approval of its 2024 RPS Development Plan	Virginia SCC Case. No. PUR-2024-00147	Appalachian Voices
Virginia Electric and Power Company For Biennial Rate Review	Virginia SCC Case. No. PUR-2025-00058	ReisingerGoochPLC
Virginia Electric and Power Company For Approval of Its Large-Load Connection Queue Process	Virginia SCC Case. No. PUR-2026-00011	Piedmont Environmental Council
Virginia Electric and Power Company For Approval of a rate adjustment clause Rider T-1	Virginia SCC Case. No. PUR-2026-00056	Piedmont Environmental Council

Attachment GLA-2

JEHMAL T. HUDSON
COMMISSIONER

SAMUEL T. TOWELL
COMMISSIONER

KELSEY A. BAGOT
COMMISSIONER

COMMONWEALTH OF VIRGINIA

STATE CORPORATION COMMISSION

BERNARD LOGAN
CLERK OF THE COMMISSION
P.O. BOX 1197
RICHMOND, VIRGINIA 23218-1197

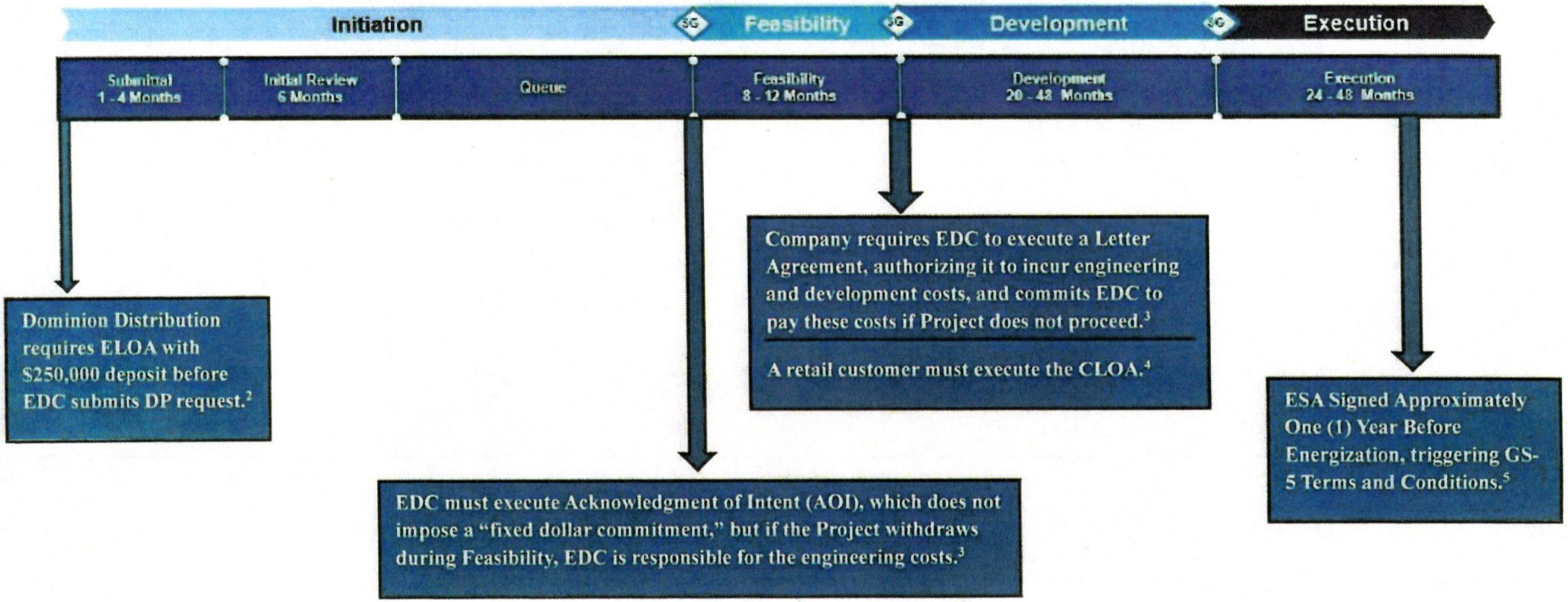
State Corporation Commission
RECEIVED
04/29/2026

Case No.: PUR-2026-00011
Sponsor: WALMART
Exhibit No.: 6

Witness: JACQUELINE R. VITIELLO
Bailiff: JABARI T. ROBINSON

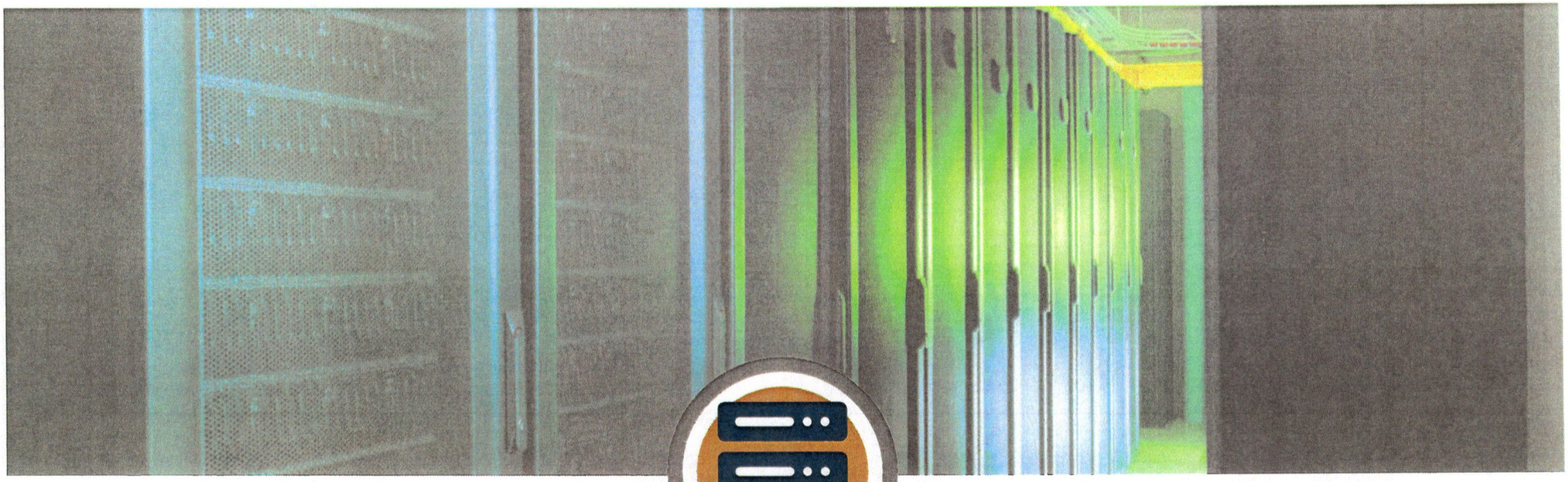
WALMART EXHIBIT 1: Financial Commitments During Delivery Point Request Stage Timeline

Delivery Point Request Stage Timeline[1]



[1] Direct Testimony of Company witness Jacqueline R. Vitiello, p. 4, Fig. 1.
[2] Company's Response to Google 1-10(c)(d), included as Attachment CB-2, p. 5 to the Direct Testimony of Cameron Brooks ("Brooks Direct").
[3] Company's Response to Staff 01-19, included as Attachment CB-2 to Brooks Direct.
[4] Company's Response to Staff 03-55.
[5] Company's Response to Google 2-6(b), included as Attachment CAB-4 to the Direct Testimony of Carolyn Berry, Ph.D.

EXHIBIT #6



Data Centers

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Responsible Data center Development Plan

Data centers are critical to national security, global competitiveness, and everyday life. Demand for secure, reliable digital infrastructure is at an all-time high, and West Virginia is ready.

The Mountain State offers one of the most strategic locations in the United States for data center investment, development, and expansion.

West Virginia delivers resilience. With unmatched energy production, abundant baseload power, and flexible microgrid capacity, the state brings the scalability and reliability modern data centers demand.

By choosing West Virginia, data center operators aren't just meeting today's digital demands. They're positioning themselves to lead tomorrow's energy-driven economy.

Fast Deployment, No Barriers

West Virginia removes roadblocks so data centers can launch quickly and scale seamlessly:

- Unlimited microgrid freedom and capacity
- Ability to sell excess electricity on the wholesale market
- Dedicated liaisons for rapid permitting and streamlined approvals
- Strong state leadership committed to digital infrastructure and economic growth

High Impact Data Center Program

Begin HIDC Certification Process

HIDC Petition Form

Certified Microgrid Development Program

Certified Microgrid Application Directions

MG Development Program Petition Form

House Bill 2014

Business Assistance Brochure

Contact Us

The West Virginia Advantage

- **Prime Location**
  - Within a day's drive of half the U.S. population and close to Washington, D.C. and major federal institutions.
- **Reliable Power, Unlimited Scalability**
  - A national energy leader (#2 in coal, #4 in natural gas) with policies to double baseload generation and meet growing demand.
- **Skilled Workforce, Built for Industry**
  - Stable, experienced, and strengthened by programs like the **PowerTec Training Center**.
- **Dependable Water Resources**
  - More than 32,000 miles of rivers and streams plus consistent rainfall ensure cooling capacity.
- **Pro-Business Climate**
  - Low taxes, streamlined regulations, one-stop permitting, and state preemption of local barriers create a welcoming environment for investment.

Partnerships That Power Growth

West Virginia collaborates with leading partners to ensure reliable, scalable digital infrastructure:

- **AEP, FirstEnergy, and Dominion** for transmission readiness
- **Oak Ridge National Laboratory** for grid modeling and planning

- **Class VI carbon injection primacy** – one of only four states with this authority

Your Future Starts Here

West Virginia is ready for America's data demands.

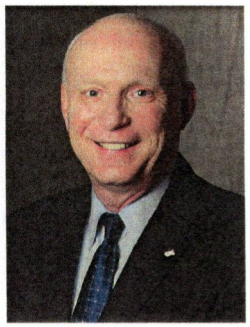
Build your future where energy, workforce, and opportunity meet.

Industry Consultants

Get in Touch

Connect with one of our experienced consultants for assistance in site selection, business development or navigating local government regulations.

Business Attraction



Todd Hooker



Samantha Smith

West Virginia Data Economy Office



Chris Morris

Director of the West Virginia Data Economy Office



Heather Vanater

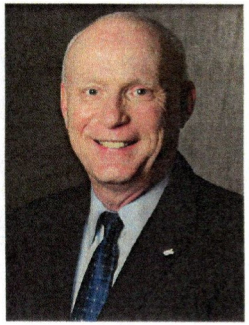
Deputy Director of the West Virginia Data Economy Office



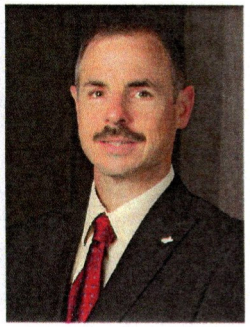
Alex Stavrulakis

Data Infrastructure Program Manager

Business Retention & Expansion



Todd Hooker



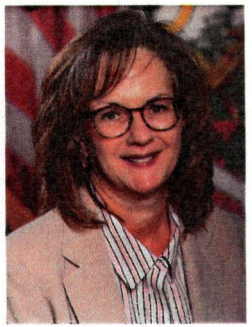
Matt Borror



Chris Pauley



Jennifer Rohrig



Leanne Stowers



Samantha Smith

International Division



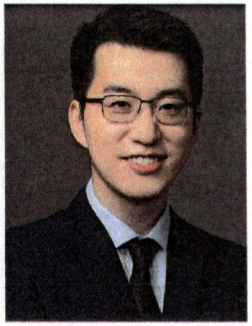
Hollie Hubbert



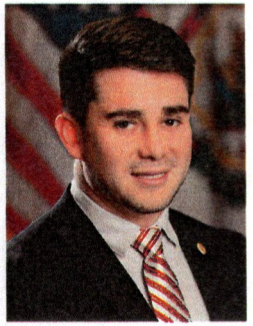
Angela Mascia



Atsuko Murayama



Ricky Lee



Jesus Velasco



Hanna Kruhlova

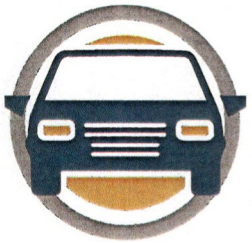
Thriving Industries



AEROSPACE



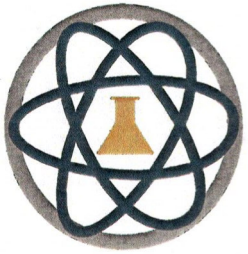
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BUILDING PRODUCTS



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