



ProtectPWC.org

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NO to new on-site generator guidance

The observation of the Coalition to Protect Prince William County is fairly simple. What this new proposed DEQ “guidance” demonstrates is that our public utility system is broken.

We reject any more ‘solutions’ that will harm residents and wildlife due to a totally foreseeable problem that has been created due to complete lack of oversight by any elected body.

NO guidance should be considered or approved until the counties most impacted in the Commonwealth have an opportunity to have a full meeting with DEQ representatives.

It appears - as in 2023 when DEQ was tapped to provide cover for emergency data center diesel generators to prevent grid collapse during peak load stress from March until June - that once again the underlying purpose of this *new* guidance is actually no different. At its core, the use of data center backup generators, primarily diesel, to run during ‘planned outages’ is to allow the data center industry to continue to operate outside of a grid which is experiencing extreme stress because of that one industry’s excessive load demand.

In particular, we know that one transmission line, Morrisville to Wishing star is one of those problem ‘child’ transmission lines. Originally that line was intended to be a one hundred percent wreck and rebuild expansion project, but in a subsequent Dominion Energy sponsored PWEEG (Prince William Energy Engagement Group) meeting with PWC stakeholders in March of 2025, Dominion reps explained that in order to meet the load demand in an acceptable time for the data center industry, a total wreck and rebuild was not possible.

The reason we are including the following conversation with Dominion Energy from the March 10th of 2025 PWEEG meeting is because it is imperative that what is happening to our grid has as much transparency as possible.

How can we have a factual open discussion about WHY this DEQ guidance is being recommended if the cause is omitted from the policy? Accountability is missing from this highly unusual recommendation to add yet ANOTHER layer for the highest energy hog in Virginia to rely on its backup generators. ????

Morrisville to Wishing Star – PWEEG: March 10, 2025:

*Dominion Rep - DR : The first consideration for this project was a wreck and rebuild of the entire corridor, so taking down those existing lattices and rebuilding them as three monopoles, essentially what's there now would become two monopoles..... The original consideration was doing that all within the existing right of way. In order to do that, **you would have to do basically what we call get an outage along this corridor, an outage is taking those lines out of service. Wrecking and rebuilding lines you can't have power going along those lines. Now an outage, as a reminder, does not mean you are cutting off power to customers. An outage simply means you are diverting power to other infrastructure to carry that power while we perform the work we need to do.***

We could not get the necessary outages for this project in the schedule that we needed to get through.

PWEEG stakeholder : I believe you said this would create a safety and reliability issue?

DR: It is a safety issue, it is a reliability issue

PWEEG: When you say in the time frame that you needed it, does that mean maybe you could have done one line at a time but that would have taken too long?

DR: This project, the new 500 line needs to be in service by 2032.

PWEEG: What is triggering that

DR: Load growth

PWEEG : I understand that, but ah

DR : I know you want me to say Data Centers

PWEEG: Based on service agreements

PWEEG : This is a fairly new line, it doesn't need to be serviced because it's old, we are talking about expansion in a sensitive area with a lot of data center growth

DR: So the load growth for the new 500 line certainly is driven by data center load growth in this area and Loudoun

PWEEG : But the time frames specifically, that is due to the in-service agreements (data center) that is set in the contracts, is that right?

DR : This is more for reliability as well, now certainly planned power for customers in service dates, that is a driving factor.

The Coalition to Protect Prince William County is asking Virginia DEQ: How many planned outages are a result of new transmission lines being built to manage the unprecedented load demand of the data centers?

No honest discussion about energy infrastructure can deny the plain facts about the crisis data center load demand is creating on our grid.

[Members of America's Largest Power Grid Can't Agree on How to Power Data Centers - Inside Climate News](#)

“With no consensus among stakeholders, PJM Interconnection’s 10-member board now must craft a policy for surging data-center demand that has already driven up electricity prices for millions.”

“During the meeting, PJM members—hundreds of representatives, most from the energy industry—reviewed a final slate of a dozen proposals and cast advisory votes on each of them. The options ranged from requiring or nudging data centers to bring their own generation, to creating a new fast track for connecting energy projects to the grid, to temporarily halting new data-center hookups altogether until PJM can reliably serve them.”

[No more PJM data centers unless they can be reliably served: market monitor | Utility Dive](#)

“...PJM is considering proposing to allow data center loads that it cannot serve reliably and that will require periodic blackouts for data centers and other customers, Monitoring Analytics, the grid operator’s market monitor, said.”

*“That result is not consistent with the basic responsibility of PJM to maintain a reliable grid and is therefore **not just and reasonable**,” Monitoring Analytics said.*

Virginia residents demand to understand: **What is the actual plan** to protect our grid AND protect our right to clean air. Even our regional grid operator PJM can’t come up with a solution.

The stated role of the Virginia DEQ is:

“DEQ's Mission is to protect and enhance the environment of Virginia in order to promote the health and well-being of the Commonwealth's citizens, residents, and visitors in accordance with applicable laws and regulations.”

“DEQ's Vision is that all Virginians enjoy cleaner water, better air quality and the productive reuse of land that was once contaminated.”

The new DEQ guidance is to ensure that one industry, the Data Center Industry, continues to operate at full capacity.

Why does DEQ feel it is their responsibility to maximize the profits for one economic customer? Has this policy now been added to the DEQ ‘Mission’ statement?

What is the goal of the proposed DEQ guidance? Is it to serve the health and well-being of The People, or one industry?

The demands being placed on all of US to ensure the industry causing the crisis does not have to feel the effects of their unconstrained power need is the antithesis of accountability.

There is no other ‘customer’ that demands as much energy as the Data Center industry, to the point where the entire Dominion Energy grid is being subsumed.

Would we need new ‘guidance’ for running generators for ‘planned outages’ if it were not for the Data Center load demand? No.

Dominion Energy is in a race to provide power to the Data Center industry -- of that there is no debate or question. And yes, they must ‘serve’ their customers, all of them, but there is one word that is often left out of the equation to serve: ‘REASONABLE.’

So, the question that remains: Is this accelerated time to build out new energy infrastructure predicated on a time frame to meet Dominion Energy’s promised electrical contracts ‘reasonable?’

What is being sacrificed to meet this man-made timeline?

Here are the questions from the community that we believe deserve an open process and a public meeting with all stakeholders. Several may look familiar, because they are actually a cut and paste from the questions we asked in 2023, when DEQ proposed a waiver for emergency use of data center diesel generators.

What we know, currently, is backup generation for 'planned outages' cannot be the data centers' existing on site backup generators. Therefore, mobile generators must be brought on site.

- 1) Does this pose an even higher air quality risk to the community? What studies have been done to evaluate this risk? And if they have been done, where is the data that will be shared with elected officials and community members?
- 2) If the Data Centers do NOT bring on the required mobile generators, and instead utilize their current likely Tier II generators, what is the risk to air quality?
- 3) Is DEQ now an official 'economic partner' in the Commonwealth, either with the Virginia Chamber of Commerce, the SCC, or Dominion Energy?
- 4) If the generators are NOT '**allowed**' to kick on, what will happen?
- 5) The primary job of DEQ is the health and welfare of citizens. How is DEQ fulfilling that role if they allow dirty diesel generators to be utilized en masse near homes, schools, and other areas that will impair air quality?
- 6) There is clearly coordination with the utility companies, but where is DEQ's coordination with local elected leaders? with citizens? DEQ is not offering an alternative, just giving notice.
- 7) What does a "Maximum Generation Emergency/Load Management Alert" mean and what happens if the data centers do NOT switch to dirty diesel?
- 8) How is DEQ measuring, EVERY time the generators kick on, and during the duration and sometime thereafter the exact number of particulates AND other pollution matter that will be emitted into the air that citizens are breathing?
- 9) Exactly what is the radius of those who are most at risk in proximity to these thousands of generators, and in what way will you be sending a public warning system to those at risk so they are prepared to protect their health? What will you be recommending? Will you recommend staying indoors? Wearing masks?

The Coalition used this analogy before: DEQ is rewarding the arsonist who set the house on fire with a lifeline. We 'could' argue Tier II vs Tier IV and why which one is better than the other, but is that really the crux of the dilemma our communities are facing?

At the end of the day, NEITHER is intended to run at this magnitude for power that may be needed to keep their servers and coolers running. We have come to a place where the ridiculous is being proposed as the possible. NEVER should we have allowed any industry to introduce EITHER kind of backup generators at this scale.

We reject any more 'solutions' that will harm residents and wildlife due to a totally foreseeable problem that has been created due to complete lack of oversight by any elected body.

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