



March 27, 2023

Mike Rolband
Director
Virginia Department of Environmental Quality
P.O. Box 1105
Richmond, VA 23218

Dear Director Rolband,

The Data Center Coalition (DCC) appreciates that the Virginia Department of Environmental Quality (DEQ) has considered potential tools to help address the transmission constraint issue in Eastern Loudoun County that Dominion Energy announced in summer 2022. DCC understands the intent of the new proposed variance released on March 7, 2023 was to serve as a temporary and voluntary tool for one or more data centers to run their emergency back-up generators if requested by regional transmission organization PJM to alleviate demand on the electric grid during periods of potential acute stress that may occur in Loudoun County during the March 2023 - July 2023 summer peak.

However, there are important and unresolved technical, federal regulatory, and operational challenges with this variance. Due to these issues, no DCC member has indicated they would use the variance. DEQ also indicated in its March 7, 2023 notice that it did not anticipate any data center would need to use the variance, noting that it is precautionary and redundant and does not ensure compliance with the U.S. Environmental Protection Agency's rules and regulations. For these reasons, we respectfully request that DEQ withdraw the new variance.

We recognize that data centers can play an important role in bringing stability to the grid. In some states, this includes programs and initiatives managed by grid operators and utilities designed to give the option to large users of electricity to shed load through various means for the benefit of other business and residential customers when there is acute grid stress or occasional peak demand. While we are not aware of a program currently offered through Dominion Energy, we welcome the opportunity to work with the Administration, DEQ and other government agencies, PJM, utilities, and other stakeholders to identify and implement holistic solutions and programs to address the transmission constraint in Eastern Loudoun County and ensure a strong, resilient, and reliable grid.

Sincerely,

A handwritten signature in black ink that reads "Josh Levi".

Josh Levi
President
Data Center Coalition