Jefferson County Commission
124 E Washington Street
Charles Town, WV, 25414

November 5, 2026

Via certified mail, return receipt requested

Valley Link Transmission Company, LLC
Attn: Isaac Rhoades, President
c/o FirstEnergy Transmission
901 Wilson Street
Martinsburg, WV 25401

cc: Executive Secretary, Public Service Commission of West Virginia, 201 Brooks Street, P.O. Box 812, Charleston, WV 25323

Re: Valley North 765-kV Project November 18, 2026, Meeting

Dear Mr. Rhoades;

Sir, your letter of October 13, 2026, states, with reference to your open houses, "There is no formal presentation" and twice in the brochure a similar comment is highlighted. Our commission finds this unacceptable. As you know, any new transmission line in West Virginia should first be shown to be needed, the decision should rest on solid data, and West Virginia families and businesses should not pay for lines built to serve demand somewhere else.

Valley Link has invited Jefferson County residents to its open house on Wednesday, November 18, from 4 to 7 p.m. at the Ranson Civic Center to see potential routes and give feedback. Our members will be there. But unlike your meeting in Shepherdstown, our constituents and your customers expect the following:

1. A presentation to the group of attendees on the Valley North project (not a bunch of tables where your customers walk from table to table trying to get answers).
2. Truthful and accurate responses to questions.
3. Respectful, substantive discussions between your representatives and your customers/our constituents.

We are sharing below some of the questions we have heard raised – it is not an exhaustive list so there will likely be additional questions.

We ask Valley Link to be prepared to respond either in their formal presentation or in the discussion that will follow.

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Preliminary list of questions

Below several topic areas have been highlighted along with the questions we would like to see addressed by Valley Link in their presentation. Valley Link's presentation on each topic is likely to generate more questions which we would like to see addressed and discussed with your customers and our constituents.

Public Convenience and Necessity: As Valley Link leadership is aware, to receive a certificate of public convenience and necessity Valley North must present a credible case based on facts that allow the West Virginia Public Service Commission to conclude Valley North will 1) contribute economically, adequately and reliably to power needs or regional reliability; 2) serve the best interests of West Virginia customers and citizens; and 3) achieve an acceptable balance between power needs and environmental factors West Virginia Code § 24-2-11a. PJM's February 6, 2026, presentation lists West Virginia at 1% of projected large-load growth by 2035/36 (68,977 MW total). .

1. Please provide specifics as to how Valley North benefits West Virginians. We think it is reasonable to ask Valley North to provide detailed examples with quantification.
2. By PJM member, who will benefit from the 765kV line?
3. By PJM members, which classes of customers (e.g. residential, commercial, data centers, agricultural, etc.) provide the load to meet the 765kV need?
4. As noted above one percent of the 765kV line will be needed to serve West Virginians – what percent will be needed to meet the demands of other states?
5. PJM's demand forecast has changed since it picked this project. Has anyone confirmed Valley North is still needed, at this size and on these routes?

Project Costs and Residential Rates: No utility executive would commit to a project of the magnitude of the Valley North project. Similarly, no customer wants to support an electric project without knowing how it will affect their monthly electric bill.

1. How much will the Valley North project cost?
2. How much of the total Valley North project cost be incurred in Maryland, Virginia, and West Virginia?
3. How much of the total project cost will be borne by West Virginians?
4. By rate class, how much will monthly West Virginian electric bills increase due to Valley North?
5. How many years will the recovery of Valley North be on West Virginian's bills?
6. Valley Link and PJM have alluded to the fact that data centers are driving much of the demand growth. Will data centers pay their share of this line, or will West Virgina ratepayers?
7. If the data center demand used to justify Valley North is delayed, shrinks, or never shows up, who pays for the transmission line stranded costs?

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Project Benefits: In a similar vein to project costs, West Virginians would like to understand the benefits they will derive from Valley North. The benefits stated by Valley Link include property taxes, school aid, etc.

1. What quantifiable benefits will West Virginia and Jefferson County receive from the Valley North project?
2. How were these benefits calculated?
3. Valley Link promises $994,000 a year in property taxes for Jefferson County and nearly $14 million statewide, please provide the details behind these numbers.
4. Will property taxes be credited to ratepayers through electric bills?
5. Under West Virginia's school aid formula, when a county's property values rise, its expected local share goes up, and its state aid goes down. How much of the nearly $9 million you advertise for schools would be offset by lower state aid, and how much truly new money is for each school system?
6. How many permanent jobs will Jefferson County see if Valley North proceeds.
7. Valley Link has made general statements regarding reliability improvements in West Virginia please provide specific details regarding this benefit.

Property Values: We are sure Valley Link leaders understand our constituents' concerns about the effect Valley North transmissions lines, towers, and infrastructure on property values. Our constituents have several questions regarding property values.

1. Which of the four property-value studies you cite looked at 765-kV lines or towers this tall, or at a new line built through a rural county like this one?
2. The 2023 study you cite found homes near transmission lines sold at a discount. Why does your page leave that out?
3. Will you pay for lost value on the rest of a property outside the easement, and for neighbors the line does not cross?

Ground water and karst geography: Valley Link says it will identify springs, caves, wetlands and other sensitive features "before construction begins." In Jefferson County that must happen before the route is chosen. The U.S. Geological Survey found that approximately 86 percent of the county sits on karst, where its dye tests showed groundwater moving as fast as 840 feet a day and reaching a stream more than 4 miles away within two weeks. Two of those tests were near Rippon and Summit Point, where your remaining routes now run (USGS Report 90-4118, 1991). Many of our residents' primary sources of water are wells and utility-distributed ground water. Our residents have many questions concerning the effect Valley North will have on our ground water.

1. Will you complete and publish a karst and groundwater study of each Jefferson County route before you choose a preferred route and before you file with the PSC?
2. What karst work have you done in Jefferson County so far, and did it change which routes you kept or dropped?
3. How many private wells, springs, sinkholes and caves are within a quarter mile of each remaining route?

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4. How will you handle blasting, foundation drilling, drilling fluids, dewatering, access roads and herbicides in karst, and who checks that it is done right?
5. Will you test private wells and springs before and after construction, and replace (and pay the ongoing cost of those residents who lost their wells) any water supply that is harmed, without making the owner prove what caused it?
6. Will you guarantee that any herbicides used to control vegetation under the transmission lines will not leech into our groundwater?

Proposed Routes: Valley Link's new county maps show a narrowed set of potential routes and preliminary rights-of-way across southern Jefferson County, but no tower locations or access roads, and no explanation of why earlier segments were kept or dropped. Valley Link says the project will benefit every community it reaches, yet it has identified no delivery point or new substation in Jefferson County. And it says it aims to avoid eminent domain, which is not a promise. Since Valley Link did not meet with any affected landowners before initial route proposal and has not met with any to discuss the revised route map, our landowners have numerous questions. An initial set of questions is listed below:

1. Why were each of the earlier Jefferson County study segments kept or dropped?
2. What criteria did you use to keep or drop a segment, and how were they scored?
3. Did you study routes along existing highways, rail, or transmission corridors (the Trump administration America's Great Corridors of Commerce Initiative)? If so, why were they rejected?
4. Will you release the GIS files, right-of-way, and preliminary tower and access road locations for each Jefferson County route?
5. Please explain Valley Link's voluntary-acquisition process, when it seeks condemnation, how it will document landowner outreach, and what steps it will take to avoid or reduce property impacts.
6. How will access roads and construction be addressed?

Wild and Wonderful Historic West Virginia: We assume Valley Link's leaders are aware of the historical significance and the beauty of Jefferson County. The history and scenery have a very significant effect on the State and Jefferson County's economies and quality of life? Our residents want to know if and how you took into consideration the natural beauty and historical sites into consideration when selecting the routes.

1. Do you have list of all historic sites the proposed route crosses?
2. Do you have a map of the battlefields the proposed route crosses?
3. Did you consider viewsheds when selecting the route, if yes can you please share the detailed analysis and the criteria for making choices?
4. Can you share route specific visual materials, so we understand the impact on our vistas and historic areas?

Family Farms, Agricultural Operations, and Rural Land Use: Jefferson County is a rural county with numerous (and often multi-generational) family farms and agricultural businesses. In 2000 Jefferson County Commission under WV Code 8A-12-1 et seq. created the Jefferson County Farm Protection Board to acquire and conserve Jefferson County farmland. The

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proposed route gives very little consideration to this critical part of our economy. The line cuts through properties without addressing the needs of the farmers or their operations. We believe it reflects the fact that very little thought was put into the choice of route. This is unacceptable. We believe it important for Valley Link to undertake a comprehensive review to show how farms are affected, alternatives being considered, and how the route will be changed to address rural businesses and people and the State and County's quarter century commitment to farmland conservation.

1. How many farms and agricultural businesses would each route affect?
2. How will Valley Link treat farmland that is in conservation easement?
3. What easement payments would landowners receive, and would payments be one-time or recurring?
4. How will Valley North address the potential risk to livestock from the 765kV lines – e.g. stray voltage?
5. How would Valley Link address impacts on farm operations, fields and access roads?

Health Questions: Several of our residents have questions regarding the potential effect the 765kV lines could have on their physical wellbeing. In your Valley North brochure you mention EMF but this is only one health topic residents have raised. For each of the questions raised below we would like to receive any research you have undertaken and any academic papers on the topic.

1. What impact will the prolonged exposure to high intensity energy have on individuals who live near the Valley North lines?
2. Will there 765kV lines affect medical devices such as pacemakers?
3. Numerous members of our community have titanium joint implants and our residents living close to the proposed line want to know of any affect the lines may have?

Conclusion

These are the questions Jefferson County residents are already asking. Valley Link has not demonstrated that it has conducted adequate due diligence regarding lawful access to affected properties, the historic character of the area, or the agricultural impacts on landowners. If the people staffing the Ranson open house cannot answer these questions, residents will reasonably conclude that the answers do not yet exist, and that will matter when Valley Link asks the Commission to approve a route through this county.

Numerous residents found the Shepherdstown open house to be frustrating and not helpful. If Ranson is to be more productive we encourage Valley Link to provide materials beforehand and to not refuse to share information (e.g. GIS maps have been previously requested by the Commission). The Ranson meeting is part of the required consultation process; therefore, we believe it important for Valley Link to provide written responses to our questions after the meeting. These responses should be available no later than December 15, 2026.

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We would welcome a meeting with the project team before November 18.

Sincerely,

Jefferson County Commission

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