INDEPENDENT CASE STUDY

# Culpeper County, Virginia

## A Data Center Case Study

Gigawatts without a war: how one square mile absorbed the second wave

Companion to What Virginia Is Spending, What Virginia Is Getting

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# CASE STUDY: CULPEPER COUNTY

*Gigawatts Without a War: How One Square Mile Absorbed the Second Wave*

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## ABSTRACT

Culpeper County holds one of the largest accumulations of data center entitlements in Virginia's diffusion ring: roughly 11 million square feet built or approved on the nine sites this report inventories (press counts run from 10 to 13 million), and 2,435 megawatts of delivery-point requests by Dominion's own May 2026 count.[1] It assembled that inventory without a Digital Gateway, a Mountain Road, or a marquee lawsuit that anyone outside the county can name. This report asks whether the quiet is real, bought, or simply early, and answers: none of those, exactly. The quiet is an artifact of institutional design. Beginning in 2021 the county consolidated five scattered technology zones into a single incentive district along McDevitt Drive, 690 acres by a June 2024 trade-press account and 950 acres on the county's own economic development page in 2026, a corridor that had hosted secure data infrastructure since the Federal Reserve buried its currency reserve in Mount Pony, and made data centers a by-right use there.[2] By-right development needs no rezoning and no hearing, so it generates no visible politics. Of the five campuses that filled the zone (CloudHQ, DataBank, the Peterson-assembled campus now owned by STACK, EdgeCore, Red Ace), two, CloudHQ and DataBank, went to no vote of their own (an adjacent 100-acre parcel that may be or adjoin CloudHQ's ground was rezoned unanimously) and three passed rezoning votes, unanimous, 5-2 and 4-3, without an organized opposition campaign in the sources read for this report. Outside the zone, where the industry needed a discretionary vote, Culpeper fought like everywhere else: a 4-3 board vote and a citizen lawsuit over Amazon's Stevensburg rezoning in 2022, a developer twice run out of Brandy Station, a veterans' fight at the gates of the National Cemetery. The report documents the design, the approvals, the two-government structure that let an incorporated town with its own water, sewer, and electric utilities monetize the buildout while declining its load, and the tightening that began once the zone filled: a unanimous 2025 ordinance ending by-right use outside the zone, a town ordinance effectively prohibiting new data centers inside it, a board election that replaced three supervisors, and a 2026 transmission fight that has turned the county against the regional grid buildout its own approvals helped summon. The null case turns out to be a case about where conflict goes when the front door is closed.

## PURPOSE, SCOPE, AND METHOD

This report is a case study of Culpeper County, prepared to the same standard as the Henrico, Hanover, Chesterfield, and Orange case studies and intended, like them, to be readable as a standalone public document. It covers the period from the county's first technology-zone expansion proposals through the evidence snapshot of June 12, 2026, with the 2022 Amazon rezoning as the start of the contemporary buildout. Items dated after the snapshot, through October 24, 2026, are stated with their dates and sources. Sources are public: county and town meeting records where accessible, the Culpeper Star-Exponent's continuous beat coverage, the Culpeper Times (now publishing under InsideNoVa), trade press (Data Center Dynamics, Data Center Frontier, Data Center Knowledge, Baxtel), State Corporation Commission filings, Piedmont Environmental Council materials, and statewide reporting from the Virginia Mercury and Cardinal News. Claims that rest on secondary sources or that could not be verified against a primary record are flagged with an asterisk in the endnotes; Part Eleven consolidates those flags as open documentary items.

One discipline governs the whole report. Culpeper is two governments. Culpeper County, population roughly 55,000, acts through a seven-member Board of Supervisors and a county Planning Commission. The Town of Culpeper, population roughly 20,000, is an incorporated town inside the county, the county seat, with its own council, its own planning commission, its own zoning ordinance, and its own water, sewer, and electric utilities.[3] The technology zone corridor sits astride the line between them. Most published coverage blurs the two; this report does not. No sentence below says "Culpeper decided" without saying which Culpeper.

# PART ONE: THE INHERITANCE

## The Pathway County

Culpeper's secure data infrastructure dates to the 1960s. In 1969 the Federal Reserve built a hardened facility inside Mount Pony, east of the town, that came to hold billions in currency reserves and, more consequentially, the Culpeper Switch: the communications node through which Fedwire moved the nation's interbank transfers. The Switch drew SWIFT, the international payments cooperative, which still operates a roughly 90,000-square-foot facility in the county. Terremark built the NAP of the Capital Region on McDevitt Drive in 2007-08; Verizon bought it in 2011 and Equinix in 2016, and the four-building campus now runs about 172,500 square feet and 62.5 megawatts.[4] When the modern wave arrived, Culpeper was one of the few counties in the diffusion ring with an existing footprint, existing fiber, and a county government that had spent years marketing the corridor.

The county's economic development director described the position precisely: a "pathway community," watching the industry grow outward from Loudoun and Prince William and preparing for its arrival rather than recruiting it. "We were prepared for when it did, and it's now since arrived."[5] Data Center Dynamics' November 2024 analysis of the post-Loudoun diffusion treated Culpeper as the test of whether any second-ring county could become "the new Ashburn," and concluded it would not, partly because the county itself said so: officials reported turning away inquiries for 500-acre, multi-gigawatt campuses as beyond what the county wanted.[5]

## What Arrived

The inventory as of the snapshot, by campus:

| Campus | Developer/ owner | Location | Scale | Status |
|---|---|---|---|---|
| Equinix CU1-CU4 | Equinix (ex-Terremark) | McDevitt Dr. (county) | 172,534 sq ft / 62.5 MW | Operating since 2008-09 |
| SWIFT | SWIFT | McDevitt corridor (county) | ~90,000 sq ft | Operating since the 1980s |
| Stevensburg campus | AWS via Marvell Developments LLC | Route 3, Stevensburg (county) | 2 buildings, ~427,000-445,000 sq ft, 243 ac | Building A operational 2025; Building 2 under construction[6] |
| CloudHQ CLP | CloudHQ | 14521 McDevitt Dr. (county) | Up to 2.1M sq ft, 3 buildings, ~142 MW | Site work underway[7] |
| DataBank | DataBank (ex-Red Ace site) | Germanna Hwy at the CTZ (county) | 1.4M sq ft, 85 ac, 192 MW | Under construction; first building due 2026-27[8] |
| Culpeper Technology Campus | Peterson Companies, now STACK | McDevitt Dr./E. Chandler St. (straddles town/county line) | 9 buildings, ~2.05M sq ft, 150 ac, 600 MW substation capacity | Approved 2023; site plans in review[9] |
| Copper Ridge | CR1/CR2 Culpeper LLC, now STACK | E. Chandler St. (town), beside Culpeper National Cemetery | Up to 8 buildings, ~2.36M sq ft, 116 ac | Approved 2023; site plans in review[10] |
| EdgeCore (ex-Cielo) | EdgeCore | Nalles Mill Rd. at U.S. 29 (county) | 1.4M sq ft initial, 216 MW initial / 432 MW future | Approved 2023; first power expected 2028[11] |
| Red Ace / Keyser Farm | Red Ace Capital | Nalles Mill/Keyser Rd. (county) | ~1.16M sq ft (four buildings of 290,000 sq ft per Baxtel; DCD reports two) | Approved July 2024[12] |

The Virginia Mercury counted “eight newly approved data center campuses” in April 2026; PEC’s materials say “over 10 million square feet” approved, while an August 2024 Culpeper Times survey counted “over 13 million square-feet of built or approved” space on nearly 1,000 acres across county and town. The discrepancy is

unresolved in the public record and the master figure would have to be rebuilt from the case files.[13]

# PART TWO: THE INSTRUMENT

## Five Zones Become One

The county's tool was not a zoning district but an incentive overlay. Virginia law lets localities create technology zones offering tax rebates and fee waivers; Culpeper County at one point had five, scattered across the county, the Brandy Station zone dating to 2006. The legacy terms were generous: up to 80 percent of county real estate, business personal property, and machinery-and-tools taxes rebated for five years, plus waived permit and site-plan fees.[14] In 2021 the county's economic development office began consolidating the five into a single Culpeper Technology Zone, a process that ran at least into January 2023, when the Brandy Station zone was eliminated outright (Part Three). Data Center Frontier gave the zone in June 2024 as 690 acres, just over one square mile; the county's economic development page, with a zone map dated July 2026, describes a 950-acre zone encompassing eight campuses. It lies along McDevitt Drive between Route 3 and U.S. 29, wrapped around the existing Equinix and SWIFT facilities and the town's wastewater treatment plant.[2]

The consolidated zone's published terms as of the snapshot: a 40 percent rebate of taxes paid for five years, triggered by $10 million of investment and ten hires at prevailing wage, plus a height allowance of up to 75 feet.[15] The height bonus mattered more than the rebate, in the economic development office's own telling. So did the third feature, the one that produced the quiet: inside the zone, data centers were a by-right use. On zone land already zoned for industry, a data center needed no hearing and no vote; land that still needed rezoning went to a vote, as Part Three records.

Trade press understood the design immediately. Data Center Frontier's June 2024 profile ran under a headline that said the zone "encourages data center development, heads off NIMBY"; the county's economic development director advised peer counties to "tell them where you want them to go. Put them in your planning documents, incentivize that area."[16] A DC Byte analyst made the same observation from the demand side: "The Culpeper Tech Zone was created to avoid a lot of the backlash much of Virginia has seen by localizing builds to a specified area."[5]

The instrument placement matters for the series' institutional spectrum. Henrico priced data centers with a discounted equipment rate and let by-right industrial zoning carry the volume. Hanover ran case-by-case rezonings and watched proffers reprice under resistance. Louisa and Goochland built technology overlay districts and drew litigation. Culpeper County did something narrower than any of them: it drew a box of about one square mile, by the 2024 trade-press account, around its

existing data infrastructure, made the box by-right, and kept the rest of the county discretionary. The approvals record in Part Three shows both halves of the design working: frictionless accumulation inside the box, contested votes and failed projects outside it.

## What the Box Did Not Cover

The structure had a precondition most counties lack. The box was drawable because the corridor was already industrial in fact: a federal communications bunker, a payments cooperative's operations center, a hyperscale-adjacent colocation campus, a wastewater plant, a rail line. Nobody's viewshed changed when CloudHQ bought 100 acres next to the sewage plant. Two of the three largest campuses, Copper Ridge and the Culpeper Technology Campus, though, sit partly or wholly outside the county's box, inside the town, and the AWS campus sits eight miles east of it on a horse farm next to a Civil War encampment ridge. Those three are where Culpeper's politics happened.

# PART THREE: THE APPROVALS

## Stevensburg, 2022: The Exception That Dates the Rule

The contemporary buildout opened with the county's most contested vote. In January 2022 Marvell Developments LLC, an AWS subsidiary, filed to rezone the Magnolia Equestrian Center, roughly 243 acres of agricultural land on Route 3 at Stevensburg, for two data center buildings totaling approximately 427,000 square feet, a reported $500 million investment.[6] The site abuts Salubria, an eighteenth-century manor on the National Register, and Hansbrough's Ridge, which the American Battlefield Trust describes as the largest concentration of untouched Civil War encampment features in the country. Nine organizations opposed the rezoning: the Battlefield Trust, PEC, the Journey Through Hallowed Ground, the Germanna Foundation, Friends of Cedar Mountain Battlefield, the Brandy Station Foundation, and others. Nearly a hundred people walked the property on a protest history tour before the vote.[17]

On Wednesday, March 9, 2022, the county Planning Commission recommended denial, 5-4. On Tuesday, April 5, 2022, the Board of Supervisors approved the rezoning 4-3 after roughly two hours of mostly opposed public comment: Deal, Bates, Underwood, and Durr in favor; Rosenberger, Gugino, and Campbell against.[18] In May, six adjoining landowners sued the board in Culpeper County Circuit Court, alleging illegal spot zoning contrary to the 2015 comprehensive plan. The suit failed to stop the project; its precise disposition is unreported, and the circuit court file is an open item in Part Eleven.[19] The proffers ran to berms and landscaping along Route 3, roughly 100 acres pledged to conservation easement, and private well and septic service; no cash proffer appears in any accessible account.[20]

Everything about the Stevensburg fight predicted a Prince William-style county. A 4-3 board, a battlefield coalition, a lawsuit, a contested transmission routing the following year. What followed instead was the zone.

## The Zone Fills, 2022-2024

CloudHQ bought its 100 acres on McDevitt Drive in September 2022 for $12 million, nearly twice assessed value, through SAAM Ventures LLC.[7] The campus needed no rezoning fight of its own; an adjacent 100-acre parcel at McDevitt and Frank Turnage Drive was rezoned from rural to light industrial by a unanimous board in mid-2023 on the application of PowerGrid Real Estate LLC, with a $50,000 proffer toward a traffic circle, and the Planning Commission's only recorded hesitation was traffic.[21]

Peterson Companies' Culpeper Technology Campus assembled roughly 150 acres at McDevitt and East Chandler Street, straddling the town line. The county Board of Supervisors approved the 35-acre county-side rezoning unanimously on Wednesday, July 5, 2023; the town had already rezoned the larger in-town portion. Peterson's announcement gives 115 acres "previously rezoned by the Town of Culpeper for light industrial"; Star-Exponent coverage describes a council-initiated industrial rezoning of six parcels totaling more than 230 acres, including the former Ridgepointe housing site.[9] Marketing materials touted two approved 300-megawatt Dominion substations. Peterson sold the shovel-ready campus in January 2025 for a reported $302 million, and STACK Infrastructure now controls it.[22]

Cielo Digital Infrastructure's 121 acres at Nalles Mill Road and U.S. 29 drew the only proffer package in the county record assembled for this report with line items worth comparing: a square-footage-based donation to Culpeper County Volunteer Fire & Rescue exceeding $500,000, $12,500 each to county 4-H and FFA, $25,000 each to Germanna Community College and the Culpeper Technical Education Center, a $300,000 road-improvement escrow, and 60/70 dBA noise limits. The board approved it 5-2 on Tuesday, December 5, 2023, with one supervisor urging the county to "embrace the limited market."[11] EdgeCore acquired the project in July 2024 and scaled the announcement to series-familiar numbers: three buildings at 72 megawatts each, 216 megawatts of initial critical load, expandable to 432, with first power expected in early 2028 through Rappahannock Electric Cooperative.[23]

DataBank announced its 85-acre acquisition in late 2023 and built on an entitlement that predates the window: the underlying Red Ace application was approved in 2019, so DataBank's 192-megawatt campus proceeded as site plans inside the zone, no hearing required.[8] A second Red Ace project, the 69-acre Keyser Farm campus, needed a discretionary vote and barely got it: tabled 6-1 on Tuesday, June 4, 2024, then approved 4-3 on Tuesday, July 2, 2024, with projections of $14-19 million a year in equipment tax.[12]

The pattern across the zone years is the design working as drawn. Five campuses, about 8.1 million square feet on the Part One table, accumulated this way: two with no vote of their own, and three through rezoning votes, unanimous for Peterson's county side, 5-2 for Cielo and 4-3 for Keyser Farm (at the zone's edge, in 2024 when the climate had already turned), with no organized opposition campaign in the sources read for this report. The town's two campuses are the partial exception, and they belong to Part Four.

## Outside the Box: Brandy Station, Twice

The same county killed two projects three miles north. In 2022 David Martin's AttoTek proposed three data centers on 88 acres of his Brandy Station technology-

zone land; the Planning Commission unanimously recommended denial, the application was withdrawn, and on Tuesday, January 3, 2023, the Board of Supervisors eliminated the Brandy Station Technology Zone outright, stripping the incentives from his 351.77-acre parcel.[24] Martin returned in 2024 as Culpeper Acquisitions LLC with XX Tech Park: 425.96 acres rezoned to light industrial for 4.6 million square feet in nine multi-story buildings, billed as a $12 billion project, case Z-463-24-1. PEC estimated the load at 700 megawatts to 1.8 gigawatts against a then-county total of roughly 240 megawatts. The state had just assembled the Culpeper Battlefields State Park less than a mile away, dedicated June 8, 2024. The Planning Commission recommended denial unanimously on Wednesday, June 12, 2024, and the application was withdrawn before a board vote.[25]

Brandy Station is the control experiment inside the control case. Same county, same years, same industry, same board. Inside the McDevitt box: by-right accumulation. Outside it, on battlefield-adjacent farmland: unanimous denials and a technology zone repealed. The county was never permissive or restrictive; it was geographic.

# PART FOUR: TWO CULPEPERS

## The 2012 Settlement That Pre-Fought the War

The town-county utility war that Orange County is fighting in 2026 happened in Culpeper a generation ago, and it ended in a contract. After roughly twenty years of disputes over utility extensions and annexation, a three-judge panel entered a final order on March 28, 2012, approving a Voluntary Settlement Agreement between the town and county. Its terms: the county designates a water-and-sewer service area in its comprehensive plan; the town must serve that area at the same rates as in-town customers (county customers had previously paid 50 to 100 percent more); the town's service obligation in the area is capped at 1.5 million gallons per day over thirty years; the town may make boundary adjustments once a decade and agreed not to seek city status for thirty years.[26]

That agreement is why the data center wave produced no annexation fight and no water-extension standoff. The McDevitt corridor sits in the designated service area; the town serves it at in-town rates because a 2012 court order says so. The 1.5 MGD cap is now the single most important unexamined number in the county: the town's water system has a safe yield of about 4.0 million gallons per day from Lake Pelham and Mountain Run Lake, its treatment plant matches that, and its wastewater plant was rated around 6.0 MGD in the county's 2015 comprehensive plan. No public document tallies committed data center flows against the cap.[27]

## The Town's Three Utilities

The Town of Culpeper is one of Virginia's few municipal electric localities. Its electric plant, built in 1933, was Virginia's first municipal electric facility funded with federal Public Works Administration financing, in the words of the state's historic register listing; the Light and Power Department today serves roughly 5,900 meters and buys wholesale from Dominion and the Southeastern Power Administration through the Virginia Municipal Electric Association.[28] By default, the two campuses inside town limits would have been the town utility's customers, a load that would have dwarfed the system serving them.

The town declined. At a special called meeting on Tuesday, October 28, 2025, the town council unanimously approved an electric service premise agreement letting Dominion serve the Culpeper Technology Campus and Copper Ridge, releasing the municipal utility's obligation. The town manager's explanation deserves quoting because it is the most candid utility-risk statement in the series: serving the campuses "would make it such that we almost had only one customer… It could have significant impacts if something went awry."[29]

The same meeting produced the instrument the rest of the series should be measured against. The council approved a minimum revenue agreement with STACK guaranteeing the town at least $1.5 million per building per year for fifteen years from first occupancy, the developer paying any shortfall against tangible personal property collections. InsideNoVa reported thirteen data centers planned across the two campuses, which makes the floor $19.5 million a year (the Part One table, from developer and press filings, carries nine buildings on the Technology Campus and up to eight at Copper Ridge; the reports read do not reconcile the two counts), potentially around $300 million over the term with the cost escalator. The structure answers a specific failure mode: in Manassas, tax-exempt tenants hollowed out a municipality's projected equipment revenue. A council member's motion to raise the floor to $3 million per building died without a second; the same member objected to taking it up at a special called meeting rather than a regular one, and said that to rush it through "with no public comment" made the optics bad.[29] The meeting fell seven days before the November 4, 2025 local election.

Two more agreements complete the town's ledger. STACK is funding, at 100 percent plus a 5 percent town overhead of roughly $1.5 million, a reclaimed-water system: a two-million-gallon, 200-foot tank beside the town wastewater plant supplying treated effluent for cooling at the Culpeper Technology Campus, projected to cut the town's discharge into the impaired Mountain Run by 30 percent. The estimate was $10-11 million in 2024; by April 2026 it was $30.1 million, all of it the developer's.[30] STACK is also funding a new water tower secured through proffer amendments.[31]

## The Town's Politics

The town's approvals were not quiet; they were absorbed. The Copper Ridge rezoning, 116 acres from residential to industrial beside the Culpeper National Cemetery, split the town planning commission 2-2, drew 42 opposition letters and a ten-to-one ratio of opposing speakers, with veterans testifying to the cemetery's sanctity, and passed the town council on Tuesday, September 12, 2023, with six in favor, one abstention, and one absence by one account (another gives 7-0 with an abstention).[10] The substation fight the following summer ran the same shape: the town planning commission found the Copper Ridge substation out of conformance with the comprehensive plan, and the council overruled it 6-2 in July 2024.[32] In March 2025 the council voted 6-2-1 to replace the noise standard STACK had accepted at rezoning, a 1960s frequency-band rule, with an A-weighted standard residents argued permits roughly 50 percent more noise.[33]

Then the town closed its own door. The Unified Development Ordinance adopted Tuesday, October 14, 2025, includes a data center overlay that effectively prohibits

new data centers in town.[34] Two weeks before the council secured the revenue floor, the town's posture inverted from recruitment to fortification: the campuses already approved would be monetized hard, and there would be no more. The 2025 mayoral race tested the arrangement. Councilman Jon Russell, the council's most consistent data center opponent, challenged incumbent Mayor Frank Reaves Jr. on an explicitly anti-data-center platform and lost, 54 to 45 percent. The coalition-aligned council candidate lost too.[35]

In 2026 the residue is procedural. STACK's site plans have been repeatedly rejected, one in late 2025 for placing generator bays facing the Madison Station townhomes; the town proposed an ordinance allowing early clearing-and-grading permits before site plan approval, which PEC organized against in April; FOIA'd emails obtained by a Coalition to Save Culpeper member showed coordination between town planners and developers that the town planning commission's own chairman called "unprecedented access."[36]

# PART FIVE: THE TIGHTENING

## The County Ends By-Right

On Tuesday, September 2, 2025, the Board of Supervisors voted unanimously to require a conditional use permit for data centers on all light- and heavy-industrial land in the county, roughly 2,200 acres across 140 light-industrial parcels plus 867 heavy-industrial acres, exempting the technology zone, where five approved projects were deemed vested.[37] The proximate cause was developers probing industrial parcels near Eastern View High School. The structure of the amendment restates the original design: the box stays by-right, everything else becomes discretionary. PEC campaigned for the change and claimed it as a win. The board has also signaled it will revisit the zone's 40 percent rebate.[38]

The sequence deserves placement on the series' shelf. Henrico tightened after its largest entitlements were banked. Orange removed by-right after Wilderness Crossing. Culpeper County ended by-right use outside the zone after five approved projects in the zone were deemed vested, and its tightening exempted the very geography where the inventory sits. Reform-after-accumulation is now the dominant pattern in the portfolio, and Culpeper is its cleanest specimen because the county wrote the exemption into the reform itself.

## The Election

Two months later the county's voters replaced three of seven supervisors. In Stevensburg, the district that absorbed the AWS campus, a farmer named DeWayne Payne unseated incumbent Susan Gugino with about 62 percent; Gugino had voted against the Amazon rezoning in 2022 but for Keyser Farm in 2024, and her call, reported in February 2025, for conditional use permits on all new data centers did not save her. Board chairman David Durr, a yes on both Amazon and Keyser Farm, lost Cedar Mountain to Mandy Jenkins Brown. In Jefferson, Keith Farrish unseated the incumbent Brad Rosenberger, a consistent no vote. The three newcomers joined a vote to fire the county administrator in early 2026.[39] The results read as a growth-politics realignment entangled with partisan currents rather than a single-issue verdict; the report flags rather than resolves the attribution, noting only that the supervisor who lost worst represented the district that hosts the county's most visible campus.

## The Grid Arrives as Politics

The fight the approvals deferred surfaced in 2026 as transmission. Dominion told the board as early as September 2023 that data centers were driving 214 percent growth in area power demand.[40] The county's own buildout required a substation

and line program documented in Part Six. The breaking point was none of those; it was the regional project. PJM selected Valley Link Transmission, a joint venture whose partners include Dominion and FirstEnergy, to build a 765-kilovolt line from Joshua Falls to a new Yeat substation, 156 miles as PJM originally approved it, over $1 billion. A scope change then pending before PJM would move Yeat from Fauquier County to a site at Richardsville in Culpeper (PEC describes an 88-acre substation; the Culpeper Times report of the board's May 19, 2026 meeting describes a 448-acre property with about 127 acres planned for development), from which further 500-kilovolt lines would fan out, and shorten the line to 115 miles; PJM's Board approved the change in July 2026.[41]

The Board of Supervisors adopted a resolution opposing the line and the substation 6-1 on Tuesday, April 7, 2026, and on Tuesday, June 2, 2026, voted to send PJM a coalition-drafted letter asking it to reject or delay the relocation. The hearing record supplied the quotations that close the loop on the county's decade: a Richardsville resident asking not to be "the sacrificial lamb... so we can have more data centers ruining our landscape," the board chairman estimating constituent opposition at "at least 200 to 1," and a supervisor answering Dominion's diffusion framing directly: "If Northern Virginia needs all this power, tell them to put a power source up there."[42] A county that spent 2021-2024 absorbing Northern Virginia's overflow load now demands the load stay north. The energy geography reading in Part Ten takes up the symmetry.

PJM's staff white paper to the Board describes the approved change as moving the Yeat substation roughly fifteen miles south of its original location and shortening the Joshua Falls-Yeat line to 115 miles from the original 156, with a stated cost decrease of $259.84 million, and records that PJM "received correspondence both supporting and opposing the recommended scope change." The white paper names neither Culpeper nor Richardsville. The Culpeper link is in PJM's reply to correspondents, a letter from its President and CEO dated July 16, 2026: "Valley Link found that the Culpeper substation location outperformed the original substation alternative across impact, constructability and system efficiency, all while meeting PJM reliability requirements." PJM's approval changes the scope of a project PJM had already approved; it is not a State Corporation Commission certificate or a county land-use approval.[41]

# PART SIX: POWER

## Three Providers, One County

Culpeper's electric service is split three ways: Dominion handles all transmission and part of distribution; Rappahannock Electric Cooperative serves much of the rural county and part of the technology zone; the town's municipal utility serves in-town customers. The split runs through the campus list. AWS Stevensburg is Dominion's, via a dedicated line and substation. DataBank's campus runs on a 300-megawatt Dominion substation. The STACK campuses are Dominion's by premise agreement. EdgeCore's is the cooperative's, with first power in 2028.[43] Developers in the zone enjoy what the trade press calls optionality; in this series it is regulatory arbitrage, found elsewhere in the portfolio only in Mecklenburg.

## The Dominion Buildout, in Case Numbers

Three certificate cases mark the county's transmission decade. PUR-2022-00198, filed November 2022 and approved in December 2023, authorizes rebuilding a 115-kilovolt line at 230 kilovolts from Stevensburg into the zone and two new substations, Cirrus and Keyser, beside the existing Mountain Run substation; Dominion's project page, read August 18, 2026, schedules substation construction from May 2026, the line rebuild from early 2027 and in-service for late 2027.[44] PUR-2023-00206, filed November 2023 and approved August 7, 2024, covers the Germanna project: a 1.8-mile 230-kilovolt line and a six-acre substation, $54.3 million, constructed solely to serve the Amazon campus, with construction slipping to an April 2026 start. A local commentary argued the cost flows into rates paid across Dominion's zone, including the cooperative's and the town's wholesale purchases; the formal cost-allocation treatment in the order is an open item in Part Eleven.[45] PUR-2025-00032, filed February 2025 and approved March 12, 2026, is the big one: four new substations inside the zone (Mt. Pony, McDevitt, Chandler, Palomino), a 230-kilovolt loop through town and county, line conversions reaching into Orange and Fauquier, and the Oak Green substation relocated, supporting roughly 1.8 gigawatts of new delivery by PEC's estimate. The Board of Supervisors unanimously supported the application in January 2025.[46] Eight new or relocated substations certificated between December 2023 and March 2026, before counting Yeat.

## The Cooperative's Problem

The series' utility finance work has been Dominion-shaped; Culpeper forces the cooperative machine into view. Rappahannock Electric Cooperative's system peak is roughly 1,150 megawatts across 183,000 accounts. It has received on the order of 20,000 megawatts of inbound data center requests and projects roughly 17

gigawatts of data center load in its territory by 2040. Its all-requirements wholesale supplier, Old Dominion Electric Cooperative, declined: in 2024 ODEC's board passed resolutions refusing to supply thirteen prospective exceptionally sized customers in REC territory.[47]

REC's answer was structural. It created Hyperscale Energy Services LLC, a wholly owned subsidiary whose project entities buy PJM market power for individual data center customers and pass costs through, outside the cooperative's regulated rates; a Virginia Code amendment effective July 1, 2025, authorizes exactly this for loads of 90 megawatts or more. In parallel, REC filed a large-load tariff at the SCC (PUR-2025-00048, filed March 12, 2025 and approved, subject to the Commission's determinations, on March 20, 2026): customers over 25 megawatts siloed in their own class, collateral requirements, and delivery charges based on dedicated substation transformer nameplate rather than metered demand.[48] EdgeCore's 216 megawatts will arrive through this machinery. The arrangement is the cooperative sector's answer to the question Hanover's record poses about Dominion: who holds the risk when the load is bigger than the utility. REC's answer is to wall the load off from its members entirely; the open comparison is whether Mecklenburg Electric and ODEC reached the same design a decade earlier or something worse.

# PART SEVEN: THE FISCAL RECORD

## The Equipment Rate

Culpeper County taxes data center computer equipment at $3.50 per $100 of assessed value, the same nominal rate as general business personal property, on an accelerated depreciation schedule. Neither the county's economic development tax page nor the Treasurer's rate page lists a discounted data center class. The figure belongs beside the series' board: Henrico held $0.40 for years and built volume, then raised the rate to $2.60 in 2025; Hanover kept $0.45 for calendar year 2026 on June 24, 2026 and referred the rate to committee; Prince William raised its rate to $4.50 in April 2026, and Loudoun's stands at $4.15. Culpeper's $3.50 sits below both.[49] Inside town limits the town adds $1.00, making the combined equipment levy roughly $4.50. The structural consequence: equipment, not buildings, carries every projection in the county record, at a rate about 7.8 times the county's 2026 real estate rate.

The incentive runs the other way and is shallower than it looks. The zone's 40 percent rebate lasts five years per qualifying investment; the county's February 2026 economic development study projects $667 million in zone incentives against $1.79 billion gross zone revenue by 2041, with $57 million shared to the town and a county net of $1.35 billion.[50] Those are projections commissioned by the government that granted the incentives, and the series treats them like EY's Hanover numbers: disclosed-parameter advocacy math pending an actual.

## The Anticipatory Ledger

Culpeper's record does not yield the series' second actual revenue record. It holds projections and rate increases. The operating base before the boom was Equinix and SWIFT, never broken out in county documents. The AWS campus's first building reached operation in 2025, too late to put meaningful equipment on a January 1 assessment roll before tax year 2026 at the earliest. The supervisors said so themselves while raising taxes: adopting the 43-cent real estate rate in spring 2025, one supervisor noted "we will need some data center revenue to show up in the next few years"; the vice chairman placed the zone's buildout revenue at 2028.[51]

The county real estate rate tells the story projections obscure:

| Tax year | Rate per $100 | Context |
|---|---|---|
| 2020 | $0.62 | Pre-boom baseline |
| 2021 | $0.55 | Equalized after reassessment |
| 2022 | $0.55 | Held; AWS approved this year |
| 2023 | $0.46 | Equalized ($0.44) plus 2 cents |
| 2024 | $0.47 | +1 cent, worth $824,539 |
| 2025 | $0.43 | Values up 17.22%; equalized ($0.41) plus 2 cents, adopted 6-1 |
| 2026 | $0.45 | County Treasurer’s list ($0.37 base plus $0.08 Fire and Rescue levy, the same structure as prior years) |

Three consecutive increases over the equalized rate from 2023 to 2025, and two cents more in 2026 on the Treasurer’s list, driven by school construction debt ($5.5 million interest-only in FY26, $7.2 million first full payment in FY27), with future data center revenue cast as the eventual offset.[52] One penny of real estate tax equals about $969,560. Against this stands the industry counterfactual: the 2026 NVTC report calculates that, to offset the loss of data center tax revenue in 2024, Culpeper would have needed to raise its real property tax rate from $0.430 to $0.577 per $100. NVTC’s $0.430 is the table’s 2025 rate; the table gives 2024 as $0.47. The 14.7-cent gap implies a contribution near $14 million a year at the 2025 penny value of $969,560, or about $12 million at the 2024 value of $824,539. That number cannot be reconciled with the supervisors’ own statements that the revenue has not arrived; it likely sweeps in construction-period taxes, land assessments, town-side collections, and the legacy facilities. The report presents the contradiction unresolved, which is itself the finding: in year four of the buildout, the county cannot say, or has not said, what data centers actually pay it.[53]

The projections on the record, for the eventual audit: the AWS campus at $5-8 million a year (applicant’s attorney) or roughly $23 million of equipment tax over five years (county EDA, assuming $330 million of the $500 million investment is equipment); Keyser Farm at $14-19 million a year; the vice chairman’s “eventually” estimate of $100 million in annual technology revenue; the town’s guaranteed floor of $19.5 million.[54] These are Culpeper’s entries for the projection tests that the Mecklenburg case study (v1.0, June 2026) sets for the series.

## Proffers Against the Series Board

| Jurisdiction (case) | Buffer/siting | Noise | Water | Cash and other |
|---|---|---|---|---|
| Culpeper Co. (AWS, 2022) | Berms/landscaping on Rte 3 | None found | Private well/septic | ~100 ac conservation easement; no cash found* |
| Culpeper Co. (Cielo, 2023) | — | 60/70 dBA | — | >$500K fire-rescue (per-sq-ft), $75K education/youth, $300K road escrow |
| Town of Culpeper (Copper Ridge, 2023) | — | Town ordinance (since amended) | — | $0.23/sq ft fire & rescue, $100K scholarships, $100K trails/trees |
| Hanover (Mtn Road, Mar. 2026) | 300 ft | 57/52 dBA | No single-pass | $90K cash (final pkg ~$21M) |
| Chesterfield (Tract) | 725 ft | 75/65 dB | 2,000 GPD/acre | Conditional use required |
| Prince William (Tier 3) | 1,320 ft | DEQ Tier 4 | Runoff testing | Decommissioning escrow; $0.66/sq ft fire-rescue |
| Loudoun (post-2025) | 500 ft | Phase 2 pending | Phase 2 pending | SPEX required |

The Culpeper rows are thin because most of the inventory never passed through a proffer negotiation at all; by-right projects proffer nothing. Where the county did negotiate, its terms were early-Hanover grade. PEC's Culpeper field representative made the comparison on the record at the Copper Ridge hearing: Prince William collects $0.66 per square foot for fire and rescue against the town's $0.23.[55] The town's real extraction came later and through different instruments: the revenue floor, the $30.1 million reclaimed-water system, the water tower. Terms did not buy the quiet in 2022-23; the quiet's end priced the terms of 2025.

## Land

The corridor repriced in plain sight. The McDevitt parcel that sold for $6.5 million in 2018 (about $65,000 an acre) went to CloudHQ in 2022 for $12 million (about $120,000 an acre, nearly twice assessed value). Cielo paid $18.75 million for 121 acres in May 2023, about $155,000 an acre. Peterson's assembled, entitled, substation-served campus sold for a reported $302 million in January 2025, which against roughly 150 acres is on the order of $2 million an acre for shovel-ready

ground.[56] Entitlement, not land, is the asset; the county that granted the entitlements for free watched a private seller capture the spread. The AWS land price was never disclosed. Parcel-level assessment histories along Route 3 and McDevitt have not been assembled for this report.

# PART EIGHT: THE WATCHDOGS AND THE STATE

## The Opposition That Did Exist

The state's lead data center watchdog sits next door to the quiet county rather than inside it, and the irony survives the geography. The Piedmont Environmental Council is headquartered in Warrenton, one county north, and maintains a dedicated Culpeper land-use field representative who appears in nearly every contested record in this report: testimony at the Stevensburg, Brandy Station, and Copper Ridge hearings, the noise-standard fight, comments on every transmission docket, a Culpeper policy brief, and the campaign for the 2025 county ordinance.[57] The organization that wrote Virginia's data center opposition playbook spent the boom years one county away, fully engaged, and the county still assembled gigawatts. That is evidence about the limits of advocacy against by-right siting.

The county produced its own group late. The Coalition to Save Culpeper formed in 2024, town-centered, born from the Copper Ridge and Technology Campus fights rather than the county approvals; its record runs to FOIA campaigns, noise-standard demands (55 dBA daytime, 40 at night, third-party monitoring, a cure-or-shutdown rule), an unsuccessful council candidacy, and the public challenge to the October 2025 revenue agreement's process.[58] The battlefield organizations won their ground outright: every project they fought at Brandy Station died, and the state park their advocacy assembled now functions as a siting constraint with a dedication date.

What Culpeper had not produced by June 12, 2026, on the record assembled for this report: a countywide citizens' coalition during the accumulation years, a moratorium proposal, an FOIA lawsuit, a zoning appeal, or any litigation beyond the 2022 spot-zoning suit. The negative findings are as load-bearing as the positive ones.

## The State Closes In

The statewide apparatus that now frames every Virginia report reached Culpeper intact as of the snapshot. The 2026 General Assembly adjourned without a budget over the data center sales-tax exemption, worth $928.6 million in sales tax savings to data centers and their tenants in FY2023 by JLARC's accounting and about $1.6 billion annually by the Senate Finance chair's; the April special session failed; the impasse stood unresolved against the July 1 deadline as of June 12, with the governor signaling a deal.[59] The budget was approved by the Governor on June 29, 2026 (Chapter 1, 2026 Acts of Assembly, Special Session I, effective July 1, 2026). It kept the sales and use tax exemption, as the Virginia Mercury reported on June 30, 2026, and in Item 3-5.24 created an electricity consumption tax on data center operators of $0.011 per kilowatt-hour consumed at each data center, levied from July 1, 2026 until July 1, 2028 and collected monthly by the SCC. No more than $600 million of

the tax’s revenue in a fiscal year goes to the general fund; revenue above that, less the SCC’s administrative costs, goes to a nonreverting fund and is refunded pro rata.[59] HB 507, signed April 8, 2026, requires DEQ to deny air permits for non-Tier IV data center generators on applications submitted on or after July 1, 2026. SB 553’s water-reporting regime was enacted as Chapter 896, approved April 13, 2026 and effective January 1, 2027.[60] For Culpeper specifically the exemption fight cuts at the fill-rate: the county’s entire fiscal case rests on equipment purchases that the exemption subsidizes, and a repeal would slow the very revenue the board has spent three tax years anticipating. The town’s floor is insulated by design; the county’s projections are not.

## PART NINE: THE QUESTION ANSWERED

The question is why one of the largest entitlement accumulations in the diffusion ring produced so little visible politics. Five explanations are tested against the record.

**Structure survives best.** The by-right zone removed the procedural surface on which data center politics happens everywhere else in the series. No rezoning means no hearing, no speaker count, no 4-3 vote, no lawsuit target. On the Part One table, the two zone campuses that went to no rezoning vote of their own, CloudHQ and DataBank (note [21] leaves open whether the adjacent PowerGrid rezoning covers CloudHQ ground), hold about 3.5 million of roughly 11.2 million square feet, about a third; the zone's three rezoned campuses passed their votes without an organized campaign in the sources read for this report. The two-government layout reinforced the effect: the 2012 settlement pre-resolved the utility-extension war, and the town, holding its own veto points, chose extraction over resistance and then closed its door. Where the design required discretion, at Stevensburg, Brandy Station, Keyser Farm, and the town rezonings, Culpeper's politics look like a compressed Prince William: narrow votes, organized coalitions, a lawsuit, withdrawn applications.

**Siting survives as the design's precondition.** The box worked because it was drawn around forty years of existing secure infrastructure, a wastewater plant, and a rail corridor. It fails as a freestanding explanation: the AWS campus, the county's first and most visible approval, sits on greenfield equestrian land beside a battlefield ridge, and it drew exactly the conflict the siting explanation predicts.

**Sequencing survives partially.** The discretionary approvals cleared in 2022-23, before the statewide backlash matured. The same board facing the same instrument in 2024 produced a unanimous denial recommendation at Brandy Station and a 4-3 squeaker at Keyser Farm; by 2025 it ended by-right use outside the zone. The window mattered. But sequencing cannot explain the zone, which would have been quiet in any year.

**Terms fail.** The county's proffers were thin to nonexistent during the accumulation; the strong terms (the revenue floor, the reclaimed-water system) arrived in 2025, after the politics had already turned, and they were the town's, not the county's. Nothing in the record suggests the quiet was bought. The buying came later, and it bought closure, not consent.

**Latency is half-confirmed and mislocated.** The fights came, but not as a delayed Loudoun. They surfaced displaced: at the zone's edges (Brandy Station, the high school parcels), in the town's site-plan trench warfare, in a board election, and above all in transmission, where the county now formally opposes the regional buildout its

own load helped justify. The 2026 conflict map is infrastructure and procedure, not entitlement. A county that closed the front door is fighting at the substations.

The null case, then, is not null. Culpeper had the same conflict endowment as every county in the series: battlefields, a national cemetery, rural corridors, a watchdog next door. Its institutions routed the buildout around the conflict surface for four years. The quiet was real while it lasted, manufactured rather than organic, and it ended on schedule: when the box filled, when the bills for power infrastructure came due, and when the first government (the town) had extracted enough to stop.

# PART TEN: READINGS BY RESEARCH SPECIALTY

## The Institutional Behavior Reading

Culpeper is the series' cleanest demonstration that the visibility of data center politics is an institutional variable, not a measure of sentiment. The county did not have less opposition than Hanover; it had fewer occasions for opposition to attach to. This report documents the full instrument inventory: the incentive-overlay technology zone (not a zoning district), by-right use inside it, case-by-case rezoning outside it, the 2023 repeal of a satellite zone as a denial-by-other-means, the 2025 conditional-use amendment with its vested-projects exemption, the town's UDO prohibition overlay, and the premise and minimum-revenue agreements as governance instruments no other jurisdiction in the portfolio has used. The reform-after-accumulation sequence repeats Henrico and Orange with one refinement: Culpeper's reform formally exempts the accumulation. Two capacity-and-conduct threads run beside it: the county administrator's firing after the 2025 election (Part Five) and the FOIA-documented developer access inside town planning (Part Four).

## The Utility Finance Reading

Three machines, one county. Dominion's: $54.3 million of customer-funded transmission approved solely for one Amazon campus, plus a four-substation loop approved March 2026, with cost allocation across the rate base as the live question and the orders in PUR-2022-00198, PUR-2023-00206, and PUR-2025-00032 as open items in Part Eleven. The cooperative's: ODEC's refusal to supply, and REC's Hyperscale Energy subsidiary as the sector's risk-walling answer, with the PUR-2025-00048 tariff as the document of record. The municipal utility's: the only government in the series that owned the wire and declined the load, trading service obligation for a guaranteed floor. The fiscal half of the reading gets the anticipatory ledger: a $3.50 rate with no discounted data center class on the county's 2026 rate pages, real-estate increases in each year from 2023 to 2026 pending revenue that has not arrived, the NVTC counterfactual that cannot be squared with the supervisors' own statements, and a projection set ($5-8M, $14-19M, $100M "eventually") waiting for the Mecklenburg-style audit this county cannot yet support.

## The Distributional Justice Reading

The corridors that absorbed the buildout were chosen because absorbing was already their function: the McDevitt corridor's neighbors are a wastewater plant, a rail line, and the county's own industrial history. The distributional questions live at the edges. Stevensburg, a rural crossroads community, took a 243-acre campus, a dedicated transmission line, and a substation over its neighbors' lawsuit; who lives along Route 3 and Batna Road, and what the berms actually screen, are not

established in the record assembled for this report. Madison Station's townhomes face generator bays in rejected site plans. Richardsville, population measured in hundreds, faces a substation hub so that, in its residents' words to the board, the county can have more data centers. And the National Cemetery question from the Copper Ridge record (what is owed to the dead and those who visit them) is distributional in a register that is more than heritage aesthetics. Water equity runs through the 1.5 MGD settlement cap: the town's obligation to county growth is finite, and nobody has published the running total.

## The Energy, Labor, and Infrastructure Reading

The labor record is thin and the thinness is the finding: roughly 90 permanent jobs at the AWS campus against 365 construction workers at peak, around 40 operational jobs per DataBank campus against 350-770 in construction, and the county's own rule of thumb of 30-40 per building. The zone's qualifying threshold is ten hires. The one distinctive feature is security clearance: AWS's Culpeper postings require Top Secret/SCI with polygraph, marking the campus as classified government workload and its jobs as a different labor market from the commercial fleet, drawing on a clearance-holding commute shed rather than local pipelines.[61] Construction sequencing across six simultaneous campuses, sheriff's deputies on paid details at site entrances, and a fire department that trained on a developer-donated structure round out the infrastructure-burden picture.

## The Energy Geography Reading

Culpeper is the diffusion thesis's mid-ring exemplar: close enough to inherit Loudoun's overflow through the "pathway community" mechanism, far enough to choose its receiving geometry. The choice produced a paradox. By concentrating the load in one zone, the county minimized its land-use footprint and maximized its grid footprint: 2,435 megawatts of delivery requests, eight substations certificated between December 2023 and March 2026, a 230-kilovolt loop, and now a 765-kilovolt interregional line terminating, if PJM's scope change holds, at Richardsville. The county's April 2026 opposition resolution, and its supervisor's instruction to "put a power source up there," is the diffusion ring discovering that electricity does not diffuse the way entitlements do: the load came south, and the wires must follow. Culpeper County now occupies both roles in the regional drama at once, beneficiary of the overflow and objector to its infrastructure, which makes it the bridge case to the series' Fredericksburg Ring and Thirteen Cooperatives volumes.

# PART ELEVEN: GAPS IN THE RECORD AND DIRECTIONS FOR FURTHER RESEARCH

Each item below is an open documentary question with an address. Items marked with an asterisk correspond to claims flagged with an asterisk in the endnotes, which rest on secondary sources or await primary verification.

## Decisions Pending at Snapshot

Valley Link's SCC certificate application, expected in September 2026 at the snapshot: as of October 10, 2026, a caption search of the 2026 cases the Virginia SCC docket index returned (through PUR-2026-00168, with five case numbers in that range not returned) found none naming Valley Link, Joshua Falls, or Yeat. The one Valley Link case the index held on October 7, 2026 was PUR-2025-00220, a December 2025 application for approval of affiliate agreements. The developer's project page, last modified October 1, 2026, still listed the SCC filing for the third quarter of 2026, and the Piedmont Environmental Council reported on September 29, 2026 that Dominion planned to file in November.[41] The town's early-grading ordinance O-2026-003. STACK's resubmitted site plans in town. The DARLO 300-megawatt substation conditional use permit (U-2251-25-1), heard March-April 2025, outcome unlocated. Whether the county revisits the zone's 40 percent rebate.

## Primary-Source Verification Priorities

The 2022 AWS rezoning case file: case number, the executed proffer statement, and the staff report (the proffer description here rests on press accounts*). The circuit court file on the 2022 landowners' suit: disposition, date, and grounds. Rezoning case numbers and proffer statements for the Peterson, PowerGrid, and Cielo approvals. The technology zone consolidation ordinance: adoption date, boundaries, and the 80-versus-40 percent rebate evolution. The September 12, 2023 Copper Ridge town council tally (one account renders it 6-0-1 with an absence, another 7-0 with an abstention; one source dates the vote September 5*). The October 28, 2025 premise and minimum-revenue agreements as executed documents. The PUR-2025-00032 final order's cost figure and allocation language. Whether the Dec. 23, 2023 date reported for the PUR-2022-00198 final order is correct (it falls on a Saturday*). The CloudHQ-PowerGrid parcel relationship. The "Red Ace XI" project's identity. Current town water demand and WWTP permitted capacity against the 4.0 MGD yield and the settlement's 1.5 MGD cap.

## Records and Their Addresses

County: actual data-center-attributable revenue by year from the Commissioner of the Revenue (BPP and computer-equipment levy lines, FY2023-FY2027); the EDA's

technology-revenue schedule requested by the board in March 2025; the February 2026 economic development study's methodology; technology zone rebate disbursements to date, by recipient; the accelerated depreciation schedule percentages. Town: the executed STACK agreements (premise, minimum revenue, reclaimed water, water tower); reclaimed-water rate study; utility availability letters for each county-side campus; cumulative committed flows against the VSA cap. Court: the 2022 suit's full file. SCC: the three Dominion orders.

# APPENDIX: TIMELINE OF TURNING POINTS, 2019-2026

| Date | Entity | Event |
|---|---|---|
| 1969 | — | Federal Reserve opens Mount Pony facility; the “Culpeper Switch” follows |
| 2007-08 | — | Terremark builds NAP of the Capital Region on McDevitt Dr. (later Verizon, then Equinix) |
| Mar. 28, 2012 | Town/County | Court-approved Voluntary Settlement Agreement: service area, equal rates, 1.5 MGD cap |
| 2019 | County | Red Ace application approved (later the DataBank site) |
| 2021 | County | Consolidation of five technology zones into the Culpeper Technology Zone begins (690 acres by a June 2024 trade-press account; 950 acres on the county’s page in 2026) |
| Mar. 9, 2022 | County PC | Recommends denial of AWS Stevensburg rezoning, 5-4 |
| Apr. 5, 2022 | County BOS | Approves AWS rezoning 4-3 |
| May 2022 | Circuit Court | Six landowners sue over the rezoning (spot zoning); suit ultimately fails* |
| Sept. 2022 | — | CloudHQ buys 100 ac on McDevitt for $12M |
| Oct. 2022 | County PC | Unanimous denial recommendation, Brandy Station Technology Park; withdrawn |
| Jan. 3, 2023 | County BOS | Eliminates Brandy Station Technology Zone, unanimous |
| Jul. 5, 2023 | County BOS | Approves Peterson/Culpeper Technology Campus county-side rezoning, unanimous |
| Mid-2023 | County BOS | Approves PowerGrid 100-ac McDevitt rezoning, unanimous; $50K proffer |
| Sept. 12, 2023* | Town Council | Approves Copper Ridge rezoning beside the National Cemetery (6-0-1, one absent) |
| Dec. 5, 2023 | County BOS | Approves Cielo rezoning 5-2 |
| Dec. 2023 | SCC | Approves Cirrus-Keyser 230 kV rebuild and substations (PUR-2022-00198) |
| Jun. 8, 2024 | — | Culpeper Battlefields State Park dedicated |
| Jun. 12, 2024 | County PC | Unanimous denial recommendation, XX Tech Park (Z-463-24-1); withdrawn |
| Jul. 2, 2024 | County BOS | Approves Red Ace/Keyser Farm 4-3 |

| Date | Entity | Event |
|---|---|---|
| Jul. 2024 | Town Council | Overrules town PC on Copper Ridge substation, 6-2 |
| Jul. 2024 | — | EdgeCore acquires the Cielo project |
| Aug. 7, 2024 | SCC | Approves Germanna line and substation for AWS, $54.3M (PUR-2023-00206) |
| Jan. 2025 | — | Peterson sells the shovel-ready campus for a reported $302M; STACK takes over |
| Mar. 11, 2025 | Town Council | Approves STACK noise-standard amendment 6-2-1 |
| Sept. 2, 2025 | County BOS | Ends by-right data centers outside the zone, unanimous; five projects vested |
| Oct. 14, 2025 | Town Council | Adopts UDO with overlay effectively prohibiting new data centers in town |
| Oct. 28, 2025 | Town Council | Approves Dominion premise agreement and $1.5M/building/year revenue floor, unanimous |
| Nov. 4, 2025 | Voters | Three county supervisors replaced; mayor defeats anti-data-center challenger 54-45 |
| Early 2026 | County BOS | County administrator fired after the board turnover |
| Mar. 12, 2026 | SCC | Approves the four-substation Culpeper Tech Zone loop (PUR-2025-00032) |
| Apr. 7, 2026 | County BOS | Resolution opposing Valley Link 765 kV line and Yeat substation, 6-1 |
| Apr. 8, 2026 | Governor | HB 507 signed (Tier IV generator requirement) |
| May 19, 2026 | County BOS | Dominion reports 2,435 MW of county delivery-point requests |
| Jun. 2, 2026 | County BOS | Letter to PJM opposing the Yeat relocation |
| Jun. 12, 2026 | — | Evidence snapshot; state budget unresolved |
| Jun. 29, 2026 | Governor | Budget approved (Chapter 1, 2026 Special Session I): sales and use tax exemption kept; consumption tax, Item 3-5.24 |
| Jul. 2026 | PJM | Board approves the Yeat scope change (substation about 15 miles south; line 115 miles) |

## ENDNOTES

[1] Dominion Energy presentation to the Culpeper County Board of Supervisors, May 19, 2026, reported in "'NoVa needs power? Put it up there,' Culpeper supervisor says," Culpeper Times/Rappahannock News, June 2, 2026. Square-footage total: the Part One table; press counts at note 13.

[2] Data Center Frontier, "Virginia's Culpeper Tech Zone Encourages Data Center Development, Heads Off NIMBY," June 12, 2024; Data Center Knowledge, "From Civil War Battleground to Data Center Hub," August 2024; chooseculpeper.com, "The Culpeper Tech Zone Story"; Culpeper County Economic Development, Culpeper Tech Zone page (chooseculpeper.com/ctz/, read October 24, 2026; "The 950-acre zone encompasses eight campuses," map dated July 2026). *The consolidation ordinance's adoption date is not established in accessible sources; planning began 2021. It is an open item in Part Eleven.

[3] Town of Culpeper government pages (culpeperva.gov); Culpeper County Comprehensive Plan (2015), ch. 7. Populations are round approximations from recent census estimates.

[4] Data Center Dynamics, "Culpeper County — the new Ashburn?," November 5, 2024 (Federal Reserve facility from the 1960s, Culpeper Switch, Swift data center in the 1980s, Terremark/Verizon/Equinix history; the piece places Terremark's site at 18155 Technology Drive); Baxtel, Equinix Culpeper Campus profile (CU1-CU4 figures); Baxtel, SWIFT Culpeper profile. *The Mount Pony name and the 1969 date are not in the Data Center Dynamics piece and rest on no source cited here.

[5] Data Center Dynamics, "Culpeper County — the new Ashburn?," November 5, 2024. Quotations: Bryan Rothamel, director of Culpeper County Economic Development ("pathway community"; "We were prepared…"); Lilli Flynn, DC Byte; Julie Bolthouse, PEC. The 500-acre inquiry refusals are Rothamel's account in the same piece.

[6] Dgtl Infra, "Amazon Data Center Culpeper Virginia" (243 ac, 427,000 sq ft, 20420 Germanna Hwy); Culpeper Star-Exponent, "Amazon data center materializes in Stevensburg, now hiring," October 5, 2024; Star-Exponent, April 2, 2026 (Building A complete). *Acreage is reported as both 230 and 243, square footage as 427,000, "up to 430,000," and 445,000 across sources; the proffer statement, not obtained, would settle them.

[7] Daily Progress, "CloudHQ invests $12 million for 100-acre Culpeper data center site," September 2022; Data Center Dynamics, "CloudHQ acquires 100 acres in Virginia's Culpeper County," 2022; datacentermap.com CLP campus listing (three

buildings, 142 MW critical). *Reported campus power ranges from 142 to 275 MW depending on source and build stage.

[8] Data Center Dynamics, “DataBank acquires 85 acres in Virginia’s Culpeper for 192MW data center campus,” November 14, 2023; DataBank campus page; Culpeper Star-Exponent, “Data center construction ramps up in Culpeper,” October 9, 2025 (2019 Red Ace approval; construction status). *Completion dates are reported as both Q3 2026 (DataBank) and early Q2 2027 (DataBank VP Tony Qorri to the Star-Exponent); square footage as 1.4M gross and “nearly 1.3M.”

[9] Culpeper Star-Exponent, “County approves McDevitt Dr. rezoning for Culpeper Technology Campus,” July 6, 2023; Culpeper Times/InsideNoVa, July 2023; Peterson Companies announcement; Baxtel, Peterson Culpeper Technology Campus profile (2,049,058 sq ft). Town-side rezoning: Star-Exponent, “Town spurs heavy industrial rezoning for data center development,” February 2023, and September 2023 Copper Ridge coverage describing the council-initiated 230-acre industrial rezoning.

[10] Culpeper Star-Exponent, “Town approves data centers beside Culpeper National Cemetery,” September 2023; InsideNoVa, same week; Data Center Dynamics filing coverage (2.36M sq ft, eight buildings, three phases); PEC, “Updates on Copper Ridge Data Center Campus Proposal.” *One Baxtel summary gives six buildings and 4.3M sq ft, conflicting with DCD and PEC; and the vote is rendered both as 6-0 with one abstention (Brown) and one absence (Yowell), and as 7-0 with an abstention. See also note 32. One account dates the vote September 5; the council’s regular second-Tuesday calendar supports September 12.

[11] Culpeper Star-Exponent, “‘Embrace the limited market’: Culpeper greenlights another data center,” December 2023 (5-2 vote, proffer detail); Star-Exponent, “County planners: latest data center ‘in substantial accord’ with comp plan,” November 2023; InsideNoVa, December 2023.

[12] Data Center Dynamics, “Data center campus in Virginia’s Culpeper County gets approval,” July 2024 (4-3 vote: Deal, Durr, Gugino, Underwood for; Bates, Lee, Rosenberger against; $14-19M/yr projection*); Star-Exponent, “Culpeper County supervisors pause data center application,” June 2024 (6-1 tabling); Baxtel, Red Ace Bldg A and campus pages (four 290,000 sq ft buildings, 69.19 acres). *DCD’s full text was inaccessible to verification; vote and projection rest on search-retrieved text.

[13] Virginia Mercury, Evan Visconti, “Local governments race to attract data centers, often in spite of concerns from their constituents,” April 24, 2026 (photo caption: eight campuses); PEC Culpeper materials (“over 10 million square feet”*);

InsideNoVa/Culpeper Times, “Data center boom transforms Culpeper,” August 2024 (“over 13 million square-feet… on nearly 1,000 acres”). *The 10M/13M discrepancy is unresolved; the 13M figure includes town and county and may count built legacy space.

[14] Culpeper Star-Exponent, “Eyeing Amazon potential, Culpeper County proposes tech zone expansion” (Amazon-HQ2 era; 80% example) and “A closer look at Culpeper County’s technology zones.” *The 80% (legacy) versus 40% (current CTZ) rebate figures both appear in press without a single source reconciling the evolution.

[15] Culpeper County Economic Development incentives page (chooseculpeper.com), accessed June 12, 2026; Culpeper Star-Exponent, “‘A slam dunk’ — Culpeper Economic Development prepares for data center growth,” June 27, 2024 (height bonus “a huge incentive,” Rothamel).

[16] Data Center Frontier, June 12, 2024; Rothamel quotation from the Star-Exponent “slam dunk” feature, June 27, 2024.

[17] American Battlefield Trust, “American Battlefield Trust Disappointed with Approval of Amazon Data Centers in Historic Stevensburg,” April 2022 (coalition, Hansbrough’s Ridge description); Culpeper Star-Exponent and Culpeper Times tour coverage, March-April 2022.

[18] Culpeper Star-Exponent, “Culpeper supervisors OK Amazon data-center rezoning,” April 2022 (vote breakdown, hearing length); CBS19/29News, April 7, 2022; Star-Exponent, “Culpeper County planners narrowly deny Amazon data center rezoning,” March 2022.

[19] Culpeper Star-Exponent, “Neighbors sue Culpeper supervisors over data centers rezoning,” May 2022; Data Center Dynamics; The Register, May 10, 2022; Bisnow, May 2022. *No coverage of the suit’s disposition was found; the Virginia Mercury’s April 24, 2026 retrospective states the lawsuit failed. The circuit court file is an open item in Part Eleven.

[20] Culpeper Star-Exponent, October 5, 2024 (berm, conservation easement, well/septic proffers as built); Star-Exponent, April 2026 (“A closer look at Stevensburg data centers…”). *The executed proffer statement has not been obtained; no cash proffer appears in any press account.

[21] Culpeper Star-Exponent, “Board approves 100-acre rezoning for potential data center along McDevitt Drive” (unanimous vote, $50,000 traffic-circle proffer, parcel history) and “Culpeper planning commission tables data center rezoning,” May 2023. *The exact board date and the CloudHQ-PowerGrid parcel relationship

are unestablished; the rezoned ground appears to be or adjoin the CloudHQ campus.

[22] Commercial Observer, “Peterson sells shovel-ready NoVa data center site for $302M,” January 2025. *The buyer’s identity in that piece is not confirmed; STACK’s current control of the campus is established by Baxtel, PEC, and town records.

[23] EdgeCore press release, July 2024; Culpeper Star-Exponent, “EdgeCore acquires Cielo data center project in Culpeper,” July 2024; Data Center Dynamics, July 2024. The Cielo entitlement ran to 2.4M sq ft and a 240 MW minimum; EdgeCore’s announced initial build is the smaller figure.

[24] Culpeper Star-Exponent, “Brandy Station landowner proposes three data centers on his tech zone property” (2022); Daily Progress, “Planning commission rejects rezoning for Brandy Station data centers,” October 2022; Star-Exponent, “Brandy Station Technology Zone eliminated, data center site evaporates,” January 2023; Data Center Dynamics, January 2023.

[25] PEC alert, May 30, 2024 (acreage, load estimate); Data Center Dynamics, “County planners recommend denial of Brandy Station data center campus,” June 2024; county BoardDocs, case Z-463-24-1 public submittals (primary); Virginia Mercury, April 24, 2026 (withdrawal); American Battlefield Trust and Virginia DCR on the state park’s June 8, 2024 dedication.

[26] Culpeper County, Voluntary Settlement Agreement program entry, Virginia Association of Counties 2012 Achievement Awards (terms, March 28, 2012 final order, rate history, 1.5 MGD cap).

[27] Town of Culpeper, Water Production Facility page (4.0 MGD); Culpeper County Comprehensive Plan (2015), ch. 7 (WWTP ~6.0 MGD*). *Both capacity figures predate the buildout; current permitted capacities and committed flows are open items in Part Eleven.

[28] Virginia Department of Historic Resources, Culpeper Municipal Electric Plant and Waterworks, listing 204-5097 (Virginia Landmarks Register December 13, 2018; National Register April 2, 2019; read October 24, 2026); Town of Culpeper Light and Power Department pages; FindEnergy provider profile (meter counts, approximate).

[29] InsideNoVa/Culpeper Times, “Culpeper Town Council secures data center revenue agreements, one worth millions,” November 6, 2025 (premise agreement, $1.5M floor, 13 buildings, Hively quotations, Russell’s failed $3M motion and process objection, Manassas precedent).

[30] Culpeper Star-Exponent, “Here come the new data centers, Culpeper. At least one project will use reclaimed water,” April 2, 2026 ($30.1M, cost history, 5% overhead, Mountain Run discharge reduction, fall 2026 start, “sole customer”).

[31] PEC, “Culpeper updates: opportunities to protect farmland and uphold data center noise standards,” November 19, 2024 (STACK-funded water tower via proffer changes).

[32] Culpeper Star-Exponent, “Town council approves data center substation,” July 2024 (6-2 overrule; Russell statement; planning director’s “omission” admission); InsideNoVa, June 25, 2024 (the split §15.2-2232 conformity findings).

[33] Culpeper Star-Exponent, March 2025 (6-2-1 vote: Rimeikis and Russell no, Brown abstaining; resident and PEC testimony; consultant findings); PEC, December 2024 updates (the November 19, 2024 town PC recommendation, 4-1, and the December 10 deferral).

[34] Culpeper Star-Exponent, town UDO coverage, October-November 2025; Town of Culpeper UDO as approved October 14, 2025 (files.culpeperva.gov, primary). The overlay’s exact prohibition mechanics are not quoted here from the ordinance text.

[35] VPAP, Culpeper mayoral results, November 4, 2025 (Reaves 3,132, Russell 2,609); InsideNoVa race preview; VPAP town council results (Amos 12.51%, not elected).

[36] Virginia Mercury, April 24, 2026 (site plan rejections, generator-bay denial, Dowdy FOIA emails, “unprecedented access”); PEC, “Tell Culpeper officials to hold their ground,” April 2, 2026 (ordinance O-2026-003). *O-2026-003’s final disposition is unverified at the snapshot.

[37] Fredericksburg Free Lance-Star, September 2025 (acreage and parcel counts, vesting); Culpeper Star-Exponent, September 2025; PEC, “Culpeper puts guardrails on data centers,” September 17, 2025.

[38] PEC, September 17, 2025 (campaign and the incentive-revisit signal).

[39] Culpeper Times/InsideNoVa, “Culpeper votes for change on the county board of supervisors,” November 2025; VPAP district results; Star-Exponent candidate and forum coverage; Star-Exponent, administrator firing coverage, early 2026. Gugino’s CUP platform: Star-Exponent, February 2025.

[40] Culpeper Star-Exponent, “Dominion to Culpeper supervisors: data centers fueling 214% growth in power demand,” September 2023.

[41] Valley Link Transmission, Joshua Falls-Yeat project page; Cardinal News, March 12 and March 26, 2026; PJM 2024 RTEP selection announcements, February 2025; Potomac Local, February 13, 2026 (relocation detail). Yeat site size: PEC, “Culpeper County Takes on Transmission Lines in Comprehensive Plan Amendment,” August 26, 2026 (“an 88-acre substation”); Culpeper Times/InsideNoVa report of the May 19, 2026 board meeting (“a 448-acre property” with “approximately 127 acres planned for development”). PUR-2025-00220 as the index held it on October 7, 2026: Tommy N. Turner, Orange County case study, v3.1, note 54, 10.5281/zenodo.20672496. PJM Interconnection, “Transmission Expansion Advisory Committee (TEAC) Recommendations to the PJM Board,” staff white paper, July 2026 (pjm.com/-/media/DotCom/committees-groups/committees/teac/2026/20260707/20260707-pjm-board-whitepaper.pdf), Section IV (scope change, 15 miles, 156 to 115 miles, $259.84 million cost decrease) and Section V (correspondence); the white paper dates the Board’s approval July 15, 2026. PJM Inside Lines, “PJM Board Approves Transmission Project Addition, Changes To Support Grid Reliability,” July 16, 2026, dates the approvals July 14. PJM’s two statements disagree on the day, and the Board’s minutes were not read. PJM Interconnection, letter of David E. Mills, President & CEO, July 16, 2026 (pjm.com/-/media/DotCom/about-pjm/who-we-are/public-disclosures/2026/20260717-board-response-to-multiple-correspondences-related-to-joshua-falls-yeat-765kv-project.pdf). SCC filing status: Virginia SCC DocketSearch caption search, October 10, 2026, of the PUR-2026 cases the index returned through PUR-2026-00168 (established through October 9, 2026) for Valley Link, Joshua Falls and Yeat: no match; five case numbers in that range (PUR-2026-00156, -00163, -00164, -00166, -00167) are not returned by the index, and a caption search does not find a case filed under another name (Tommy N. Turner, Concentrated Benefit, Dispersed Burden, v1.3, note 11, 10.5281/zenodo.21895588). Valley Link Transmission, Joshua Falls-Yeat project page (vltransmission.com/joshua-falls-to-yeat, modified October 1, 2026; schedule lists the SCC filing for the third quarter of 2026). Piedmont Environmental Council, “Board to Vote on Proposed Comprehensive Plan Amendment Limiting Transmission Line Impacts in Culpeper,” September 29, 2026 (Dominion’s planned November filing).

[42] Culpeper Star-Exponent, “Culpeper says no to Valley Link high-voltage project,” April 9, 2026 (6-1 resolution, Payne and Martin quotations, Underwood’s “200 to 1”); county press release, April 17, 2026; InsideNoVa, June 2026 (the PJM letter); Culpeper Times/Rappahannock News, June 2, 2026 (Bates quotation; Dominion’s Richardson on diffusion).

[43] Data Center Knowledge, August 2024 (Dominion/REC split in the zone, “optionality”); campus assignments per notes 6-12 and 29; SCC electric service territory map.

[44] Dominion Energy, Cirrus-Keyser project page (filed Nov. 21, 2022; final order reported Dec. 23, 2023*); Culpeper Star-Exponent, “Dominion, in rare move, details data centers’ big electricity demands,” September 2023. *The reported order date falls on a Saturday and is not checked against the docket.

[45] Dominion Energy, Germanna project page (PUR-2023-00206; $54.3M; April 2026 construction start); Culpeper Star-Exponent, “Board picks southern route for Dominion lines to Amazon data center in Stevensburg,” October 2023; Star-Exponent guest commentary, “Who will pay the price for data center power?,” May 2024 (rate-spread argument; an opinion piece, flagged as such).

[46] Dominion Energy, Culpeper Tech Zone project page (filed Feb. 20, 2025; final order March 12, 2026; substation names); PEC, “Culpeper Update: More Power Infrastructure Headed Our Way,” and PEC comments in PUR-2025-00032, September 16, 2025 (1.8 GW estimate); Culpeper Star-Exponent, “County supports Dominion 230kV upgrade to feed data centers,” January 2025. *Project cost is not stated in the public summaries read for this report.

[47] CoBank Knowledge Exchange, REC large-load case study (system peak, 20 GW requests, ODEC resolutions); Latitude Media, REC business-model coverage; Virginia Mercury, April 25, 2025 (“told REC to look elsewhere”); REC 2024 data center forecast to PJM Load Analysis Subcommittee, October 25, 2024.

[48] REC, “Balancing Growth and Affordability: REC Announces Hyperscale Energy Services”; Virginia DLAS overview of electric cooperative data center tariffs (PUR-2024-00015, PUR-2025-00048, the July 1, 2025 Code amendment); Virginia Mercury, April 25, 2025 (tariff structure). PUR-2025-00048: SCC Final Order, March 20, 2026, approving Schedule LP-DF subject to the Commission’s determinations. *PUR-2024-00015’s final disposition is not established in the sources read for this report.

[49] Culpeper County Economic Development tax page (chooseculpeper.com), accessed June 12, 2026 ($3.50, accelerated depreciation, no BPOL); InsideNoVa, November 6, 2025 (the town manager citing the county’s “higher tangible personal property tax rate”); Town of Culpeper tax rates page (town $1.00 equipment, $0.061 real estate). Comparison rates from the series’ deposited volumes: Henrico v3.7 ($2.60 from 2025), 10.5281/zenodo.20671031; Hanover v3.0 ($0.45 for calendar year 2026, adopted June 24, 2026), 10.5281/zenodo.20672048; Prince William v3.2 ($4.50 from April 2026), 10.5281/zenodo.20673498; Loudoun v1.0

($4.15 since tax year 2023), 10.5281/zenodo.22374193. Culpeper County Treasurer, “County Tax Rates” (web.culpepercounty.gov/treasurer/page/county-tax-rates, read October 24, 2026): Personal Property and Business Furniture, Fixtures & Equipment at $3.50 per $100 of assessed value; the page names no computer-equipment or data center class.

[50] Culpeper Star-Exponent, April 2026 (the February 2026 study: $1.79B gross, $667M incentives, $57M to the town, $1.35B county net). *The study itself has not been obtained; methodology unexamined. As reported, the four figures do not reconcile: $1.79 billion less $667 million and $57 million is about $1.07 billion, not $1.35 billion.

[51] Culpeper Star-Exponent, spring 2025 rate coverage (Underwood quotation; 6-1 adoption) and March 11, 2025 (Deal on timing; the board’s request for an EDA revenue schedule; 2028 buildout).

[52] Rate table assembled from: InsideNoVa, May 2022 (2020-2022 rates, FY21 budget); Star-Exponent, “Culpeper County adopts equalized real estate tax rate of 55 cents” (2021); Star-Exponent, March 2023 (2023 rate); Star-Exponent, May 2024 (2024 rate, $824,539, new-construction revenue); Star-Exponent and InsideNoVa, April 2025 (2025 rate, 17.22% reassessment, school debt figures); InsideNoVa, May 2026 (FY27 adoption). The 2026 rate: Culpeper County Treasurer, “County Tax Rates” (web.culpepercounty.gov/treasurer/page/county-tax-rates, read October 24, 2026), whose rate list labels $0.45 ($0.37 base plus $0.08 Fire and Rescue levy) as 2026 and lists no data center class; the page’s current-rates heading reads “Approved by Board of Supervisors on 05/06/2025” and states no tax year, so the year rests on the list’s label and the FY27 adoption coverage. The penny value ($969,560) is the county’s own figure.

[53] Northern Virginia Technology Council, 2026 Virginia Data Center Report, PDF page 25 (2024 rates with and without data center tax revenue: $0.430 and $0.577); Progress Chamber summary of the same, accessed June 12, 2026. *Industry-commissioned; the implied contributions (14.7 cents × $969,560 per penny ≈ $14.3M; × $824,539 ≈ $12.1M) are the author’s arithmetic from the county’s penny value and cannot be reconciled with supervisors’ statements that data center revenue has not arrived. Both claims are presented; neither is endorsed.

[54] InsideNoVa/Culpeper Times, April 14, 2022 (attorney John Foote’s $5-8M; the EDA’s ~$23M five-year equipment estimate and $330M equipment assumption); note 12 (Keyser Farm); Star-Exponent, March 11, 2025 (the $100M “eventually,” Vice Chairman Deal); note 29 (the town floor). A “$1.96 billion gross incremental tax revenue” figure circulates without clear attribution and is excluded pending sourcing.*

[55] Culpeper Star-Exponent, September 2023 (Parmelee's $0.23 vs. $0.66 comparison at the Copper Ridge hearing). Series comparison rows: Hanover v2.0 source, "What Was Never Committed" table, and the underlying Chesterfield ZOMod, PWC Sustainability Commission, and Loudoun ZOAM-2024-0001 citations therein.

[56] Daily Progress, September 2022 (2018 and 2022 McDevitt sales); CoStar via EdgeCore coverage (Cielo's $18.75M, May 2023); Commercial Observer, January 2025 ($302M). Per-acre figures are the author's arithmetic. *The $2M/acre characterization divides the reported sale price by the ~150-acre campus and is an approximation until the transaction's actual parcel scope is known.

[57] PEC organizational materials (Warrenton headquarters since 1972); PEC Culpeper region pages and the testimony record cited throughout; FauquierNow, "Piedmont Environmental Council facing off with Big Tech over data centers."

[58] PEC, December 2024 updates (the coalition's formation); saveculpeper.com, "Concerns" and "Un-Hallowed Ground" (demands, FOIA work); Star-Exponent, "Coalition to Save Culpeper seeks to curtail data centers," November 2024; InsideNoVa, November 6, 2025 (the revenue-agreement challenge).

[59] JLARC, "Data Centers in Virginia," Report 598 (December 9, 2024): data centers and tenants reported $928.6 million in sales tax savings in FY23 from the exemption, the state portion an estimated $683 million; Virginia Mercury budget coverage, March-April 2026; WHRO, June 12, 2026 (impasse standing at snapshot); Cardinal News, May 28, 2026 (Spanberger: "I'm not going to break a contract the state has signed"). Approval: Legislative Information System, HB 30, 2026 Special Session I, bill history, June 29, 2026 entry "Approved by Governor-Chapter 1 (effective 7/1/2026)" (lis.virginia.gov/bill-details/20262/HB30). Tax terms: 2026 Appropriation Act, HB 30, Chapter 1, 2026 Special Session I, Item 3-5.24, "Data Center Electricity Consumption Tax" (budget.lis.virginia.gov/item/2026/2/HB30/Chapter/3/3-5.24/). Exemption kept: Virginia Mercury, "Virginia has a new two-year budget. Here's what lawmakers now require of data centers," June 30, 2026.

[60] Governor's news release, April 8, 2026 (HB 507); MultiState, March 30, 2026 (the session's fifteen data center bills); Virginia Mercury, March 17, 2026. SB 553 (2026), Chapter 896, approved April 13, 2026, effective January 1, 2027, identical to HB 496 (Chapter 623) (Legislative Information System, 2026 Acts of Assembly; lis.virginia.gov/bill-details/20261/SB553).

[61] Culpeper Star-Exponent, October 5, 2024 (AWS job postings: TS/SCI with polygraph, shift structure, ~365 construction personnel, ~90 permanent at build-out) and October 9, 2025 (DataBank's 350-770 construction workers, ~40 FTE, sheriff's paid details, fire-training donation); Star-Exponent, June 27, 2024 (Rothamel's 30-40 per building).

*Prepared by Tommy Turner · Evidence snapshot June 12, 2026; updated through October 24, 2026, for the items dated in the text. Asterisks mark claims resting on secondary sources or awaiting primary verification; see Part Eleven.*