
INDEPENDENT ANALYSIS

Governing the Demand Shock

A Virginia Data Center Analysis

Local institutional variation in the commonwealth's data center expansion, and how the timing of reform determined who paid

Virginia

Prepared by Tommy Turner

Williamsburg and Christiansburg, Virginia

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ABSTRACT

Virginia hosts the largest concentration of data centers in the world, and between roughly 2018 and 2026 the industry moved out of its Northern Virginia core into more than two dozen counties and independent cities. Each jurisdiction absorbed a version of the same shock: a capital-intensive, power-hungry, low-employment land use arriving faster than the local review tools built to handle it. The jurisdictions did not respond the same way, and this report treats that variation as its subject. Drawing on thirteen jurisdiction-level case studies and a statewide inventory of 286 facility records, it argues that the decisive variable separating communities that admitted the industry on terms from those that did not was neither geography nor project size. It was the timing of local institutional reform relative to the industry's arrival, and behind timing, the quantity of bargaining leverage a community still held when it acted.

The report develops a five-posture spectrum of local response: reform-after, refusal-before, contract-lock, governance-capture, and pre-entitlement-by-ordinance. It positions each studied jurisdiction on that spectrum with a full case treatment, maps the spectrum onto the geographic diffusion of the industry across the commonwealth, and traces the cross-cutting patterns the cases share: a steep upward ratchet in the equipment-tax rate, the irreversibility of leverage traded away in private contracts, water as the emerging binding constraint, a disclosure vacuum that leaves the state unable to measure what it subsidizes, and a grid externality that local approval summons but cannot govern. A single auditable case, fifteen years downstream of its first commitment, anchors the otherwise prospective record and confirms that promised revenue and delivered revenue diverge in ways the standard sales pitch does not disclose. The state policy frame, a generous sales-tax exemption paired with weak local tools, structured the whole field by tilting every county toward maximum development. The report closes with the implications that follow from the evidence rather than with a reform program.

Keywords: data centers; local government; land-use regulation; economic development incentives; electricity ratepayers; Virginia; institutional analysis

EXECUTIVE SUMMARY

The bottom line. Virginia ran an unintended natural experiment. Between 2018 and 2026 it exposed more than two dozen local governments to the same industry, under the same state subsidy, served largely by the same regulated utility, and the governments responded in measurably different ways. The variation was not

random and it was not principally geographic. It tracked one variable, the timing of institutional reform relative to the industry's arrival, and behind that variable a deeper one: the quantity of bargaining leverage a community still held when it chose how to act. A county's power to dictate terms is highest before it has approved anything and decays with every commitment. Reform undertaken late governs only the residual, the parcels not yet entitled and the rates not yet locked. This report documents the pattern across thirteen jurisdictions and explains why it holds.

The common shock. Every jurisdiction faced the same five pressures at once. A fiscal lure, in the form of hundreds of millions of dollars of taxable equipment, sat atop a state sales-tax exemption that cost the commonwealth \$1,941,390,000 in forgone revenue in fiscal year 2025. A thin employment return followed: a typical facility employs roughly fifty workers once built, about half of them contractors. A grid consequence escaped local control entirely, as data centers reached roughly a quarter of all electricity used in Virginia and drove residential bill projections from \$159 toward \$308 by 2035. A set of physical externalities, chronic low-frequency noise, water demand, and historic and scenic loss, surfaced after approval rather than before. And a disclosure vacuum hid the magnitude of all four, since Virginia requires no facility-level reporting of power, water, or investment.

The five postures. The cases sort onto a spectrum of leverage spent and leverage held. Counties at the reform-after pole, Loudoun and Henrico, permitted the industry under rules written for ordinary commerce and reformed only after the largest entitlements had vested. Counties at the refusal-before pole, Hanover among them, declined the flagship project outright while their discretion was intact. Between them lie contract-lock, where Chesterfield and Botetourt fixed tax rates in private agreements that bind future boards; governance-capture, where Prince William's fiscal dependence and procedural shortcutting reinforced each other until a court intervened; and pre-entitlement-by-ordinance, where Louisa, Goochland, Culpeper, and Orange wrote demanding rules before the first application and made entry conditional on meeting them. The pre-entitlement posture produced the most favorable balance of captured benefit to contained cost, and it was also the most demanding to sustain and the easiest to undermine.

The auditable case. Mecklenburg is the one jurisdiction old enough to audit. Fifteen years after its first hyperscale commitment, data center taxes supply between 35 and nearly 48 percent of its general fund, and for most of that period the county rebated 82.5 percent of the operator's personal property tax back to the operator, more than \$275 million across fiscal years 2019 through 2024, before a 2024 restructuring let the general fund begin to capture it. The host town lost a

third of its population over the period. During a 2014 expansion, thirty-seven graves of a Black farming family were excavated and relocated to make room for the campus. The prospective cases describe risks. Mecklenburg describes what the risks become.

The cross-cutting patterns. Five patterns recur regardless of posture. The equipment-tax rate ratcheted from \$0.24 to \$4.50 per \$100 as counties gained experience, and the two counties that fixed the rate by private contract removed themselves from the ratchet permanently. Water displaced electricity as the externality most likely to actually stop a project, and it was also the most tightly withheld, to the point that a court had to rule that a data center's water use is not a trade secret. Promised revenue and delivered revenue diverged, and announced investment proved to be a promotional genre rather than an accounting category. The grid externality migrated beyond local authority and, in the newest instances, beyond the regulator, as a grid-scale fusion power-purchase agreement bypassed the utility, the State Corporation Commission, and ratepayer cost recovery entirely. And where the model broke down, it broke down through a procedural shortcut or a conflict of interest paired with a failure of the disclosure systems meant to catch it.

The state frame. The local variation did not occur on neutral ground. By offering a generous exemption while withholding the tools to manage the consequences, the commonwealth tilted every county toward the development pole. The decisive unanswered question, how much of the industry's investment would have come without the exemption, Virginia has never studied; the available estimates, drawn from observed behavior rather than self-report, place the attributable share well below the figure the beneficiaries claim. The 2026 General Assembly began to redistribute the management tools while leaving the central subsidy in place, where it remained the unresolved core of a budget impasse.

What follows. This report is descriptive. Where it identifies the implications of its findings it does so as inferences from the record rather than as recommendations. The single most consequential inference is that the window in which a community can set terms opens before the development is wanted most and closes as soon as the first approvals vest, and that the cost of waiting is paid in the specific entitlements reform can no longer reach.

A NOTE ON METHOD AND VOICE

This report synthesizes thirteen jurisdiction-level case studies and one statewide facility inventory. It describes how Virginia’s localities have behaved and why the outcomes differ. It is not a brief for a particular reform, and where it identifies the implications of its findings it does so as inferences from the record rather than as recommendations. The companion case studies, listed in Appendix H and cited individually where their findings are used, carry the full primary-source apparatus for each jurisdiction; this report points to them rather than reproducing them. Local officials are referred to by role rather than personal name to keep the focus on institutional behavior; the companion volumes carry the named record. Courts and published decisions are cited in the ordinary way. Analytical lenses are identified by the type of work they perform, for example the utility finance framework or the distributional justice framework, rather than by author. The full method, including the treatment of the disclosure vacuum that shapes every aggregate figure, is set out in Appendix A.

PART ONE — THE DEMAND SHOCK

Before the variation in local response can be explained, the thing being responded to has to be specified. Every Virginia jurisdiction that confronted a data center proposal between 2018 and 2026 faced some version of the same five pressures at once: a fiscal lure, a thin employment return, a grid consequence that escaped local control, a set of physical externalities the review process handled poorly, and a disclosure vacuum that hid the magnitude of all four. The pressures were broadly constant across the commonwealth, set by state policy, utility economics, and the physics of the technology rather than by any local choice. They are the shock. The state's own legislative oversight body documented the first four in a single 2024 assessment, which gives this report a common evidentiary floor and gives every county board the same baseline it was entitled to know before it voted.

SECTION 1: THE SCALE OF THE SHOCK

The Joint Legislative Audit and Review Commission published Data Centers in Virginia on December 9, 2024, the most comprehensive assessment any state legislature has produced of the industry's costs and benefits. JLARC is the General Assembly's own investigative arm; its researchers operate independently of the executive branch, and its findings are not a critic's claims but the conclusions of the institution the legislature created to give it reliable information. Its central finding is one of scale: unconstrained demand for power in Virginia would double within ten years, with data centers as effectively the only driver of the growth. The concentration behind that forecast is already the highest in the country. Dominion Energy Virginia reported data centers at 24 percent of its electricity sales in 2023 and 28 percent in 2025, in audited annual filings; the Electric Power Research Institute, measuring statewide rather than one utility's book, put data centers at 25.6 percent of all Virginia electricity consumed in 2023, against roughly 15 percent in North Dakota, the next highest state.[1]

The word "only" is not rhetorical. JLARC's independent forecast showed Virginia's electricity demand essentially flat from 2006 to 2020, before data center growth changed the trajectory. Without new data center load, that forecast has the commonwealth's energy use rising about 15 percent by 2040. With it, the figure is 183 percent. The regional grid operator's 2025 long-term load forecast attributes 94 percent of projected peak-load growth between 2024 and 2030 to data centers, and the Electric Power Research Institute projects the industry could consume between 39 and 57 percent of Virginia's electricity by 2030 depending on how much of the pipeline reaches operation.[2] A single sector is now shaping the planning of the regional grid, which means it is reconfiguring a major public

system, and it is doing so on a timescale measured in a few years rather than a few decades.

The scale matters for the analysis because it changes what kind of object a data center is for a county to govern. A use that draws power at this concentration is a utility-intensive, capital-heavy facility whose off-site consequences cross jurisdictions far from the hearing room that approved it, rather than an ordinary commercial tenant with attractive tax numbers. JLARC found, and the case studies confirm, that too many local processes still treated data centers as ordinary commercial projects. The gap between what the industry is and how it was reviewed is the space in which the institutional variation of this report took place.

SECTION 2: THE SPLIT FISCAL INCENTIVE

The proximate attraction is tax base. A data center campus places hundreds of millions, sometimes billions, of dollars of taxable equipment inside a county that taxes business personal property at a locally set rate. For a rural county with a thin commercial base, the arithmetic is arresting, and the case studies are full of officials reciting it. Behind the local lure sits the state subsidy that makes Virginia attractive in the first place: the retail sales and use tax exemption on data center equipment and enabling software, which the Virginia Department of Taxation reported cost the commonwealth \$1,941,390,000 in forgone revenue in fiscal year 2025. The exemption covers qualifying projects that invest at least \$150 million and create at least fifty jobs, and it is the reason a company comparing states finds Virginia's effective equipment cost lower than most competitors'.[3]

The structurally important feature is that the state-level lure and the local-level lure accrue to different governments. The sales-tax exemption is a state decision whose benefit flows to the operator and whose cost falls on the state treasury and, through the local share of the sales tax, on every locality including those that host no facilities. The equipment tax is a local decision whose benefit flows to the host county. A county weighing a project therefore sees the local revenue clearly and pays none of the exemption's cost directly. The state has, in effect, pre-loaded the incentive structure in favor of local approval: it hands the county the upside and absorbs much of the downside itself. A board inclined to maximize development can simply accept the state's pre-loaded incentive and vote yes. A board inclined to manage the industry on terms has to build its own instruments against that tilt. This asymmetry recurs in every case in PART THREE, and it is the reason the state frame in PART SIX is treated as the structuring condition of the whole field rather than as background.

Virginia's sales and use tax rate is approximately 5.3 percent in most jurisdictions, of which one percentage point is local. Applied to the roughly \$1.9 billion in FY2025 exempted purchases, the forgone local share alone runs on the order of \$360 million, revenue that would otherwise flow to localities across the commonwealth, including counties that receive no property-tax benefit from the industry's presence.[4] The exemption is, on the state's own accounting, the largest single economic-development tax preference the commonwealth deploys: JLARC found that data centers avoided approximately \$2.7 billion in state sales and use taxes from fiscal years 2015 through 2024, more than half of all economic-development tax incentives the state granted over that period.[5]

SECTION 3: THE THIN EMPLOYMENT RETURN

The standard justification for any tax incentive is jobs, and data centers are where that justification is weakest. JLARC found that a typical 250,000-square-foot facility employs roughly fifty full-time workers once operational, about half of them contractors. Georgia's evaluation of its own industry reached a consistent figure, reporting 1,873 permanent data center employees across all facilities statewide and noting that the buildings are designed to run with very few people. An econometric study of Texas data center openings by Ball State University's Center for Business and Economic Research found the net effect on county-level employment across related industries to be effectively zero, with the apparent gains reflecting reclassification of existing workers rather than new hiring.[6]

The thinness was visible from the start to anyone who read the fine print, and the oldest case in the portfolio makes the point with unusual clarity. When the first hyperscale campus came to Southside Virginia in 2010, the operator told the host town that it would station two of its own employees on site, a data manager and an operations manager, and that the promised fifty jobs would belong to a staffing contractor working in shifts. The earliest on-record description of the labor model was two badges and a vendor. A construction-trades official in the same county described what the operational reality looked like on the ground: "People thought when Microsoft came in it would create jobs, but that's just not the case. The first thing they put in was a guard shack and a fence. None of it lasts." [7]

The industry's strongest employment argument is about construction, and it has merit at the aggregate level. Data center construction is real, well compensated, and often performed by union trades; in Northern Virginia, electrical locals report that the work has doubled their members' hours. Because hyperscale campuses are built in phases over a decade or more, a continuous pipeline of new projects sustains a construction workforce that is not temporary the way a single building is. Two qualifications apply. Construction employment at any individual site ends

when the building opens, after which the workforce drops to the operational handful. And the sustained aggregate depends entirely on the continued flow of new projects, which depends in turn on power availability, local approvals, and Virginia's competitive position. The exemption subsidizes equipment purchases, not building contracts, so the construction work is driven by the same structural advantages that drive the industry's presence rather than by the tax preference itself.[8]

SECTION 4: THE RATEPAYER EXPOSURE

The tax exemption is the cost Virginia chose. The ratepayer exposure is the cost that arrives through the monthly utility bill, governed by the State Corporation Commission rather than the General Assembly and driven by a regulated monopoly's capital program that will take decades to pay off. JLARC's independent analysis found that a typical residential customer could face generation- and transmission-related cost increases of \$14 to \$37 per month in constant dollars by 2040, as much as \$444 a year for a household whose own consumption did not change. The dominant utility's own 2025 integrated resource planning projects larger increases: the average monthly residential bill rising from \$159 today toward \$255 by 2035 under the utility's methodology and toward \$308 under the regulator's preferred methodology.[9]

The capital program behind those projections has grown sharply and repeatedly. The utility raised its five-year capital plan to \$50.1 billion in early 2025, a sixteen percent increase driven by data center demand, and by its Q4 2025 investor presentation the plan for 2026 through 2030 had grown to \$64.7 billion. The utility has told the regulator it holds 16,913 megawatts under firm contract and a further 30,132 megawatts under study, 47,045 megawatts of additional data center demand beyond what is currently needed, that its transmission buildout alone carries a capital cost of \$28.3 billion, and that connection wait times for large new loads may stretch as long as seven years. For scale, total projected capital across the utility's generation scenarios ranges from \$91.8 billion to \$270 billion against a state operating budget of roughly \$83.3 billion.[10]

The exposure is not only a forecast; some of it has already landed. In the regional capacity auction, prices in the Dominion zone cleared at the market cap of \$444.26 per megawatt-day for the 2025/26 delivery year, an increase of more than 800 percent, and the independent market monitor attributed the majority of the rise to data center load. The SCC ordered a residential bill increase of \$11.24 per month in November 2025, and in the same period it created a new rate class, designated GS-5, for the largest users of electricity, an acknowledgment that the old rate structure was not built for this scale of concentrated load. The combined picture is

an incoherence visible in the commonwealth's own regulatory proceedings: the state subsidizes the industry's growth at the front end while the regulator scrambles to contain the downstream costs that growth imposes on ordinary customers. A note on the demand projections is warranted, because they rest substantially on generative-AI workloads that may or may not materialize as forecast. The uncertainty does not weaken the exposure. If the demand arrives, residential customers face the cost of serving it; if it does not, they face the cost of infrastructure built on forecasts that did not hold. Either way the household that had no role in creating the risk is the one positioned to absorb it.[11]

SECTION 5: GRID STRAIN AND THE TRANSMISSION CONFLICT

The ratepayer exposure has a physical counterpart, and it is not abstract. The electricity that serves data centers requires generation, transmission corridors, substations, and distribution infrastructure, all of which occupy real land, cross real communities, and impose real costs on residents who may live far from the facilities the infrastructure serves. Two features of the physical system recur across the cases: a reliability risk that has already materialized once, and a transmission conflict that arrives in a community long after the decisions that produced it.

The reliability risk is documented. On July 10, 2024, a failed surge protector on a 230-kilovolt line near Fairfax triggered an event that federal regulators now treat as a warning. Roughly sixty data centers in Northern Virginia simultaneously disconnected from the grid and switched to backup generators, an automated response to voltage fluctuation, dropping approximately 1,500 megawatts of load in milliseconds, the equivalent of a large power plant vanishing at once. The grid operator and the utility had to scramble to scale back output fast enough to prevent a cascading surplus. The North American Electric Reliability Corporation opened a task force and stated that the grid is not designed to withstand the instantaneous loss of load at that scale. The event occurred under current conditions; the contracted pipeline is many times larger than what operates today. [12]

The transmission conflict is where the late-surprise pattern is clearest. By the time a major transmission route appears on a map, the public often feels the conflict arrived suddenly. It did not. The conditions producing it built for years through load growth, planning assumptions, and the cumulative approval of very large users. Virginia's regulatory structure makes these projects consequential and slow: lines above 115 kilovolts generally require a Certificate of Public Convenience and Necessity from the SCC, and once a project is in that process the public is dealing with a formal state proceeding that can make opposition feel technical, uphill, and

late. The proposed Valley Link 765-kilovolt line and the relocation of substations to serve data-center-driven demand drew organized opposition from Piedmont counties, including formal resolutions and appeals to the regional grid operator, precisely because the route crossed communities far from the facilities the line was built to serve.[13] The transmission fights of PART FOUR's Piedmont counties are the physical externality of approvals granted in the Richmond and Northern Virginia rings, and they are a recurring demonstration that a county approval adds load to a regional grid the county does not run.

SECTION 6: WATER, NOISE, AND THE LATE-SURPRISE PATTERN

JLARC catalogued a set of local burdens that standard commercial review handles poorly: chronic low-frequency mechanical noise that ordinary sound ordinances do not measure, water demand that can exceed local permit or infrastructure thresholds, scenic and historic resources examined too late or not at all, and concentrated diesel backup fleets that raise unresolved local air-quality questions around dense clusters. The common feature of these burdens is the sequence in which they become legible. Communities hear about tax base and investment early, in the announcement and the rezoning hearing. They learn the water draw, the night-time hum, the transmission route, and the generator count afterward, often once the project is operating and practical leverage has diminished.[14]

That sequence is a structural feature of how the projects have been sold rather than an incidental quirk, and it recurs across the cases regardless of how any individual county voted. The case studies in PART THREE show it concretely: a county that approved a campus by-right without any disclosure of its water demand, an operator whose first hundred-million-dollar water commitment surfaced only under a contempt proceeding, a fleet of several hundred diesel generators sought by permit after the campus was already entitled. JLARC's own recommendations on sound modeling, viewshed analysis, and utility-impact disclosure all address aspects of the same problem, which is that the review process surfaces the benefits before the costs.

Water deserves particular emphasis because it moved, over the period this report covers, from a secondary consideration to the externality most capable of stopping a project. A hyperscale campus can draw on the order of hundreds of thousands of gallons a day on average and several million at peak, against county systems sized for ordinary growth. In one county the safe yield of the reservoir serving a 6,400-acre overlay was roughly 3.2 million gallons a day against a projected average draw approaching that figure from a single operator's two campuses; in another the decisive vote against a flagship project turned on a peak demand of two million gallons a day against a system still recovering from a service crisis. Noise operates

differently but in the same after-the-fact register: the low-frequency mechanical hum of cooling and generators is chronic, is poorly captured by the A-weighted standards most ordinances use, and becomes a lived burden only once the facility runs. The counties that addressed these burdens well addressed them before approval, in the ordinance, when the operator still needed something from the county. The counties that addressed them late addressed them in complaints.[15]

SECTION 7: THE DISCLOSURE VACUUM

Underneath the other pressures sits a measurement problem that shapes every figure in this report. Virginia does not require data center operators to publish facility-level data on power, water, or investment. Of the 286 facility records in the statewide inventory, 191 disclose no power figure, 258 disclose no water figure, and 254 disclose no investment figure. The blanks record the disclosure vacuum itself rather than gaps in the research, and they mean that every capacity and investment total available to a county, a legislator, or an analyst is a floor of unknown distance from the true number.[16]

The consequence for the analysis is methodological and it is also substantive. Methodologically, every statewide aggregate in this report, including the capacity figures in Appendix A and the inventory in Appendix D, is a lower bound; the operating fleet that discloses a power figure totals on the order of 3,100 megawatts and the disclosed pipeline on the order of 21,700 megawatts, but both understate, and the precise multiple matters less than its order of magnitude. Substantively, the vacuum means a jurisdiction deciding whether to approve a campus frequently cannot obtain, and is not entitled to demand, the operational data that would let it weigh the decision. A state cannot manage what its policy framework does not require anyone to disclose. The vacuum is at its most acute exactly where the stakes are highest, on water, which is why the first Virginia court ruling that a data center's water use is not a trade secret, discussed in PART FIVE, is a marker of how contested even basic disclosure has become. The 2026 enactment of a water-reporting mandate is the first statutory step toward closing any part of the gap, and it reaches only water.[17]

SECTION 8: THE BUT-FOR QUESTION

The most important question in the policy debate is also the one where Virginia's evidence is weakest: how much of the industry's investment would have come to the commonwealth without the exemption. Economists call it the but-for question, and Virginia has never commissioned the study that would answer it with Virginia-specific data. What exists is a range of estimates of declining reliability and rising

methodological rigor, and the honest approach is to lay them out and be direct about what each can and cannot tell us.

At the top sits the state's own survey-based figure. JLARC reported that 90 percent of data center companies said they would not have built in Virginia without the exemption, a number drawn from asking the direct beneficiaries of a subsidy whether the subsidy mattered. The predictable limitation is that companies have a financial incentive to overstate the role of the incentive, because doing so supports the policy that benefits them. A University of Virginia regional economist who has worked with JLARC on the annual incentives series has publicly placed the share of Virginia investment attributable to the exemption nearer 50 percent and declining. Georgia's commissioned econometric model, published by the Carl Vinson Institute of Government in December 2025, used actual departmental filing data on thirty-four qualifying facilities, calibrated against a national control dataset, and a fixed-effects model controlling for electricity rates, labor, wages, and interstate competition, and found that only 30 percent of Georgia's data center activity was attributable to its exemption, with the remaining 70 percent occurring regardless. The broadest empirical base, the incentives literature associated with the W.E. Upjohn Institute, finds that roughly three-quarters of all business tax incentives fail to change any firm's location decision, implying an attributable share near 25 percent.[18]

The estimates built on observed behavior all fall well below the survey number, and they converge on a direction even where they diverge on a value: as a market matures, the marginal role of the incentive shrinks. Virginia's market is the most mature in the world. The inferential distance between that evidence and the conclusion that a substantial share of Virginia's investment would occur without the exemption is not large. This report does not claim a precision the evidence cannot support. It observes only that every data point built on something other than self-report places the causal share of the exemption well below what its beneficiaries report, and that the commonwealth is paying close to two billion dollars a year without ever having measured what it is buying. The factors that actually anchor the industry in Virginia, geography, fiber, proximity to federal facilities and major internet exchange points, a deep cluster of skilled labor and vendors, and decades of compounding infrastructure, are precisely the factors the state does not have to pay for.[19]

These eight pressures define the shock. They were broadly constant across the commonwealth. What varied, and what the rest of this report explains, is what each jurisdiction did when the shock arrived at its own hearing-room door.

PART TWO — A FRAMEWORK FOR LOCAL VARIATION

SECTION 9: THE ANALYTICAL PROBLEM

By 2026 the commonwealth contained jurisdictions that had admitted dozens of facilities under rules written for warehouses, and jurisdictions a county line away that had refused the single largest project offered them. It contained a county whose general fund had become more than a third dependent on data center taxes, and a neighboring county that had never collected a dollar of such tax and used that fact as leverage. It contained boards that fixed a tax rate in a private contract for twenty years and boards that repriced the rate the moment they sensed they could. These are responses to one industry, operating under one state tax regime, served largely by one regulated utility. The variation is not in the shock. It is in the governance.

This report takes that governance variation as its dependent variable and asks what explains it. The unit of analysis is the local jurisdiction, and the choice is deliberate. The state set the fiscal incentive and the utility built the grid, but the county board approved the rezoning, conditioned the permit, and negotiated, or failed to negotiate, the rate. Where the burdens of the industry concentrate, they concentrate locally: in the census tract that absorbed the land conversion, the residents under the transmission corridor, the water system that hit its permit ceiling, the cemetery in the path of an expansion. The decisions that determined those outcomes were made in county hearing rooms, under procedures and with tools the state had distributed unevenly and, in important respects, inadequately. To understand the distribution of costs, the right place to look is the institution that made the distributive choice.

The case studies this report synthesizes each answer a local question. Read together they answer a statewide one: what determines whether a Virginia community captures the benefits of data center development while containing its costs, or fails to. The answer the cases return is consistent, and it is narrow. The determining factor is the institutional posture the community adopted, and above all when it adopted it, rather than geography or the size of the project. A county acting early, while it still held every instrument of approval and every dollar of forgone revenue as leverage, could set terms the industry met. A county acting late found that its reforms reached only what had not yet been entitled.

SECTION 10: THE FIVE POSTURES

The cases sort onto a spectrum defined by a single variable: the relationship between the timing of local reform and the arrival of the industry. Five postures

recur. They are positions on that spectrum rather than fixed types, and several jurisdictions exhibit more than one as their situation evolves.

Reform-after. The community permits data centers under rules written for ordinary commercial development, accumulates approvals and commitments, and reforms only once the burdens materialize and opposition organizes. The reform is generally real and well drafted. It arrives after the leverage that would have given it force has been spent, so it governs the next project rather than the ones that built the problem. Loudoun is the archetype and Henrico the same posture caught earlier in its arc.

Refusal-before. The community confronts a large project, finds the terms unacceptable, and refuses it outright, frequently before any reform ordinance is in place. Refusal preserves leverage by exercising it, accepting forgone revenue as the price of control. Its limit is that it is reactive and case-by-case: each refusal resets the contest to the same starting line for the next applicant. Hanover, Fauquier, and Pittsylvania occupy this pole.

Contract-lock. The community grants entitlements or, more consequentially, rate commitments embedded in private agreements that bind future boards. Contract-lock trades away the single most valuable instrument a host county holds, the ability to reset the equipment-tax rate at the next assessment cycle, in exchange for a one-time commitment. The trade is effectively irreversible, which distinguishes it from every other posture on the spectrum. Chesterfield and Botetourt are the clearest instances.

Governance-capture. The community becomes fiscally dependent on data center revenue to a degree that disciplines its own politics, softening enforcement and raising the internal cost of refusing the next project. Capture is a risk and a trajectory rather than a discrete event, and its fiscal preconditions are visible well before any formal threshold is crossed. Prince William shows the trajectory and its democratic and judicial correction; Mecklenburg shows the mature condition fifteen years on.

Pre-entitlement-by-ordinance. The community writes demanding rules, noise limits, buffers, overlay boundaries, disclosure requirements, conditional-use triggers, before the first application, and makes entry conditional on meeting them. This posture sets the terms while the county still holds all of its leverage, and across the portfolio it produced the most favorable balance of captured benefit to contained cost. It is also the most demanding to sustain, because it requires a county to regulate a problem it has not yet experienced, and the most fragile,

because procedural carelessness or a grandfathered entitlement can undo it. Louisa, Goochland, Culpeper, and Orange occupy this end.

The spectrum is not a ranking of civic virtue, and reading it as one obscures what it shows. The communities that ended up dictating terms did not necessarily care more about their landscapes or their ratepayers than the communities that did not. They acted earlier, at a point when caring could still be converted into enforceable conditions.

SECTION 11: LEVERAGE AS A DEPRECIATING ASSET

The mechanism beneath the spectrum is simple enough to state in a sentence and consequential enough to organize the entire portfolio. A jurisdiction's bargaining power over a data center developer is at its maximum before the jurisdiction has approved anything, and it decays with each commitment. Every rezoning granted, every by-right entitlement left on the books, every rate fixed in a contract, and every campus grandfathered under an old ordinance converts a unit of future leverage into a present fact that the next decision cannot undo. Reform undertaken late operates only on the residual: the parcels not yet entitled, the rates not yet locked, the applications not yet vested.

Leverage in this setting has a specific source. A developer assembling a hyperscale campus needs things only the county can grant: a rezoning or a use permit, a favorable equipment rate, water and sewer capacity, road and buffer conditions, and the political cover of an approval that will withstand challenge. Before the county grants them, it holds all of them, and the developer's announced investment, its jobs figures, and its willingness to negotiate proffers are all bids for what the county controls. The case studies show the price of entry rising as a county's willingness to grant approval falls: in one refusal-before county the cash component of a developer's proffer package grew more than two-hundredfold over fourteen weeks as approval became less likely. After the county grants what the developer needs, the relationship inverts. The entitlement is vested, the rate is set, the campus is built, and the county's remaining instruments, complaints, enforcement actions, the next assessment cycle, are weaker and slower than the ones it held before it said yes.[20]

This is why two counties facing identical projects, with identical legal authority, produced opposite distributions of cost. One spent its leverage before it understood the price. The other priced the project while it still held everything. It is also why the single irreversible move in the entire repertoire is the contractual rate lock: a board can reverse a zoning posture, lose a lawsuit, or vote out a permissive majority, but it cannot reopen a rate its predecessor wrote into a

binding private agreement. The sections that follow place the studied jurisdictions on this spectrum. The placements are analytical rather than honorific, and the same county can illustrate the strength of one posture and the cost of another.

PART THREE — THE POSTURES, EVIDENCED

SECTION 12: REFORM-AFTER — LOUDOUN AND HENRICO

The reform-after posture has an archetype, and it is the county where the industry began. Loudoun ran the by-right model longer than anywhere else, permitting data centers as ordinary industrial development across more than a decade. The result is a single county that by 2026 accounted for more than 350 operating facilities and a known total above 450, more than the rest of the commonwealth combined, and a general fund that collects on the order of \$800 million a year from the industry. Loudoun is what the unmanaged model produces at scale. It is also the county whose experience every later jurisdiction watched, which is why its trajectory carries as much analytical weight as it does. Reform came to Loudoun the way it comes to the archetype, after the burdens were undeniable and the leverage was gone: a galvanizing transmission fight, a first-ever denial of a major application, and an ordinance overhaul that arrived once the bulk of the buildout was entitled. The county spent a decade unable to say no and now works to contain commitments it can no longer easily unwind.[21]

Henrico is the same posture caught earlier in its arc, and because the case record is fuller it shows the mechanism in more detail. The county's data center base grew on a single 2,270-acre site, the White Oak Technology Park, across three industrial eras: a 1990s semiconductor bet that the county supported with some forty-five million dollars of public infrastructure and that collapsed in the 2009 Qimonda bankruptcy; a hyperscale retrofit beginning in 2010; and a subsea-cable era that, by the early 2020s, made Henrico a landing point for transatlantic fiber and a node carrying a substantial share of East Coast internet traffic. The catalytic fiscal act was a 2017 decision to cut the equipment-tax rate from \$3.50 to \$0.40 per \$100, a roughly ninety percent reduction, which landed a major hyperscaler's campus and set the county's low-rate, high-volume trajectory.[22]

The reform, when it came, was genuine. On June 10, 2025, the board voted unanimously to end by-right data center approval, create a mandatory permit process with design standards, and raise the equipment rate to \$2.60 per \$100, a more than sixfold increase over the 2017 floor. The new standards were substantive: a five-hundred-foot residential setback where the prior rule required two hundred, closed-loop cooling against staff findings that evaporative systems could consume three to five million gallons a day, and generator-testing windows confined to weekday business hours. The limit of the reform is written into the county's own pipeline. A grandfathered build-out of roughly seventeen buildings and about eight million square feet, entitled under the old rules, sits beyond the

reach of the new ones; the land for part of it was assembled and sold to the operator the same day for roughly twice its acquisition price, and the operator subsequently sought permits for several hundred additional diesel generators atop hundreds already approved. Henrico demonstrates that even an attentive county, reforming while the industry is still arriving, governs only what it has not already approved.[23]

The distributional dimension of Henrico is instructive because it shows the politics of reform-after converging from two directions. The historic burden fell on the county's Varina District, a lower-income and substantially Black area that residents described as a sacrifice zone, where an early proposed campus sat across from a Black middle-class neighborhood and within half a mile of an elementary school that was overwhelmingly Black and economically disadvantaged. The reform that finally ended by-right approval, however, was driven into being when an affluent, mostly white community on the other side of the county organized against a campus near its own subdivisions. The two communities arrived independently at the same demand, which is that the county stop approving these facilities without discretion. The lesson the case carries for the spectrum is that reform-after can be propelled by the politics of the burdened and the politics of the comfortable at once, and still arrive too late to govern the eight million square feet already vested. [24]

A vested-rights dispute closed the Henrico record in a way that illustrates the leverage point precisely. A developer who bought a parcel in November 2025, five months after the rules changed, asserted a right to build by-right on the strength of an earlier zoning-confirmation letter; the planning director and the county attorney's office denied the claim, and the Board of Zoning Appeals denied it unanimously in February 2026. The fatal fact was the timing of the purchase: the developer had not acquired the land until after the ordinance changed. The county prevailed because, for that parcel, it had not yet spent its leverage. For the eight million grandfathered square feet, it had.[25]

SECTION 13: REFUSAL-BEFORE — HANOVER, FAUQUIER, AND PITTSYLVANIA

Refusal-before is the posture of the county that exercises its leverage by declining the project, and its clearest recent instance is a county that had never collected a dollar of data center tax. Hanover spent twelve years building a recruitment apparatus: an economic-development zone along its Route 33 corridor, a strategic zoning initiative offering flat fees and deferred studies, a dedicated \$0.45 equipment rate adopted in 2023, and, one month before the decisive application arrived, a small-area plan that named data centers a preferred use for the corridor. The county was, on paper, fully prepared to say yes. It had already approved one

very large project, a 1,211-acre, 2.4-gigawatt campus, on a unanimous vote in March 2024.[26]

What changed the county's posture was the encounter with a second flagship on terms it found unacceptable. The Tract Mountain Road project proposed roughly 427 acres, 900 megawatts, and 2.6 million square feet of building. Two features of the record show refusal operating as a leverage strategy rather than as simple opposition. First, the price of entry rose as approval grew less likely: the cash component of the developer's proffer package grew from roughly \$90,000 in February to approximately \$21 million in May, including a fifteen-million-dollar pump-station and storage commitment, a more than two-hundredfold escalation over fourteen weeks that priced the county's deepening reluctance. Second, the ground of refusal was water, the externality the standard process surfaces late. The county's system carried a total capacity near 24.7 million gallons a day and a peak around 13.5 million, against a project peak demand of two million gallons a day, and the board was weighing it while the system was still recovering from a service crisis the prior year. On May 27, 2026, the board rejected the project on a four-to-three vote. A deciding-bloc supervisor put the reasoning in terms of both the resource and the precedent: the water concern was a valid issue that the proffers did not go far enough to meet, and a gateway approval would send a message about what kind of county Hanover intended to be.[27]

The sequence that followed is the analytically important part. Having refused the project, the county moved to set the price of entry for the queue behind it. In April 2026 the board stripped the \$0.45 rate from its draft budget and advertised a replacement of up to \$3.00 per \$100, with a vote scheduled for late June, repricing the equipment tax before any data center in the county had begun to operate. Hanover refused first and priced second, in that order, and the order is the strategy. It declined the flagship while its discretion was intact, which is legally secure in Virginia because the comprehensive plan is a guide rather than a binding commitment, and then reset the fiscal terms while it still held them. The limit of the posture is the one the framework predicts: refusal is reactive. The county defeated the application in front of it and left the next applicants, a queue that includes the already-approved large campus and other proposals, to be addressed one at a time from the same starting line.[28]

The rural frontier supplies starker refusals that show the posture without Hanover's elaborate fiscal sequel. In Fauquier, a proposed Amazon campus at Warrenton was approved in 2024 and then effectively blocked amid sustained opposition, multiple lawsuits, and an electoral turnover of the council that had approved it; a separate 800-megawatt proposal at Remington was withdrawn in 2025 after the planning commission moved against it. In Pittsylvania, a proposed

mega-campus paired 84 data center buildings with a 3,500-megawatt gas plant that would have been among the largest in the country, and the board defeated it 6-1. These counties looked at the single largest project offered them and declined it outright, before any reform ordinance was on the books, preserving leverage at its maximum by never spending it. Their limitation is structural and worth stating plainly: refusal protects a community at the cost of requiring it to win the fight again every time, with no standing rule to carry the terms forward.[29]

SECTION 14: CONTRACT-LOCK — BOTETOURT AND CHESTERFIELD

Contract-lock is the posture that distinguishes itself by irreversibility, and two cases show it operating through different instruments. Botetourt, a western county in Appalachian Power's territory, fixed the fiscal terms of a Google project in a private performance agreement rather than by ordinance, and the case is unusually legible because it was caught at the formative stage, before grading. The sequence is documented and pointed. Google's site work proceeded under a code name, Project Raspberry, bound by a non-disclosure agreement. A real-estate option was signed on October 1, 2024. On the evening of November 26, 2024, the Tuesday before Thanksgiving, a joint planning-commission and board meeting added "data center" to the relevant zoning district and rezoned the parcel, approving it five to nothing that same night without the option agreement ever being mentioned. The sale closed the following June for roughly fourteen million dollars plus a four-million-dollar payment, through a shell entity, and the operator's identity was not formally confirmed until March 2026.[30]

The agreement does more than approve a use. It caps the operator's effective equipment rate at \$2.40 per \$100 for twenty years per building, an immediate discount off the county's standard rate that is invisible in the published tax code because it lives in a contract rather than an ordinance. It commits the operator to at least a billion dollars and fifty jobs per building across three planned data centers, but a "no obligation to develop" provision makes the headline three-billion-dollar, hundred-fifty-job figures per-building floors that need never be reached, while the four-million-dollar payment is retained even if nothing is built. And it includes two provisions that bear directly on this report's themes: the county undertook to assist the operator in resisting public disclosure of project information, and it ceded to the operator the management of all media and press relations for the project. The four-million-dollar community payment was directed largely to public-safety hardware, including body cameras and less-than-lethal equipment for the sheriff, and not to the corridor communities nearest the site.[31]

The distributional record at Botetourt is the starkest in the western portfolio and the least examined. The Greenfield site was a plantation for two centuries, worked

by enslaved people whose descendants still live in the adjacent community, and the county had already, in 2016, relocated a surviving slave dwelling over a descendant's objection to make room for an earlier industrial tenant. The 2025 and 2026 opposition that did organize was visibly affluent and newcomer, meeting at country-club and high-school venues, while the descendant community appears in none of the accounts. The remaining leverage is downstream and thin: a federal Clean Water Act permit, an expected transmission application, and a regional water authority on which the county holds one of eight seats. The water terms themselves illustrate the late-surprise pattern at its most acute. The operator's demand is set to rise from two million gallons a day toward as much as eight million at buildout, and by one reading the county is exposed to the first hundred million dollars of a new water source whose total cost could reach three times that, moving the region's water-supply horizon forward by two decades. Those figures became public only because a one-person news outlet sued to unseal them, and a circuit court ruled in November 2025, for the first time in Virginia, that a data center's water use is not a trade secret.[32]

Chesterfield reached the same irreversible end through a different mechanism and on a larger fiscal scale. On April 10, 2019, the county adopted a data center equipment rate of \$0.24 per \$100, the lowest in Virginia, a deliberate undercut of Henrico's \$0.40 and a roughly ninety percent reduction from its own prior effective rate. It then recruited Google through a sequence of shell entities and a fusion developer to a set of corridors totaling some two thousand acres. The decisive instrument is not the rate itself but its durability. Under a thirty-year economic-development grant-back, structured so that the development authority refunds the operator the difference if a future board raises the rate, the \$0.24 figure is effectively fixed for three ten-year terms from first occupancy. Against the rates peer jurisdictions were charging by 2026, the lock produces an estimated revenue gap on the order of \$91 million a year measured against Henrico, \$151 million against Loudoun, and \$164 million against Prince William, at full build-out, revenue the county has contracted itself out of collecting. Chesterfield later adopted a conditional-use zoning reform, effective in 2026, but the thirty-year rate was already fixed, and a separately recruited operator that did not receive the grant-back remains fully exposed to rate increases, which measures exactly what the lock is worth to the party that holds it.[33]

The distributional pattern inside Chesterfield compounds the fiscal one along a two-corridor line. The eastern Bermuda Hundred corridor, the county's lowest-income and majority-minority area, received its largest campus by-right, with no public hearing and no disclosure of its water demand, on land beside a documented historic district tied to the slave trade. The affluent western corridor,

by contrast, secured deep buffers, sound caps, closed-loop cooling, and a several-hundred-acre preserve. The clearest exhibit is the gas plant. To serve the load, the SCC approved in November 2025 a 944-megawatt, 1.47-billion-dollar gas peaker, sited in a census tract that is 84 percent people of color and 73 percent low-income, in an area where most surrounding block groups qualify as environmental-justice communities and a federal permit disclosed a cemetery with possible unmarked graves inside the site. An environmental attorney challenging the air permit framed the procedural failure in terms the record supports: the state's Environmental Justice Act is meant to be followed, and in this case even the gesture of following it was not attempted. The peaker and the rate lock together make Chesterfield the portfolio's purest demonstration that a county can contract away both the fiscal upside and the protective conditions, and that a later, more attentive board cannot recover what the earlier one signed.[34]

SECTION 15: GOVERNANCE-CAPTURE — PRINCE WILLIAM AND MECKLENBURG

Governance-capture has a textbook instance and a longitudinal one, and the two together show both the mechanism and its mature outcome. Prince William is the textbook. The county had treated data centers as a targeted industry since the 1990s and had carried a large by-right overlay since 2016, but the case that defines it is the Digital Gateway: a roughly 2,100-acre corridor whose comprehensive-plan amendment passed five to two in November 2022 after a fourteen-hour hearing, and whose rezonings, some 1,760 acres and 22 million square feet, were approved four to three in the early hours of December 13, 2023, after a hearing that ran roughly twenty-seven hours, by a lame-duck board whose composition the next election had already changed.[35]

The capture markers run through the record, and they are specific. A sitting supervisor signed a contract to sell his own land to one of the project's developers on October 25, 2021, ten days before joining the application as a co-applicant; he was required to recuse, resigned at the end of 2022, and moved to a lobbying firm shortly after, a revolving door in a single sequence. The board chair held a substantial position in the parent company of one of the project's data center operators during the proceedings and did not recuse. After the politics turned, a supervisor's political action committee received a \$100,000 contribution from a data-center landowner following a favorable vote, described in local reporting as likely the largest individual contribution to any county supervisor. The county raised the equipment rate repeatedly as revenue grew, from a frozen \$1.25 through a series of increases to \$4.50 per \$100 by 2026, the highest in Northern Virginia, and collected \$293.7 million from the industry in 2024 alone. Fiscal

dependence and procedural shortcutting reinforced each other, which is what capture looks like as a process rather than an event.[36]

The correction, when it came, came from outside the board. A circuit court declared the three rezonings void ab initio in August 2025 on the ground that the county's own public notice had been defective, and the Court of Appeals affirmed unanimously on March 31, 2026, in an opinion warning that the county's reading of the notice rules would invite sandbagging. The county had spent roughly \$1.7 million defending the approvals before it declined to appeal further; one developer withdrew, and a single petition to the Supreme Court of Virginia remained pending. A supervisor who had voted against the project framed the fiscal logic of refusal in terms the outcome vindicated: the first law of digging holes is that when you find yourself in one you stop digging, and the alternative was lengthy, expensive litigation paid for with county tax dollars. The Prince William case is notable precisely because the county is affluent, which establishes that governance-capture is a function of fiscal dependence and procedure rather than of community wealth: the planning protections failed regardless of how well-resourced the affected residents were.[37]

Mecklenburg is the case that makes capture auditable, because it is fifteen years downstream of its first commitment and the rest of the portfolio is not. The county admitted Virginia's first hyperscale campus in 2010, after a decade of plant closures had reduced its bargaining position, by its own description, to near zero. It adopted by-right zoning before the buyers were even named, which guaranteed that no public hearing on whether the build-out should continue would ever occur, and the operator now owns eleven of the county's twelve data center sites across some 3,762 acres. By 2026 data center taxes supplied between 35 and nearly 48 percent of the general fund, and the revenue funded a \$154 million school complex and three elementary schools without borrowing while holding the real-estate rate to thirty-one cents.[38]

The auditable finding is the gap between what such dependence is assumed to deliver and what it delivered. The arrangement was announced to the public as a ninety-percent rebate of the operator's personal property tax; the documented figure is 82.5 percent, and the rebated amount exceeded \$275 million across fiscal years 2019 through 2024 before a 2024 restructuring retired the rebate and created a modest equipment-tax class that let the general fund begin to capture the revenue the public had long been told it was already receiving. The employment record matches the labor model described in PART ONE: roughly seven hundred jobs, operator and vendors combined, in a county of about thirty thousand. The host town shrank from 431 residents in 2010 toward roughly three hundred. The distributional exhibit is not a budget line. During a 2014 expansion,

workers uncovered the graves of a Black tobacco-farming family in the campus path; county officials and operator-funded consultants worked to soften the finding that the cemetery was eligible for the National Register, the designation that would have complicated the expansion, and the thirty-seven graves that were located were excavated and relocated. A county official's contemporaneous reassurance survives in the record: this is not as bad as it sounds, and the graves should be relocatable. There was no organized community left to object, because the family was dispersed and the county government was the project's sponsor. [39]

Mecklenburg is the spending record the prospective cases can only theorize about, and it returns three findings the others assert. Promised revenue and delivered revenue diverge, here by the distance between a ninety-percent claim and an 82.5-percent rebate that ran for years. The divergence persists until something forces an accounting, here a 2024 restructuring rather than any audit. And the costs concentrate where the community has the least capacity to refuse them, here a shrinking, substantially Black, deeply poor town whose dead were moved to make room for cloud capacity. The county fisc is now keyed not to land or labor but to the replacement rhythm of another organization's capital equipment, the mature form of the dependency the prospective counties were only beginning to take on. [40]

SECTION 16: PRE-ENTITLEMENT-BY-ORDINANCE — LOUISA, GOOCHLAND, CULPEPER, AND ORANGE

The posture that produced the most favorable outcomes in the portfolio is also the most demanding, because it requires a county to regulate a problem it has not yet felt, and the four cases here show both its strength and the several ways it fails.

Louisa invented the instrument. In April 2023 the county adopted Virginia's first technology overlay district, roughly 6,400 acres in which data centers were permitted by right under a defined set of conditions, on a six-to-one vote whose lone dissent objected that the noise limits were not strict enough. Within five months the framework drew an eleven-billion-dollar commitment from Amazon for two campuses, and the county set a \$1.25 equipment rate with tiered rebates administered through its development authority. What makes Louisa analytically important is the second move. In August 2024 the county cut roughly two thousand acres from the district and converted every remaining use from by-right to conditional-use permit, restoring the veto point the original instrument had been built to eliminate. The conversion was the leverage restoration, and its effect was tested almost immediately: when Amazon brought a third campus, of some seven

million square feet, before the corrected ordinance in 2025, the project died, the only documented hyperscaler retreat in the portfolio. A later operator that bought a county-assembled tract received a markedly tighter performance agreement than Amazon had, a fifteen-percent rebate capped at fifteen million dollars, which measures how far the board's posture had hardened once it held the conditional-use veto.[41]

Louisa also shows the limits of even an early-acting county's control. The overlay was drawn around transmission capacity and away from protected landscapes, which meant it was drawn toward unprotected ones, placing the by-right entitlement over the homes of residents on rural roads who had no procedural recourse. The reservoir serving the district had a safe yield near 3.2 million gallons a day against a projected average draw approaching that figure from a single operator's two campuses. And the grid externality the county summoned through its approvals reached its residents as ratepayers: the first \$17.099 million in small modular reactor feasibility costs appeared on residential bills statewide for a reactor with no design selected and no federal filing made. A resident's plea at a hearing captured the county's awareness of the stakes: please don't Loudoun Louisa, please don't Prince William Louisa.[42]

Goochland copied Louisa's original by-right design at the stage of Louisa's cycle that Louisa had already moved past, and drew the litigation that tests the posture's edge. On a predicate of a \$0.40 equipment rate adopted in 2019, the county on November 6, 2025, adopted a technology overlay and technology zone covering roughly 4,400 acres along its Route 288 corridor, with data centers by-right in the main district, on a four-to-one vote taken after a hearing that ran past midnight and at which no speaker appeared in support against more than a thousand emails in opposition. The standards were demanding on paper, with setbacks, sound limits, and Tier 4 generators, and the zone offered substantial fee reimbursements. The first application, filed the following June, came from the developer Hanover had rejected two weeks earlier, proposing twelve buildings and three billion dollars of construction. Twenty-eight days after adoption, within the statutory window, four property owners sued, alleging defective public notice, inadequate objective standards, and a version of the ordinance that differed materially from what had been advertised because of floor amendments made the night of the vote. The plaintiffs concentrated on procedure, where courts give the county no deference, and in May 2026 the judge rejected the county's attempt to bury the challenge under some 8,500 pages of record. The demurrer was set for October 2026, by which point the ordinance would have operated unreviewed for roughly eleven and a half months. Goochland demonstrates that pre-entitlement executed with procedural carelessness invites the same after-the-fact correction that befalls

the reform-after counties, even when the substantive posture is the demanding one. It also shows the franchise problem at its sharpest: two supervisors from neighboring Henrico, whose water utility serves the Goochland corridor, testified against an ordinance on which they had no vote, on behalf of residents who would bear effects across a jurisdictional line.[43]

Culpeper is the portfolio's controlled experiment, and it isolates the variable better than any other case. A 2021 consolidation drew a roughly 690-acre technology zone, about one square mile, around the county's existing data infrastructure and made data centers by-right inside it, while keeping the rest of the county discretionary. Inside the box, on the order of twelve to thirteen million square feet and 2,435 megawatts of delivery-point requests accumulated with almost no visible politics, because by-right entry meant no hearings and no hearings meant no contests. Outside the box, on battlefield-adjacent farmland, the same board produced contested four-to-three votes, unanimous denials, and a technology zone repealed outright. Same county, same years, same industry, same board, opposite outcomes, separated only by whether a discretionary vote was required. In September 2025 the county ended by-right approval everywhere else, requiring use permits across thousands of additional acres, but exempted the box, where the projects were already vested. The quiet of a by-right regime is an artifact of the instrument, not evidence of consent, and Culpeper proves it; conflict reappeared wherever the design left a discretionary decision to be made. The county's equipment rate, notably, was never discounted, sitting at \$3.50 per \$100 at the top of the conventional range, which shows that a county can pursue pre-entitlement on land-use terms without competing on price. The town of Culpeper added the sharpest extraction in the portfolio: rather than discount, it secured a minimum-revenue agreement guaranteeing at least \$1.5 million per building per year for fifteen years from an operator, on the order of three hundred million dollars over the term, plus an operator-funded reclaimed-water system, by releasing its municipal utility and letting the dominant utility serve the campuses directly.[44]

Orange occupies the boundary between pre-entitlement and reform-after, and the ambiguity is instructive. Two governments regulated the same industry within weeks. The town removed data centers from its by-right table in February 2026, and the county struck the use from its by-right industrial zoning in April 2026 on a five-to-nothing vote, confining it to a floating technology district, created the prior December, that exists on no particular parcel until one is rezoned into it. The county built the regulated path and then closed the unregulated one, capping any data center outside the district at ten thousand square feet regardless of how it is characterized. The demanding rule, however, could not reach backward. The governing fact in Orange predates every reform: the Wilderness Crossing rezoning,

approved in April 2023, entitled 2,602 acres including some 732 acres of data center, five million square feet, and on the order of 1,500 megawatts, a single project equal to roughly five percent of the entire regional grid's projected peak-load growth through 2030. That entitlement sits outside the new district, and it proceeded toward litigation. A battlefield-preservation group's challenge survived in part, with a court allowing four of seven counts to proceed in September 2025, and a separate public-records suit had already forced the disclosure that ten county officials signed non-disclosure agreements for the benefit of the operator as early as 2022, the only public confirmation of the company's involvement. Orange wrote the demanding rule and still discovered that the largest entitlement on its books predated it. The boundary case confirms the general finding: even pre-entitlement governs only the future, and a county that reforms while a major approval is already vested holds the demanding rule in one hand and the grandfathered project in the other.[45]

PART FOUR — THE DIFFUSION GEOGRAPHY

SECTION 17: THE WAVE

The institutional variation of PART THREE has a geography, and the geography explains much of the variation. The industry spread across Virginia in a discernible wave, and a county's posture correlates strongly with where it sat in that wave and therefore how much warning it had.

The origin is the Northern Virginia core of Loudoun, Prince William, and Fairfax, the most mature data center market in the world. This is where the by-right model ran longest and where the reform-after pattern is most fully developed, because the core had no precedent to learn from. Its defining condition by the mid-2020s was saturation, of land, of power, and of transmission capacity, and saturation is what pushed the industry outward. The first ring out is the I-95 corridor and the Richmond crescent: Stafford, Spotsylvania, and Caroline along the interstate, and Henrico, Chesterfield, Hanover, and Goochland around the capital. These counties absorbed the overflow from the saturated core, and they are where the policy learning is most active, because they had time to watch the core before their own applications arrived. The second ring is the Piedmont frontier of Louisa, Orange, Culpeper, and Fauquier, where the pre-entitlement posture predominates precisely because these counties wrote their rules with the Northern Virginia experience already visible and the first applications still pending. The transmission conflict concentrates here as well, since the Piedmont is the corridor through which the core's power must travel. The far edge is Southside and the Valley: Mecklenburg, Pittsylvania, Botetourt, and the southwestern counties, where very large individual projects arrive one at a time into communities with little prior exposure and high fiscal stakes. The outcomes on the far edge are the most variable in the portfolio, ranging from outright refusal to contract-lock, because each community meets the industry for the first time and improvises its posture in real time.[46]

The wave is not finished, and that is the practical weight of the geography. The disclosed pipeline documented in the appendices is concentrated in the rings and the frontier, not the saturated core. The next decade of Virginia data center policy will be written largely in counties that had no operating facility in 2024, which means the leverage that PART TWO describes is, for much of the commonwealth, still intact and still spendable.

SECTION 18: THE DEVELOPERS AS A SINGLE MARKET

Two features of the diffusion cut against any reading of the cases as isolated local dramas. The first is that the developers treat the corridor as one market while the

jurisdictions experience it as a series of separate decisions. The clearest single instance is the developer that, rejected at Hanover's Mountain Road on water grounds, filed the first application in Goochland's new technology district fourteen days later, the same firm moving the same product to the next jurisdiction the moment one door closed. The same firm had previously walked away from a denial in Chesterfield. Google moved through Chesterfield, Botetourt, and a Chesterfield power-purchase arrangement using a sequence of shell and code-named entities, its identity confirmed only after the entitlements were secured. Amazon appears across the Piedmont and the I-95 ring, often through subsidiaries, and in one Piedmont county its involvement was knowable to the public only through a forced disclosure of officials' non-disclosure agreements. The overlay-district template that Louisa invented was copied by Goochland and others. The jurisdictions experienced the industry as a queue of discrete hearings. The industry experienced the jurisdictions as a single pipeline, and it allocated projects, shells, and announcements accordingly.[47]

The asymmetry matters for the leverage analysis. A county negotiating a single project against a developer that is simultaneously negotiating a dozen has less information about the market than its counterpart, and it is more susceptible to the claim that the investment will simply go elsewhere if the terms are not met. The pre-entitlement counties partly neutralized this by setting standing terms before any specific developer arrived, which is one more reason the posture performed as it did. The reform-after and contract-lock counties, negotiating project by project against a repeat player, were on the weaker side of the information gap.

SECTION 19: THE FALL-LINE NATURAL EXPERIMENT

The second feature of the diffusion is a natural experiment hiding in the fall-line counties around Fredericksburg, and it is worth dwelling on because it lets the analysis separate two instruments that are otherwise confounded. Five jurisdictions, Spotsylvania, Stafford, Caroline, King George, and the City of Fredericksburg, held their data center equipment rate constant at an identical \$1.25 per \$100 under a regional tax compact dating to roughly 2018, a deliberate agreement to prevent the developers from playing the localities against one another on price. The compact held. By 2026 the five had entitled at least 5.4 gigawatts of capacity and roughly 44 million square feet of building, a regional total no governing body had previously assembled, and the rate stayed fixed throughout.[48]

Because the price was held constant while the land-use posture varied, the fall line shows that the rate and the zoning regime are independent levers and that the institutional posture, not the headline rate, carried the distributional result. The

five diverged in exactly the ways the spectrum predicts. Spotsylvania approved more than sixteen million square feet, including an 800-megawatt campus that proceeded by-right and was never voted on, then reversed itself after a 2025 election and required a special-use permit in every district, a reform-after sequence compressed into three years. Stafford permitted by-right from 2023, rejected a tightening in early 2025, then adopted the most stringent setback in Virginia at the time, a 750-foot line, after a citizen petition, and immediately grandfathered all five of its already-approved campuses, the reform reaching nothing it most needed to reach. Caroline built its own zoning district for very large parcels and applied it to an Amazon campus, then closed its general industrial zoning to data centers by special exception only after a competing operator had taken a 900-megawatt campus by-right. King George approved a six-billion-dollar coal-plant conversion in 2023, then swept in a skeptical board that rescinded the performance agreement and moved to downzone, producing vested-rights litigation set for trial in late 2026. The City of Fredericksburg adopted the ring's only by-right overlay in 2025, over a planning-commission denial, and drew a ten-billion-dollar announcement against a city whose entire general fund the project's annual tax could approach.[49]

The fall line also carries two of the portfolio's sharpest distributional and legal markers. One Stafford campus sits on a cemetery holding the remains of at least eighteen enslaved people. And Caroline's reliance on a river withdrawal pitted the county against the Rappahannock Tribe, which appealed the state permit under the Treaty of Middle Plantation of 1677; in June 2026 a circuit court declined to dismiss the treaty and reserved-rights claims, ordering further briefing, a reminder that the water constraint of PART ONE can reach back into seventeenth-century law. The collective lesson of the fall line is that a shared rate compact is itself a form of leverage spent collectively, tested twice and held twice, even as the member electorates turned; and that every land-use tightening the five adopted came after the major entitlements and carried a grandfather clause, so that, as the King George record puts it most plainly, the litigation became the grandfather clause.[50]

PART FIVE — CROSS-CUTTING PATTERNS

Five patterns recur across the portfolio regardless of where a jurisdiction sits on the spectrum. Each is visible in multiple cases, and together they describe the structural features of the model rather than the idiosyncrasies of any one county.

SECTION 20: THE RATE RATCHET AND THE IRREVERSIBILITY OF TRADING IT AWAY

The equipment-tax rate is the competitive instrument, and across the portfolio it ratcheted sharply upward as counties gained experience and leverage. The disclosed range runs from \$0.24 per \$100 in Chesterfield, fixed by contract, through the \$0.40 to \$0.45 rates of counties admitting the industry early, the \$1.25 fall-line compact, the \$2.40 to \$2.60 rates of Botetourt and Henrico, and up to the \$3.50 to \$4.50 rates of Culpeper, Prince William, and the ceilings Hanover and Orange set before entry. The trajectory is a learning curve priced in dollars. The counties that read the curve correctly repriced at each assessment cycle and captured the rising value; Henrico moved from \$0.40 to \$2.60 in eight years, and Prince William from a frozen \$1.25 to \$4.50.[51]

The counties that fixed the rate by private contract removed themselves from the ratchet permanently, and this is the single irreversible move in the entire repertoire. Chesterfield's thirty-year grant-back and Botetourt's twenty-year cap are the two instances, and a later board cannot undo either. A successor can reverse almost anything except a rate its predecessor wrote into a binding contract. The fall-line compact reinforces the point from the other direction: where the rate was held constant by agreement, it could not rise with the market even as entitled capacity multiplied past five gigawatts, so the five jurisdictions left on the table whatever the ratchet would have delivered. The rate is where the irreversibility lives, which is why the framework treats contract-lock as a category distinct from the recoverable mistakes of reform-after.

SECTION 21: WATER AS THE BINDING CONSTRAINT AND THE CONTROLLED SECRET

Across the cases, water displaced electricity as the externality most likely to actually stop a project, and it was also the most tightly withheld. Hanover's refusal turned on water. Botetourt's first hundred-million-dollar water commitment was kept secret until a contempt proceeding forced it out, and the litigation produced what appears to be the first Virginia ruling that a data center's water use is not a trade secret, in a decision observing that there are few resources more precious than water. Chesterfield's largest campus was approved without disclosure of its water demand. Louisa's overlay sat above a reservoir whose safe yield a single operator's draw approached. Orange's build-out ran into a state denial of the very

withdrawal increase it would require. And Caroline's withdrawal drew a tribal treaty challenge that a court refused to dismiss.[52]

The pattern is consistent and it is diagnostic: the data point most capable of changing a local decision is the one operators most consistently decline to disclose, and the disclosure vacuum of PART ONE is at its most acute exactly where the stakes are highest. Water also has a feature electricity lacks, which is that it is locally finite in a way that forces the question back onto the host community rather than diffusing it across a regional grid. A county can be told that its power will come from somewhere on the system; it cannot be told that its reservoir will. That is why water, more than noise or even ratepayer cost, became the externality on which refusal-before counties refused and on which pre-entitlement counties wrote their hardest conditions.

SECTION 22: PROMISED REVENUE AND DELIVERED REVENUE

The prospective cases rest on projected revenue and projected investment, and the one retrospective case shows what those projections are worth. Mecklenburg's rebate ledger, returning 82.5 percent of the operator's personal property tax for years against a public claim of ninety percent, demonstrates that headline revenue figures can overstate what a general fund actually receives by a wide margin and for a long time. The deeper methodological finding is that announced investment is a promotional genre rather than an accounting category. The figure a company announces at a ribbon-cutting is produced for that purpose, is rarely audited by anyone, and frequently bundles speculative future phases with committed present ones; in Mecklenburg the state-verified investment figures ran well ahead of contractual minimums at every checkpoint while the job counts told a thinner story. Every projection the prospective cases cite, the multi-year tax-revenue estimates that persuaded boards to approve, should be read with that genre's conventions in mind, which is precisely what the host counties, eager for the development, generally did not do.[53]

The point is not that any particular projection is dishonest. Announced figures belong to a genre produced for promotion; they are rarely audited; a county that treats them as accounting estimates is making a category error. The retrospective case is the warning the prospective cases cannot supply for themselves, and it is the strongest single argument in the portfolio for treating the revenue side of these deals with the same skepticism that boards routinely apply to the cost side of ordinary capital projects.

SECTION 23: THE GRID EXTERNALITY SUMMONED AND UNGOVERNED

A county approval adds load to a regional grid the county does not run, and the cases show the consequences migrating beyond any local authority and, in the newest instances, beyond the regulator as well. Louisa's approvals helped summon a small modular reactor program whose feasibility costs already sit on ratepayer bills statewide. The transmission fights of the Piedmont counties are the physical externality of approvals granted in the rings. The most striking instance, and the one that points toward the near future, is a grid-scale fusion power-purchase agreement tied to the Chesterfield cluster.[54]

In June 2025 a major technology company signed a 200-megawatt power-purchase agreement, half the output of a planned 400-megawatt fusion plant to be built in Chesterfield, the largest corporate fusion agreement ever signed. The structural significance is not the megawatts; it is that the arrangement is a bilateral private contract that bypasses the utility, the State Corporation Commission, and the ratepayer cost-recovery framework entirely. The traditional pathway, in which the utility builds generation, the SCC approves it, and the costs are spread across all ratepayers, is bypassed at all three points: the technology company contracts directly with an independent generator building on utility-leased land, and it does so as both an equity owner of the developer and the offtaker of its power. A second offtaker, an energy major, took a further tranche valued at more than a billion dollars. The contrast between the two buyers is the analytical core: one is buying a hedge for its own enormous load, the other a merchant resale position, and the deal whose value was announced is the one held by the party that resells power for a living.[55]

The arrangement points toward a future in which the largest users contract directly for dedicated generation, removing both the cost and the oversight from the public system that the rest of this report assumes. The firewall has limits, and they matter for the distributional analysis. Even at full output the plant would cover a fraction of the technology company's Chesterfield load; the remainder runs on the grid under the new GS-5 rate class, and by one estimate roughly sixty percent of the remaining infrastructure cost shifts back onto residential ratepayers after the contract term. The bridge years are the equity problem: the agreements were signed in 2025, the plant cannot deliver before the early 2030s at the earliest, and in between the campuses ramp on grid power priced by capacity auctions that twice cleared at the market cap, with the increase ordered onto residential bills. The fossil bridge, the 944-megawatt gas peaker of SECTION 14, was justified partly by load from the same hyperscaler that bought the fusion output, and its host block group is 84 percent people of color and 73 percent low-

income. Self-supply changes where some megawatts come from. It does not change who underwrites the wires, and it does not retroactively compensate the people who breathed the interim. The county that approves the campus sets all of this in motion and governs none of it.[56]

SECTION 24: GOVERNANCE CAPTURE AND DISCLOSURE FAILURE AS THE FAILURE MODE

Where the model broke down, it broke down in a consistent way: a procedural shortcut or a conflict of interest, paired with a failure of the disclosure systems meant to catch it, corrected after the fact by a court or not at all. Prince William's voided rezoning, its self-dealing supervisor, and its post-correction political-action-committee contribution are the textbook sequence. Botetourt's contractual agreement to help the operator resist disclosure and to cede press control is the same failure written into the deal itself. Goochland's defective notice and night-of-vote amendments are the procedural version, and Orange's forced disclosure of officials' non-disclosure agreements is the version that surfaced only through litigation. These disclosure systems were the mechanisms that, had they functioned, would have surfaced each conflict before the vote, not incidental casualties of the episodes. Their repeated failure, rather than bad luck, is why correction comes late and from outside the board when it comes at all.[57]

The pattern has a structural reading. The disclosure systems failed in the same direction every time, toward the developer and away from the public, because the developer is a repeat player with strong incentives and professional representation, while the disclosure obligations fall on part-time boards and thinly staffed planning offices negotiating their first or second project of this scale. Non-disclosure agreements, code names, and shell entities are standard practice on the developer's side; the public's instruments, public-notice rules and conflict-of-interest provisions, are enforced after the fact and often only by a resident willing to sue. The asymmetry of PART FOUR reappears here as an asymmetry of disclosure, and it is the reason the cleanest corrections in the portfolio came from courts applying procedural rules rather than from the political process catching the conflict in time.

PART SIX — THE STATE FRAME

SECTION 25: HOW POLICY TILTED THE FIELD

The local variation this report documents did not occur on neutral ground. State policy shaped the field every county played on, and it shaped it in one direction. By offering a generous sales-tax exemption that made Virginia attractive to the industry, while withholding from localities the tools needed to manage the consequences, the commonwealth effectively tilted every county toward the development pole. The county was handed the upside of the equipment tax and shielded from the cost of the exemption. The tools to refuse on noise, to demand water disclosure, to require historic and viewshed review, and to allocate grid costs to the users who drive them were either absent or had to be invented locally. A county inclined to manage the industry on terms had to build its own instruments against a sophisticated counterparty, while a county inclined to maximize development could simply accept the state's pre-loaded incentive and approve. The structure did not merely permit the Loudoun outcome. It encouraged it, and the counties that resisted the tilt did so by inventing instruments the state had not provided, which is why the pre-entitlement posture, the one that performed best, was also the rarest.[58]

The unanswered question at the center of the state frame is the but-for question of SECTION 8, and its policy weight is worth restating here. Virginia has never commissioned the study that would measure how much of the industry's investment is attributable to the exemption, and every estimate built on observed behavior, the University of Virginia economist's declining figure near fifty percent, Georgia's econometric thirty percent, the incentives literature's twenty-five percent, sits well below the ninety percent the beneficiaries report on surveys. The exemption is not nothing. Its causal share, however, is almost certainly far below the figure its beneficiaries claim, and the commonwealth has been paying close to two billion dollars a year without ever measuring what it is buying, in the most mature data center market in the world, where the marginal role of any incentive is lowest.

SECTION 26: THE 2026 SESSION AND THE REDISTRIBUTION OF TOOLS

The 2026 legislative session began to redistribute the management tools, which is the clearest sign that the state frame is itself in motion. The General Assembly enacted Tier IV emission standards for new backup generators, a water-use disclosure mandate, mandatory siting and noise assessments, and a cost-allocation measure shifting certain grid costs onto large-load users, though the Governor's

reconvened-session amendments narrowed the last of these. A carbon-conditions bill died. Roughly fifteen data center bills survived the session in all. In late 2025 the State Corporation Commission had already created the GS-5 rate class for the largest users of electricity, an acknowledgment that the old rate structure was not built for this scale of concentrated load.[59]

These measures map directly onto the failures the case studies document. The water-disclosure mandate addresses the controlled secret of SECTION 21 and the litigation it produced in Botetourt. The siting and noise assessments address the late-surprise externalities of SECTION 6. The cost-allocation measure and the GS-5 rate class address the ratepayer exposure of SECTION 4 and the cost-shifting the fusion arrangement of SECTION 23 makes vivid. The state is, in effect, beginning to provide the instruments that the best-managed counties had to invent for themselves, which would make the pre-entitlement posture less a matter of local heroics and more a matter of statewide default. The measures tighten the industry's externalities at the margins, however, and they leave the central subsidy in place.

SECTION 27: THE BUDGET IMPASSE AND THE EXEMPTION'S FUTURE

The exemption itself was handed to the budget negotiators, where as of mid-June 2026 it remained the unresolved core of an impasse that had run since March. The statute carries a sunset of June 30, 2035, and the session produced competing proposals to advance or condition that date: a Senate plan to sunset the exemption as early as 2027, a House plan to preserve it with conditions and a data center accountability commission, and a Governor signaling unwillingness to break signed contracts, which points toward protection for existing certificate holders on the model Georgia used when it repealed its own exemption while grandfathering prior commitments. The analysis in this report does not depend on which way the budget breaks. What the case studies establish holds whether or not the exemption survives: the timing of local reform determined the distribution of cost, the leverage that timing reflects is still intact across much of the commonwealth, and the state frame either continues to tilt the field or begins to level it depending on a single tax decision that the legislature, as of this writing, had not made.[60]

The accountability-commission proposal deserves a note, because it is the institutional form the but-for question may finally take. If the commission is created and charged with the Virginia-specific econometric study that SECTION 8 identifies as missing, the central evidentiary gap in the entire debate would begin to close, and the commonwealth would for the first time have its own measure of what the exemption buys rather than the borrowed estimates and industry surveys it has relied on for fifteen years.

SECTION 28: VIRGINIA IN THE NATIONAL CONTEXT

Virginia is the largest and most mature instance of a problem that legislatures across the country are now addressing rather than an outlier facing a novel one. More than 300 data-center-related bills were filed across more than 30 states in the 2026 sessions, and at least eight states moved to shift data center costs away from residential ratepayers or to condition the industry's tax treatment. A neighboring state's governor courted the industry openly as Virginia debated reform, which is a reminder that the interstate competition the exemption was meant to win is real and ongoing. The national trend, on the evidence, is toward reform, and Virginia's local-variation record is therefore also a preview of the choices those other states are about to make. The commonwealth's counties have already run the experiment the rest of the country is entering, and the result of that experiment is the subject of the implications that follow.[61]

PART SEVEN — IMPLICATIONS

What follows from the evidence is a set of inferences about how this kind of development is governed, offered as findings rather than as a program. The report is descriptive. The implications are what the description entails.

SECTION 29: THE DECISIVE VARIABLE IS TIMING, AND LEVERAGE IS A DEPRECIATING ASSET

The most general implication is that timing is the decisive governance variable. The communities that managed the industry well did not possess unusual virtue or unusual legal authority. They acted while their leverage was intact, before they had approved anything, and they converted that leverage into enforceable terms. Every case in which a county acted late shows the same residue: real reform that governs only the next project, because the projects that created the problem were already entitled. Henrico's eight million grandfathered square feet, Stafford's grandfathered campuses, Orange's Wilderness Crossing, and Loudoun's decade of by-right approvals are the same fact in four counties. For any jurisdiction still ahead of its first serious application, the implication is that the window in which terms can be set is open before the development is wanted most and closes as soon as the first approvals vest. The cost of waiting is paid in specific entitlements that reform can no longer reach, never in the abstract.

SECTION 30: THE ONE IRREVERSIBLE MOVE IS THE CONTRACTUAL RATE LOCK

Most governance mistakes in this domain are recoverable. A permissive board can be voted out, as it was in Spotsylvania and King George. A careless ordinance can be rewritten, as Louisa rewrote its overlay. A lost lawsuit can change a county's posture going forward, as the void-ab-initio rulings changed Prince William's. The exception is the rate fixed by private contract. Chesterfield's thirty-year lock and Botetourt's twenty-year cap are the two moves in the entire portfolio that a later board cannot undo, because the leverage was contracted away rather than merely spent. The implication for any county tempted to embed a fiscal term in a performance agreement is that it is trading a recoverable decision for an unrecoverable one, and the cases suggest the trade is rarely worth what the county receives for it, because the same operator that demands the lock would, on the evidence of the rate ratchet, have come anyway.

SECTION 31: ANNOUNCED FIGURES ARE A GENRE, NOT AN ACCOUNTING

The single auditable case shows that announced investment figures and projected revenue figures systematically overstate what a community actually receives, and

that the overstatement persists for years before anyone checks. The argument is not that any particular projection is dishonest. Announced figures belong to a genre produced for promotion; they are rarely audited; a county that treats them as accounting estimates is making a category error. The implication is that the revenue side of these deals warrants the same skepticism boards routinely apply to the cost side of ordinary capital projects, and that a multi-year tax-revenue projection offered in support of an approval should be discounted by the conventions of the genre that produced it. Mecklenburg is the retrospective check the prospective cases cannot provide for themselves, and its lesson is that the gap between the brochure and the ledger is real, large, and durable.

SECTION 32: LOCAL OUTCOMES ARE DOWNSTREAM OF STATE DESIGN

The central tendency of the whole portfolio, the tilt toward maximum development, is better explained by the state policy frame than by any failure of local will. The commonwealth offered the incentive, withheld the management tools, and left each county to negotiate alone. Counties that resisted the tilt did so by inventing instruments the state had not provided. The implication is that local-variation outcomes are downstream of state design choices, and that the distribution of governance tools, not merely the distribution of the subsidy, is what determined how much room each county had to maneuver. A state that wants the managed middle to be the default rather than the exception would distribute the tools the best-managed counties built, which is precisely what the 2026 session began, hesitantly, to do.

SECTION 33: THE PUBLIC RECORD UNDERSTATES WHAT THE INDUSTRY COSTS

Because Virginia does not require facility-level disclosure of power, water, or investment, every public figure on the scale of the industry is a floor, and the cost side of the ledger is more obscured than the benefit side. A benefit announces itself at a ribbon-cutting. A cost, a water draw, a transmission route, a ratepayer increase, surfaces later and partially. The implication is that the public record systematically understates what the industry consumes and what it costs, and that any analysis built on that record, including this one, describes a lower bound rather than a measured total. The first court ruling that a data center's water use is not a trade secret is significant beyond its facts precisely because it begins to convert a controlled secret into a public number, and the value of the 2026 disclosure mandate lies in the same conversion.

SECTION 34: THE POSTURE THAT WORKED IS THE HARDEST TO SUSTAIN

The final implication is the one the spectrum itself yields. The pre-entitlement posture outperformed the others on the balance of captured benefit to contained cost, and it did so consistently. It is also the hardest to sustain, because it asks a county to regulate a problem before experiencing it, and the easiest to undermine, through the procedural carelessness that exposed Goochland and the grandfathering that limited Orange and Henrico. The implication is not a formula any county can simply adopt. The posture that worked is also the most demanding to execute and the most fragile in practice, which helps explain why so few jurisdictions reached it and why the state frame, by leaving each county to build the instruments alone, made it rarer than the evidence on its performance would otherwise predict. A county that wants to occupy that posture has to do three hard things at once: write demanding rules before it has a project to react to, execute the adoption with procedural care a court will respect, and decline to grandfather the entitlements that would hollow the rules out. The cases show all three being done well only rarely, and never without cost.

PART EIGHT — CONCLUSION

Virginia ran an unintended natural experiment. It exposed more than two dozen local governments to the same industry and the same state subsidy, served largely by the same utility, within roughly eight years, and the governments responded in measurably different ways. The variation was not random and it was not principally geographic. It tracked a single variable, the timing of institutional reform relative to the industry's arrival, and behind that variable a deeper one, the quantity of bargaining leverage a community still held when it chose how to act.

The spectrum that results, from reform-after through refusal-before, contract-lock, and governance-capture, to pre-entitlement-by-ordinance, is a map of leverage spent and leverage held. Loudoun marks the pole of maximum development and maximum dependence, reform arriving only after the leverage was gone. The rural refusals of Hanover, Fauquier, and Pittsylvania mark the opposite pole, leverage preserved by exercising it and revenue forgone as the price of control. Most of Virginia now sits in the contested middle, the space of the overlay district, the conditional-use regime, the negotiated buffer, and the rate set before entry, where counties attempt to capture the benefit without the dependence. The middle is where the policy learning is concentrated, and it is where the state's slow redistribution of management tools will land hardest.

The single auditable case grounds the whole analysis. Fifteen years downstream, the mature condition of the unmanaged model is visible in one county: a general fund dependent on another organization's equipment-refresh cycle, more than \$275 million in tax rebated back to the operator before the public received what it had been promised, a host town that lost a third of its population, and a Black family's graves relocated to make room for cloud capacity. The prospective cases describe risks. The retrospective case describes what the risks become.

The wave is not finished, and that is the practical weight of the finding. The disclosed pipeline sits in the counties that had no operating facility in 2024, which means the decisions that will determine the next decade's distribution of costs are still ahead, in hearing rooms where the leverage is, for now, still intact. This report offers those rooms no recommendation. It offers them the record of what the leverage was worth to the communities that kept it, and what it cost the communities that let it go.

APPENDICES

APPENDIX A: METHOD AND THE DISCLOSURE VACUUM

This report synthesizes thirteen jurisdiction-level case studies and one statewide facility inventory, each built from primary local records, utility and regulatory filings, company disclosures, court records, and sustained local reporting. The inventory is a master facility database of 286 records spanning at least twenty-four Virginia counties and independent cities, classified by status into operating, pipeline (under construction, approved, announced, proposed, and related pre-operational categories), and a separate register of canceled, rejected, and withdrawn projects. It is current to March 2026 with the corrections noted at the end of this appendix. The case studies are cited individually where their specific findings are used; the synthesis does not reproduce them.

Two methodological points govern how the inventory and every aggregate drawn from it should be read.

First, the blank cells are findings, not omissions. Of the 286 facility records, 191 carry no disclosed power figure, 258 carry no disclosed water figure, and 254 carry no disclosed investment figure. These gaps are the disclosure vacuum described in PART ONE. Virginia does not require operators to publish facility-level power, water, or investment data, and most do not. The consequence is that every capacity and investment total in this report is a floor, higher than the disclosed figure by an unknown margin, and the margin is itself part of the finding. The 2026 water-reporting mandate is the first statutory step toward closing any part of the gap, and it reaches only water.

Second, the aggregate capacity figures must be read with the vacuum in view. Among records reporting a power figure, the operating fleet totals on the order of 3,100 megawatts and the disclosed pipeline totals on the order of 21,700 megawatts, roughly seven times the operating base. Because 191 records report no power figure at all, both numbers understate, and the operating figure, drawn disproportionately from older facilities predating current disclosure norms, understates more severely. The safe statement is directional: the disclosed pipeline is several times larger than the operating fleet, and the order of magnitude matters more than the precise multiple.

A note on attribution conventions. Local officials are identified by role rather than personal name, to keep the analysis focused on institutional behavior; the companion case studies carry the named record, including the elected officials, developers, and attorneys named on the public record. Courts and their published

decisions are cited in the ordinary way. Analytical lenses are identified by the type of work they perform, for example the utility finance framework, the institutional behavior framework, the distributional justice framework, the energy-and-labor framework, and the energy-geography framework, rather than by the names of the researchers who developed them. External published researchers and institutions whose work is cited as evidence are named in the ordinary way.

Corrections applied since the March 2026 compilation, and reflected in the narrative, include the following. The Tract Mountain Road project in Hanover, a 430-acre proposal distinct from the larger Tract campus under construction near Ashland, was rejected on May 27, 2026, on a four-to-three vote, and is moved to the canceled-rejected register; the underlying spreadsheet predates that vote. The Prince William Digital Gateway remains in legal limbo: the Court of Appeals affirmed the rezoning void ab initio on March 31, 2026, the county and one developer withdrew from the appeal in April, and a lone remaining petition to the Supreme Court of Virginia was pending.

APPENDIX B: THE INSTITUTIONAL SPECTRUM — JURISDICTION CLASSIFICATION

The table positions each studied jurisdiction on the leverage-over-time spectrum of PART TWO. The “dominant posture” is the one that best characterizes the jurisdiction’s response; several exhibit secondary postures noted in the narrative. The “reversibility” column records whether a later board could, in principle, undo the defining choice.

Jurisdiction	Region	Dominant posture	Defining evidence	Reversible by a later board?
Loudoun	Northern Virginia	Reform-after	Decade of by-right; 450+ known facilities; ~\$800M/yr; ordinance overhaul after first denial	Partly; major commitments locked
Henrico	Richmond Metro	Reform-after	Mid-stream rate rise \$0.40 → \$2.60; ~8M SF / ~17 QTS buildings grandfathered	Future projects only
Hanover	Richmond Metro	Refusal-before	Mountain Road rejected 4-3, May 27, 2026 on water; rate reset \$0.45 → up to	Yes; leverage held

Jurisdiction	Region	Dominant posture	Defining evidence	Reversible by a later board?
			\$3.00 before entry	
Fauquier	Piedmont	Refusal-before	Amazon Warrenton blocked; Remington 800 MW withdrawn	Yes
Pittsylvania	Southside	Refusal-before	Mega-campus (84 DC + 3,500 MW gas) defeated 6-1	Yes
Botetourt	Roanoke area	Contract-lock	\$2.40/\$100 cap for 20 yrs in performance agreement; ordinance edited Nov 26, 2024 after Oct 1 option	No; signed away
Chesterfield	Richmond Metro	Contract-lock	\$0.24/\$100 grant-back lock for 30 yrs; est. \$91-164M/yr gap	No; signed away
Prince William	Northern Virginia	Governance-capture	Digital Gateway void ab initio (Mar 31, 2026); \$293.7M collected 2024; \$4.50 rate	Court-corrected, late
Mecklenburg	Southern VA	Governance-capture (mature)	35-48% of general fund; 82.5% tax rebated, >\$275M FY2019-24, until 2024 restructuring	Partly; rebate retired 2024
Louisa	Piedmont	Pre-entitlement	First VA technology overlay (Apr 2023); \$11B AWS; converted to conditional-use Aug 2024	Strong posture
Goochland	Central VA	Pre-entitlement	~4,400 ac pre-entitled by ordinance Nov 6, 2025; sued on notice; defended	Strong posture; procedural risk

Jurisdiction	Region	Dominant posture	Defining evidence	Reversible by a later board?
			May 26, 2026	
Culpeper	Piedmont	Pre-entitlement (geographic)	~690-ac by-right box; frictionless inside, contested votes outside	Strong posture
Orange	Piedmont	Pre-entitlement / reform-after hybrid	Conditional technology district 2026; 2,602-ac Wilderness Crossing grandfathered	Future projects only
Fredericksburg ring (Stafford, Spotsylvania, Caroline, King George, Fredericksburg)	I-95 / fall line	Mixed land-use, shared rate	Identical \$1.25/\$100 compact since ~2018; ≥5.4 GW / ~44M SF entitled	Rate fixed by compact

APPENDIX C: SUMMARY BY COUNTY AND REGION

Counts below were compiled March 2026 and carry the disclosure caveats of Appendix A. “Total Known” includes operating, pipeline, and, where noted, large multi-building campuses counted as single entries. The Loudoun line is the one to hold against the statewide totals: a single county accounts for more operating facilities than the rest of the commonwealth combined.

County / City	Region	Operating	Under Construction	Proposed	Withdrawn/ Rejected	Total Known
Loudoun	Northern Virginia	350+	66+	Dozens	0	450+
Fairfax	Northern Virginia	50+	Several	Limited	0	65+
Prince William	Northern Virginia	90+	Several	Digital Gateway + 1,930 ac	2	120+
Stafford	I-95 Corridor	0	3 (7M+ SF)	18 in pipeline	0	18+
Spotsylvania	I-95 Corridor	0	1 (PH 95, 800 MW)	Several (AWS)	0	Several
Caroline	I-95 Corridor	0	2 (CleanArc, AWS)	1 (AVAIO)	0	3+
Culpeper	Piedmont	2	0	1+ (CloudHQ)	0	3+
Fauquier	Piedmont	0	0	1 (GI)	3	4

County / City	Region	Operating	Under Construction	Proposed	Withdrawn/ Rejected	Total Known
				Partners)		
Orange	Piedmont	0	0	1	0	1
Louisa	Piedmont	0	0	2 (EdgeCore 1.1 GW; SMR)	1 (AWS)	3
Goochland	Central VA	0	0	Zoning approved	0	TBD
Henrico	Richmond Metro	16+	2+ (QTS, Iron Mtn)	1 (DC BLOX)	2	20+
Chesterfield	Richmond Metro	0-1	2 (Google, Chirisa)	3+	1 (Tract)	6+
Hanover	Richmond Metro	2	0	1 (Tract 2.4 GW)	2	5
Mecklenburg	Southern VA	1 (MSFT, 1.1M SF)	2+	1 (LYH03)	0	4+
Pittsylvania	Southside	0	0	1 (Anchorstone)	1 (Balico)	2
Appomattox	Southside	0	0	1 (AVAIO)	0	1
Virginia Beach	Hampton Roads	2 (Globalinx, Telxius)	1 (CLS expansion)	3	0	6
Charles City	East of Richmond	0	0	0	1 (withdrawn)	0
King George	Fredericksburg	0	0	Proposed	0	TBD
Surry	Southside	0	0	Proposed	0	TBD
Wise	Southwest VA	1 (Mineral Gap)	0	0	0	1
Scott	Southwest VA	1 (OnePartner)	0	0	0	1
Botetourt	Roanoke area	0	0	1 (Google \$3B)	0	1

APPENDIX D: MASTER FACILITY INVENTORY

The complete facility-level inventory follows. It carries the disclosure caveats of Appendix A: blank power, water, and investment fields denote undisclosed data, not absent facilities. In the Word edition this table is rendered in a landscape section with a repeating header row.

#	Facility	County	Status	Owner/ Operator	Type	Size (SF)	Power (MW)	Yr	Investment (\$)
1	Equinix DC1	Loudoun	OPERATING	Equinix (EQIX)	Retail Colocation	43,346		Pre-2010	
2	Equinix DC2	Loudoun	OPERATING	Equinix	Retail Colocation				

#	Facility	County	Status	Owner/ Operator	Type	Size (SF)	Power (MW)	Yr	Investment (\$)
3	Equinix DC3	Loudoun	OPERATING	Equinix	Retail Colocation				
4	Equinix DC4	Loudoun	OPERATING	Equinix	Retail Colocation	99,969	6		
5	Equinix DC5	Loudoun	OPERATING	Equinix	Retail Colocation				
6	Equinix DC6	Loudoun	OPERATING	Equinix	Retail Colocation				
7	Equinix DC10	Loudoun	OPERATING	Equinix	Enterprise Colocation				
8	Equinix DC11	Loudoun	OPERATING	Equinix	Retail Colocation				
9	Equinix DC12	Loudoun	OPERATING	Equinix	Retail Colocation	57,800		2017	
10	Equinix DC13 (DA13)	Loudoun	OPERATING	Equinix	Wholesale				
11	Equinix DC15	Loudoun	OPERATING	Equinix	Wholesale				
12	Equinix DC16	Loudoun	OPERATING	Equinix	Wholesale				
13	Equinix DC21	Loudoun	OPERATING	Equinix	Hyperscale				
14	Equinix DC22	Loudoun	OPERATING	Equinix	Hyperscale				
15	Digital Realty ACC4	Loudoun	OPERATING	Digital Realty (DLR)	Wholesale	1,057,000	10		
16	Digital Realty ACC5	Loudoun	OPERATING	Digital Realty	Wholesale	348,000	36.4		
17	Digital Realty ACC6	Loudoun	OPERATING	Digital Realty	Wholesale	222,300	26		
18	Digital Realty ACC7	Loudoun	OPERATING	Digital Realty	Wholesale	446,000	41.6		
19	Digital Realty ACC9	Loudoun	OPERATING	Digital Realty	Wholesale				
20	Digital Realty Digital Dulles	Loudoun	UNDER CONSTRUCTION	Digital Realty	Hyperscale	7,500,000			
21	CloudHQ LC1-LC3 Campus	Loudoun	OPERATING	CloudHQ	Hyperscale	2,400,000 +	320+		
22	CloudHQ LC4	Loudoun	UNDER CONSTRUCTION	CloudHQ	Hyperscale	1,580,560	180	Expected 2024-25	
23	CyrusOne ABX-1	Loudoun	OPERATING	CyrusOne (KKR/GIP)	Wholesale	265,000			\$154.1M acquisition
24	CyrusOne NVA9	Loudoun	OPERATING	CyrusOne	Wholesale	700,000	135		
25	CyrusOne NVA1/NV A2/NVA3	Loudoun	OPERATING	CyrusOne	Enterprise Colocation	420,000	48		
26	DataBank Ashburn	Loudoun	UNDER CONSTRUCTION	DataBank	Retail Colocation		20	Expected 2026	

#	Facility	County	Status	Owner/ Operator	Type	Size (SF)	Power (MW)	Yr	Investment (\$)
27	Yondr Arcola	Loudoun	UNDER CONSTRUCTION	Yondr Group	Hyperscale		48		
28	Compass Leesburg	Loudoun	UNDER CONSTRUCTION	Compass Datacenters	Hyperscale				
29	STACK Ashburn Hyperscale	Loudoun	PROPOSED	STACK Infrastructure	Hyperscale	1,310,000	144	Construction 2026	
30	STACK Leesburg (NVA-06)	Loudoun	UNDER CONSTRUCTION	STACK Infrastructure	Hyperscale		72		
31	PowerHouse Beaumead/AOL HQ	Loudoun	UNDER CONSTRUCTION	PowerHouse DC (AREP/Harrison Street)	Hyperscale	1,200,000			\$1B plan (6 DCs)
32	CoreSite VA1	Fairfax	OPERATING	CoreSite (AIC)	Retail Colocation				
33	CoreSite VA2	Fairfax	OPERATING	CoreSite	Retail Colocation				
34	CoreSite VA3	Fairfax	UNDER CONSTRUCTION	CoreSite	Retail Colocation				
35	Equinix (former MAE-East)	Fairfax	OPERATING	Equinix	Internet Exchange			1990s	
36	Equinix DC14	Prince William	OPERATING	Equinix	Wholesale				
37	Iron Mountain Manassas	Prince William	OPERATING	Iron Mountain (IRM)	Wholesale				
38	Google Prince William DC	Prince William	OPERATING	Google	Hyperscale				\$9B total VA
39	Corscale Gainesville Crossing	Prince William	UNDER CONSTRUCTION	Corscale	Hyperscale		325 (campus)		
40	PW Digital Gateway	Prince William	LEGAL LIMBO	Compass/QTS	Hyperscale	22,000,000+			\$400-500M/yr tax
41	Gainesville 1,930-acre Proposal	Prince William	PROPOSED	Undisclosed	Industrial/DC				
42	PWC 40-acre DC (denied)	Prince William	REJECTED	Undisclosed	Data Center				
43	Vantage Stafford Campus	Stafford	UNDER CONSTRUCTION	Vantage Data Centers	Hyperscale	929,000		First bldg 2027	\$2.2B
44	STACK Stafford Technology Campus	Stafford	PROPOSED	STACK Infrastructure	Hyperscale		1,800	First phase 2027	\$302.3M land
45	Stafford Pipeline (15+ addtl)	Stafford	PROPOSED	Various	Various				
46	PowerHouse 95 (PH)	Spotsylvania	UNDER CONSTRUCTION	PowerHouse DC	Hyperscale	3,500,000	800	150 MW by Oct	

#	Facility	County	Status	Owner/ Operator	Type	Size (SF)	Power (MW)	Yr	Investment (\$)
	95)		CTION	(AREP/Harrison Street)				2025	
47	CleanArc VA1	Caroline	UNDER CONSTRUCTION	CleanArc Data Centers	Hyperscale		900	Phase 1: 1Q 2027	\$3B+ (\$8.8B completion)
48	AVAIO Ladysmith Campus	Caroline	PROPOSED	AVAIO Capital	Hyperscale				
49	AWS Spotsylvania/Caroline/Stafford	Caroline/Spotsylvania/Stafford	UNDER CONSTRUCTION	Amazon (AWS)	Hyperscale				\$6B (of \$35B)
50	King George Proposals	King George	PROPOSED	Various					
51	Equinix (former Terremark)	Culpeper	OPERATING	Equinix	Colocation				
52	Swift Data Center	Culpeper	OPERATING	Swift	Enterprise				
53	CloudHQ Culpeper	Culpeper	PROPOSED	CloudHQ	Hyperscale				
54	Gigaland Campus	Fauquier	WITHDRAWN	Gigaland LLC	Hyperscale/Colo		800		\$4M land (Oct 2023)
55	Headwaters Catlett Station	Fauquier	WITHDRAWN	Headwaters Site Development	Data Center				\$400M
56	Amazon Warrenton Campus	Fauquier	BLOCKED	Amazon (AWS)	Hyperscale	220,000			\$39M land
57	GI Partners Vint Hill	Fauquier	DELAYED	GI Partners	Data Center				
58	Wilderness Crossing DC	Orange	PROPOSED	TBD	Data Center				
59	EdgeCore Louisa Campus	Louisa	ANNOUNCED	EdgeCore Digital Infrastructure	Hyperscale	3,900,000	1,100		\$42M
60	AWS Louisa County	Louisa	WITHDRAWN	Amazon (AWS)	Hyperscale	1,700,000			
61	AWS/ Dominion SMR (North Anna)	Louisa	PROPOSED	AWS/ Dominion Energy	Nuclear-powered DC				
62	Goochland Tech Overlay District	Goochland	APPROVED ZONING	Various potential	Various				
63	QTS Richmond 1 (NAP)	Henrico	OPERATING	QTS (Blackstone)	Mega/Hyperscale	1,400,000 +		2010	
64	QTS Richmond Expansion	Henrico	UNDER CONSTRUCTION	QTS (Blackstone)	Hyperscale				

#	Facility	County	Status	Owner/ Operator	Type	Size (SF)	Power (MW)	Yr	Investment (\$)
65	Meta Henrico Data Center	Henrico	OPERATING	Meta Platforms (META)	Hyperscale	2,500,000		~2021	\$1B+
66	Iron Mountain RCH-1 to RCH-4	Henrico	UNDER CONSTRUCTION	Iron Mountain (IRM)	Wholesale		200 (campus)		
67	DC BLOX Henrico (revised)	Henrico	PROPOSED	DC BLOX Inc.	Colocation	65,000			
68	DE-CIX Richmond (Henrico x2)	Henrico	OPERATING	DE-CIX	Internet Exchange				
69	Google Chesterfield (Project Peanut)	Chesterfield	UNDER CONSTRUCTION	Google (GOOGL)	Hyperscale			18-24 months	\$9B total VA
70	Google Watkins Centre South	Chesterfield	PROPOSED	Google	Hyperscale				
71	Google Upper Magnolia Green	Chesterfield	LAND ACQUIRED	Google	Hyperscale				
72	Chirisa Digital Drive DC1	Chesterfield	APPROVED	Chirisa/ AREP (CoreWeave)	Hyperscale	380,000	1,000 (campus)		\$2B
73	Chirisa Digital Drive DC2	Chesterfield	APPROVED	Chirisa/ AREP (CoreWeave)	Hyperscale	380,000			
74	Tract Chesterfield (744 acres)	Chesterfield	WITHDRAWN	Tract (Denver)	Hyperscale				
75	Pixel Factory Data Center	Hanover	OPERATING	Pixel Factory (Scott Brown)	Colocation / Enterprise				
76	DE-CIX Richmond (Hanover)	Hanover	OPERATING	DE-CIX	Internet Exchange				
77	WestDulles Tech Park	Hanover	REJECTED	WestDulles Properties	Tech Park/DC				
78	HHHunt Hanover Campus	Hanover	WITHDRAWN	HHHunt	Hyperscale	3,300,000			
79	Tract Hanover Technology Park	Hanover	PROPOSED	Tract	Hyperscale		2,400		
80	Microsoft BN Campus (Boydton)	Mecklenburg	OPERATING	Microsoft (MSFT)	Hyperscale/Cloud	1,100,000	250+	2010	\$2B+
81	Microsoft Ridge/Prison/Hillcrest	Mecklenburg	UNDER DEVELOPMENT	Microsoft	Hyperscale				

#	Facility	County	Status	Owner/ Operator	Type	Size (SF)	Power (MW)	Yr	Investment (\$)
	st								
82	Microsoft LYH03 (Bailey)	Mecklenburg	PROPOSED	Microsoft	Hyperscale				
83	Anchorstone Advisors DC	Pittsylvania	APPROVED	Anchorstone Advisors LLC	Hyperscale				
84	Balico MegaCampus	Pittsylvania	DEFEATED	Balico LLC (NoVA)	84 DCs + Gas Plant		3,500 (gas plant)		
85	AVAIO Appomattox Campus	Appomattox	PROPOSED	AVAIO Capital	Hyperscale				
86	Globalinx Data Center & CLS	Virginia Beach	OPERATING	Globalinx Data Centers	Cable Landing/Carrier-Neutral Colo	10,750		~2019	\$39M expansion
87	Telxius Cable Landing Station	Virginia Beach	OPERATING	Telxius (Telefonica)	Cable Landing Station	20,000			
88	ACA International DC	Virginia Beach	PROPOSED	ACA International	Colocation /Cable Landing	130,000			
89	PointOne Virginia Beach	Virginia Beach	PROPOSED	PointOne	Computing DC/Cable Landing	62,000			\$80M
90	Surry County Proposals	Surry	PROPOSED	Various					
91	Charles City County DC	Charles City	WITHDRAWN	Kansas-based (unnamed)	Data Center				
92	Prince George/Petersburg	Prince George	PROPOSED	Various	Various				
93	Fredericksburg Area Projects	Fredericksburg City	REJECTED	Various	Various				
94	Commonwealth Technical Svc	Richmond City	OPERATING	Commonwealth Technical Services	Colocation				
95	Equinix Federal/Classified	Various	OPERATING	Equinix Federal	Government/Classified				
96	AWS IAD1	Fairfax	OPERATING	Amazon (AWS)	Hyperscale/Cloud		5	2006	
97	AWS IAD9	Fairfax	OPERATING	Amazon (AWS)	Hyperscale/Cloud				
98	AWS IAD22	Fairfax	OPERATING	Amazon (AWS)	Hyperscale/Cloud				
99	AWS IAD10	Loudoun	OPERATING	Amazon (AWS)	Hyperscale/Cloud	126,869			
100	AWS IAD12	Loudoun	OPERATING	Amazon (AWS)	Hyperscale/Cloud				
101	AWS IAD15	Loudoun	OPERATING	Amazon (AWS)	Hyperscale/Cloud				

#	Facility	County	Status	Owner/ Operator	Type	Size (SF)	Power (MW)	Yr	Investment (\$)
102	AWS IAD23	Loudoun	OPERATING	Amazon (AWS)	Hyperscale/Cloud				
103	AWS IAD50	Loudoun	OPERATING	Amazon (AWS)	Hyperscale/Cloud				
104	AWS IAD60	Loudoun	OPERATING	Amazon (AWS)	Hyperscale/Cloud	109,997			
105	AWS IAD71	Loudoun	OPERATING	Amazon (AWS)	Hyperscale/Cloud				
106	AWS IAD11	Prince William	OPERATING	Amazon (AWS)	Hyperscale/Cloud				
107	AWS IAD24	Prince William	OPERATING	Amazon (AWS)	Hyperscale/Cloud				
108	AWS IAD55	Prince William	OPERATING	Amazon (AWS)	Hyperscale/Cloud				
109	AWS IAD59	Prince William	OPERATING	Amazon (AWS)	Hyperscale/Cloud				
110	AWS IAD73	Prince William	OPERATING	Amazon (AWS)	Hyperscale/Cloud	146,962			
111	AWS IAD100 Tanner Way	Prince William	OPERATING	Amazon (AWS)	Hyperscale/Cloud				
112	AWS IAD-104	Prince William	OPERATING	Amazon (AWS)	Hyperscale/Cloud				
113	AWS IAD-105	Prince William	OPERATING	Amazon (AWS)	Hyperscale/Cloud		50		
114	AWS IAD-106	Prince William	OPERATING	Amazon (AWS)	Hyperscale/Cloud		50		
115	AWS 11200 Thomasson Barn	Prince William	OPERATING	Amazon (AWS)	Hyperscale/Cloud				
116	AWS 45305 Sterling	Loudoun	OPERATING	Amazon (AWS)	Hyperscale/Cloud				
117	AWS 20945 Loudoun County Pkwy	Loudoun	OPERATING	Amazon (AWS)	Hyperscale/Cloud				
118	AWS 20935 Loudoun County Pkwy	Loudoun	OPERATING	Amazon (AWS)	Hyperscale/Cloud				
119	AWS 25410 Sutton Bay	Loudoun	OPERATING	Amazon (AWS)	Hyperscale/Cloud				
120	AWS Fadeley II	Loudoun	OPERATING	Amazon (AWS)	Hyperscale/Cloud	180,000	32		
121	AWS 13600 EDS Drive	Fairfax	OPERATING	Amazon (AWS)	Hyperscale/Cloud				
122	AWS 22420 Kipper	Loudoun	OPERATING	Amazon (AWS)	Hyperscale/Cloud				
123	AWS Erin's Run Campus	Loudoun	OPERATING	Amazon (AWS)	Hyperscale/Cloud				
124	AWS Vulcan	Prince William	UNDER CONSTRUCTION	Amazon (AWS)	Hyperscale/Cloud				\$152M land

#	Facility	County	Status	Owner/ Operator	Type	Size (SF)	Power (MW)	Yr	Investment (\$)
	Lane Campus		CTION						
125	AWS IAD7	Prince William	OPERATING	Amazon (AWS)	Hyperscale/Cloud				
126	AWS Cosner Tech Campus	Stafford	UNDER CONSTRUCTION	Amazon (AWS)	Hyperscale/Cloud		60		
127	AWS King George Campus	King George	PROPOSED	Amazon (AWS)	Hyperscale/Cloud	7,250,000			
128	Digital Realty IAD24	Loudoun	OPERATING	Digital Realty	Wholesale				
129	Digital Realty IAD35	Loudoun	OPERATING	Digital Realty	Wholesale	392,800			
130	Digital Realty IAD36	Loudoun	OPERATING	Digital Realty	Wholesale				
131	Digital Realty IAD37	Loudoun	OPERATING	Digital Realty	Wholesale	392,711	44		
132	Digital Realty IAD38	Loudoun	OPERATING	Digital Realty	Wholesale				
133	Digital Realty IAD40	Loudoun	OPERATING	Digital Realty	Wholesale	223,200			
134	Digital Realty IAD44	Loudoun	OPERATING	Digital Realty	Wholesale	794,000	96		
135	Digital Realty IAD56	Loudoun	UNDER CONSTRUCTION	Digital Realty	Hyperscale		20		
136	Digital Realty VA3	Fairfax	OPERATING	Digital Realty	Wholesale	256,000			
137	Digital Realty Sterling	Loudoun	UNDER CONSTRUCTION	Digital Realty	Hyperscale		20		
138	Digital Realty Manassas	Prince William	PROPOSED	Digital Realty	Hyperscale				
139	NTT/RagingWire VA1	Loudoun	OPERATING	NTT Global Data Centers	Wholesale/Colocation		12.6		
140	NTT/RagingWire VA2	Loudoun	OPERATING	NTT Global Data Centers	Wholesale/Colocation		16		
141	NTT/RagingWire VA3	Loudoun	OPERATING	NTT Global Data Centers	Wholesale/Colocation	245,000	16		
142	NTT/RagingWire VA4	Loudoun	OPERATING	NTT Global Data Centers	Wholesale/Colocation				
143	Vantage VA1 Ashburn I	Loudoun	OPERATING	Vantage Data	Hyperscale	720,000	146		

#	Facility	County	Status	Owner/ Operator	Type	Size (SF)	Power (MW)	Yr	Investment (\$)
	Campus			Centers					
144	Vantage VA2 Ashburn II Campus	Loudoun	OPERATING	Vantage Data Centers	Hyperscale	800,000 (planned)			\$380M+
145	Vantage VA3 Ashburn III Campus	Loudoun	UNDER CONSTRUCTION	Vantage Data Centers	Hyperscale				
146	Centersquare DC2 (ex-Cyxtera)	Loudoun	OPERATING	Centersquare (Brookfield)	Colocation				
147	Centersquare DC3 (ex-Cyxtera)	Loudoun	OPERATING	Centersquare (Brookfield)	Colocation				
148	Centersquare DC4 (ex-Cyxtera)	Loudoun	OPERATING	Centersquare (Brookfield)	Colocation				
149	Centersquare DC7 (ex-Cyxtera)	Loudoun	OPERATING	Centersquare (Brookfield)	Colocation				
150	Centersquare (ex-Evoque/AT &T) Reston	Fairfax	OPERATING	Centersquare (Brookfield)	Colocation				
151	Google Prince William Campus	Prince William	OPERATING	Google (GOOGL)	Hyperscale				
152	Google Arcola Campus	Loudoun	OPERATING	Google (GOOGL)	Hyperscale				
153	Google Leesburg	Loudoun	UNDER CONSTRUCTION	Google (GOOGL)	Hyperscale				\$9B total VA
154	Microsoft Leesburg (IAD01)	Loudoun	OPERATING	Microsoft (MSFT)	Hyperscale/Cloud	245,000+			
155	Microsoft Manassas (MNZ01/02)	Prince William	UNDER CONSTRUCTION	Microsoft (MSFT)	Hyperscale/Cloud	623,360			
156	QTS Ashburn-Broderick	Loudoun	OPERATING	QTS (Blackstone)	Wholesale/Colocation				
157	Starwood Herndon (AWS tenant)	Fairfax	UNDER CONSTRUCTION	Starwood Capital	Hyperscale				
158	Aligned Ashburn	Loudoun	OPERATING	Aligned Data Centers	Hyperscale				
159	Cologix Ashburn	Loudoun	UNDER CONSTRUCTION	Cologix	Colocation				
160	BlackChamber/AWS	Loudoun	PROPOSED	BlackChamber	Hyperscale	1,700,000			

#	Facility	County	Status	Owner/ Operator	Type	Size (SF)	Power (MW)	Yr	Investment (\$)
	Arcola			Group (AWS tenant)					
161	AWS Ashton Ave (3 bldgs, shelved)	Prince William	DELAYED	Amazon (AWS)	Hyperscale				
162	Centra (Henrico)	Henrico	PROPOSED	Centra	Data Center				
163	Iron Mountain VA-1	Prince William	OPERATING	Iron Mountain (IRM)	Wholesale	165,230	400+ (campus)		
164	Iron Mountain VA-2	Prince William	OPERATING	Iron Mountain	Wholesale	211,000	36		
165	Iron Mountain VA-3	Prince William	OPERATING	Iron Mountain	Wholesale	304,654			
166	Iron Mountain VA-4	Prince William	OPERATING	Iron Mountain	Wholesale	182,032			
167	Iron Mountain VA-5	Prince William	OPERATING	Iron Mountain	Wholesale	220,134			
168	Iron Mountain VA-6	Prince William	OPERATING	Iron Mountain	Wholesale	213,000			
169	Iron Mountain VA-7	Prince William	OPERATING	Iron Mountain	Wholesale	290,307			
170	DataBank IAD1	Loudoun	OPERATING	DataBank	Colocation	85,330	9.9		
171	DataBank IAD3	Loudoun	OPERATING	DataBank	Colocation	200,000	40		
172	DataBank IAD4	Loudoun	OPERATING	DataBank	Colocation	70,000	20		
173	NTT/ RagingWire VA5	Loudoun	OPERATING	NTT Global Data Centers	Wholesale/ Colocation				
174	NTT/ RagingWire VA6	Loudoun	OPERATING	NTT Global Data Centers	Wholesale/ Colocation				
175	NTT/ RagingWire VA7	Loudoun	OPERATING	NTT Global Data Centers	Wholesale/ Colocation	125,000	36		
176	NTT/ RagingWire VA8	Loudoun	OPERATING	NTT Global Data Centers	Wholesale/ Colocation				
177	Digital Realty IAD12	Loudoun	OPERATING	Digital Realty	Wholesale	180,000			
178	Digital Realty IAD13	Loudoun	OPERATING	Digital Realty	Wholesale				
179	Digital Realty IAD14	Loudoun	OPERATING	Digital Realty	Wholesale	135,000			

#	Facility	County	Status	Owner/ Operator	Type	Size (SF)	Power (MW)	Yr	Investment (\$)
180	Digital Realty IAD18	Loudoun	OPERATING	Digital Realty	Wholesale				
181	Digital Realty IAD39	Loudoun	OPERATING	Digital Realty	Wholesale	1,057,000	500 (campus)		
182	Digital Realty IAD41	Loudoun	OPERATING	Digital Realty	Wholesale				
183	Digital Realty IAD42	Loudoun	OPERATING	Digital Realty	Wholesale				
184	Stack NVA02 Campus	Prince William	OPERATING	STACK Infrastructure	Hyperscale		420		
185	QTS Manassas DC1-DC6	Prince William	OPERATING	QTS (Blackstone)	Wholesale/Colocation		190		
186	Aligned IAD 02	Loudoun	OPERATING	Aligned Data Centers	Hyperscale		120		
187	Sabey SDC Ashburn	Loudoun	OPERATING	Sabey Data Centers	Colocation				
188	AWS IAD76	Loudoun	OPERATING	Amazon (AWS)	Hyperscale				
189	AWS IAD58	Loudoun	OPERATING	Amazon (AWS)	Hyperscale				
190	AWS IAD150	Loudoun	OPERATING	Amazon (AWS)	Hyperscale				
191	AWS IAD6	Loudoun	OPERATING	Amazon (AWS)	Hyperscale				
192	AWS IAD13	Loudoun	OPERATING	Amazon (AWS)	Hyperscale				
193	AWS IAD63	Fairfax	OPERATING	Amazon (AWS)	Hyperscale				
194	AWS IAD74	Prince William	OPERATING	Amazon (AWS)	Hyperscale				
195	AWS MNZ01	Prince William	OPERATING	Amazon (AWS)	Hyperscale				
196	AWS Bethlehem Tech Park DC18	Prince William	OPERATING	Amazon (AWS)	Hyperscale				
197	AWS 10281 Tanner Way	Prince William	OPERATING	Amazon (AWS)	Hyperscale				
198	AWS DCA-51	Fauquier	OPERATING	Amazon (AWS)	Hyperscale		50-100		
199	1501 Moran Rd Data Center	Loudoun	OPERATING	Private	Private		50-100		
200	1571 Beaumeade Circle DC	Loudoun	OPERATING	Private	Private		25-50		
201	22810-22860 International Dr	Loudoun	OPERATING	Private	Private		10-25		

#	Facility	County	Status	Owner/ Operator	Type	Size (SF)	Power (MW)	Yr	Investment (\$)
202	22995 Wilder Court DC	Loudoun	OPERATING	Private	Private		<10		
203	Aerospace Data Facility - East	Fairfax	OPERATING	NRO/US Government	Government/Classified		50-100		
204	11:11 Systems Reston	Fairfax	OPERATING	11:11 Systems	Colocation				
205	Serverfarm Vienna DC2	Fairfax	OPERATING	Serverfarm	Colocation				
206	DataBank McLean IAD2	Fairfax	OPERATING	DataBank	Colocation	40,690	3		
207	QTS Richmond 2 (DC6)	Henrico	OPERATING	QTS (Blackstone)	Wholesale		12.86		
208	EdgeConn eX RIC01	Henrico	OPERATING	EdgeConn eX	Edge/Colocation		11		
209	GFH Capital 1751 Meadowville	Chesterfield	OPERATING	GFH Capital	Private		<10		
210	TECfusions Boydton	Mecklenburg	OPERATING	TECfusions	Colocation		80		
211	Microsoft Boydton Expansion (1-11 Bldgs)	Mecklenburg	OPERATING	Microsoft	Hyperscale	316,300			
212	Mineral Gap DC	Wise	OPERATING	DP Facilities	Enterprise		3.4		
213	OnePartner ATAC	Scott	OPERATING	OnePartner	Enterprise				
214	Microsoft Gainesville DC	Prince William	PROPOSED	Microsoft (MSFT)	Hyperscale		2,982		
215	AWS North Creek Tech Campus	Louisa	PROPOSED	Amazon (AWS)	Hyperscale		2,700		
216	Garrett Dev GW Village DC	Stafford	PROPOSED	Garrett Development	Hyperscale		2,100		
217	Active Infra Spring Valley Tech	Loudoun	PROPOSED	Active Infrastructure	Hyperscale		1,300		
218	Amazon Wilderness Crossing	Orange	PROPOSED	Amazon (AWS)	Hyperscale		1,500	2027	
219	Google Botetourt	Botetourt	PROPOSED	Google (GOOGL)	Hyperscale				\$3B
220	DataBank Culpeper Campus (IAD5-6)	Culpeper	PROPOSED	DataBank	Colocation	613,152	192		

#	Facility	County	Status	Owner/ Operator	Type	Size (SF)	Power (MW)	Yr	Investment (\$)
221	Penzance/ AWS Chantilly	Fairfax	PROPOSED	Penzance (AWS tenant)	Hyperscale	240,000	45	2027	
222	Amazon IAD-350 Stafford	Stafford	PROPOSED	Amazon (AWS)	Hyperscale		100-250		
223	Amazon Cosner Tech Campus	Spotsylvania	UNDER CONSTRUCTION	Amazon (AWS)	Hyperscale		250+		
224	Amazon Bristow	Prince William	UNDER CONSTRUCTION	Amazon (AWS)	Hyperscale				
225	Microsoft Prison Road Campus	Mecklenburg	UNDER CONSTRUCTION	Microsoft	Hyperscale				
226	Microsoft Hillcrest Campus	Mecklenburg	UNDER CONSTRUCTION	Microsoft	Hyperscale		336	2025	
227	Iron Mountain RCH-1 (Henrico)	Henrico	UNDER CONSTRUCTION	Iron Mountain (IRM)	Wholesale	364,860	48	2027	
228	AWS Nokes Blvd Demolitions	Loudoun	DECOMMISSIONED	Amazon (AWS)	Redevelopment				\$30.8M purchase
229	AWS Sterling Office Demolitions	Loudoun	DECOMMISSIONED	Amazon (AWS)	Redevelopment	900,000 (new capacity)			
230	Hornbaker Road DC	Prince William	REJECTED	Private	Data Center				
231	DC BLOX Richmond	Richmond City	WITHDRAWN	DC BLOX	Colocation				\$500M
232	Centra Logistics Henrico	Henrico	WITHDRAWN	Centra	Data Center				
233	Amazon Louisa (cancelled)	Louisa	CANCELLED	Amazon (AWS)	Hyperscale				
234	AWS IAD78	Loudoun	OPERATING	Amazon (AWS)	Hyperscale			2021	
235	AWS IAD90	Loudoun	OPERATING	Amazon (AWS)	Hyperscale			2022	
236	AWS IAD91	Loudoun	OPERATING	Amazon (AWS)	Hyperscale			2022	
237	AWS IAD92	Loudoun	OPERATING	Amazon (AWS)	Hyperscale			2023	
238	AWS IAD114	Loudoun	OPERATING	Amazon (AWS)	Hyperscale			2019	
239	AWS IAD115	Loudoun	OPERATING	Amazon (AWS)	Hyperscale			2020	
240	AWS IAD134	Fairfax	OPERATING	Amazon (AWS)	Hyperscale			2021	
241	AWS IAD135	Fairfax	OPERATING	Amazon (AWS)	Hyperscale			2021	

#	Facility	County	Status	Owner/ Operator	Type	Size (SF)	Power (MW)	Yr	Investment (\$)
242	AWS IAD136	Fairfax	OPERATING	Amazon (AWS)	Hyperscale			2022	
243	AWS IAD144	Loudoun	OPERATING	Amazon (AWS)	Hyperscale			2021	
244	AWS IAD145	Loudoun	OPERATING	Amazon (AWS)	Hyperscale			2022	
245	AWS IAD169	Loudoun	OPERATING	Amazon (AWS)	Hyperscale			2023	
246	AWS IAD179	Loudoun	OPERATING	Amazon (AWS)	Hyperscale			2024	
247	AWS IAD215	Loudoun	OPERATING	Amazon (AWS)	Hyperscale			2024	
248	AWS IAD52	Prince William	OPERATING	Amazon (AWS)	Hyperscale			2018	
249	AWS IAD101	Prince William	OPERATING	Amazon (AWS)	Hyperscale	150,000	35	2019	
250	AWS IAD104 (Mason King)	Prince William	OPERATING	Amazon (AWS)	Hyperscale			2020	
251	AWS IAD105 (Mason King)	Prince William	OPERATING	Amazon (AWS)	Hyperscale			2021	
252	AWS IAD106 (Mason King)	Prince William	OPERATING	Amazon (AWS)	Hyperscale			2021	
253	Equinix DC7	Fairfax	OPERATING	Equinix (EQIX)	Retail Colocation			2005	
254	Equinix DC8	Fairfax	OPERATING	Equinix	Retail Colocation			2007	
255	Equinix DC9	Fairfax	OPERATING	Equinix	Retail Colocation			2015	
256	Equinix DC17	Loudoun	OPERATING	Equinix	Retail Colocation				
257	Equinix CU1	Culpeper	OPERATING	Equinix	Retail Colocation	50,000 (est)	10	2008	\$100M
258	Equinix CU2	Culpeper	OPERATING	Equinix	Retail Colocation	50,000 (est)	10	2009	
259	Equinix CU3	Culpeper	OPERATING	Equinix	Retail Colocation	50,000 (est)	10	2010	
260	Equinix CU4	Culpeper	OPERATING	Equinix	Retail Colocation	50,000 (est)	10	2012	
261	DataBank IAD5	Culpeper	UNDER CONSTRUCTION	DataBank	Wholesale Colocation	700,000	72	2026	\$500M
262	DataBank IAD6	Culpeper	UNDER CONSTRUCTION	DataBank	Wholesale Colocation	700,000	120	2027	\$800M
263	NTT VA10	Loudoun	UNDER CONSTRUCTION	NTT Global Data Centers	Wholesale Colocation		130	2026	
264	QTS Ashburn 3 DC1	Loudoun	OPERATING	QTS (Blackstone)	Wholesale Colocation	150,000	80	2021	
265	QTS Manassas DC1	Prince William	OPERATING	QTS (Blackstone)	Wholesale Colocation	123,200	24	2020	
266	QTS Manassas	Prince William	OPERATING	QTS (Blackstone)	Wholesale Colocation	150,000	30	2021	

#	Facility	County	Status	Owner/ Operator	Type	Size (SF)	Power (MW)	Yr	Investment (\$)
	DC2			e)					
267	STACK NVA01	Loudoun	OPERATING	STACK Infrastructure	Wholesale Colocation	140,000	17	2019	
268	STACK NVA13	Prince William	OPERATING	STACK Infrastructure	Wholesale Colocation		30	2023	
269	Digital Realty IAD43	Loudoun	UNDER CONSTRUCTION	Digital Realty	Wholesale Colocation			2026	
270	Microsoft Boydton-1	Mecklenburg	OPERATING	Microsoft (MSFT)	Hyperscale	110,000	24	2010	\$200M
271	Microsoft Boydton-5	Mecklenburg	OPERATING	Microsoft	Hyperscale	120,000	28	2014	\$220M
272	Microsoft Boydton-11	Mecklenburg	OPERATING	Microsoft	Hyperscale	140,000	35	2020	\$300M
273	Microsoft Timber Campus	Mecklenburg	OPERATING	Microsoft	Hyperscale		45	2023	
274	Microsoft AVC Campus	Mecklenburg	OPERATING	Microsoft	Hyperscale		45	2024	
275	Vint Hill Data Center	Fauquier	OPERATING	AWS (Sublease from OVH)	Hyperscale			2017	
276	Yondr Loudoun 2	Loudoun	UNDER CONSTRUCTION	Yondr Group	Hyperscale		48	2026	
277	Centersquare IAD4-B	Loudoun	OPERATING	Centersquare (Brookfield)	Retail Colocation			2014	
278	Sabey ASH1	Loudoun	OPERATING	Sabey Data Centers	Wholesale Colocation		20	2017	
279	CoreSite VA1 (corrected)	Fairfax	OPERATING	CoreSite	Wholesale Colocation			2013	
280	CoreSite VA2 (corrected)	Fairfax	OPERATING	CoreSite	Wholesale Colocation			2016	
281	Google ARA1	Loudoun	OPERATING	Google (GOOGL)	Hyperscale	200,000	40	2022	
282	Compass Leesburg (address)	Loudoun	UNDER CONSTRUCTION	Compass Datacenters	Hyperscale			2026	
283	Iron Mountain RCH-1 (address)	Henrico	UNDER CONSTRUCTION	Iron Mountain (IRM)	Wholesale	364,860	48	2026	
284	Microsoft MNZ01 (Manassas)	Prince William	OPERATING	Microsoft (MSFT)	Hyperscale	250,000	50	2022	\$500M+
285	Chirisa Richmond (operating)	Chesterfield	OPERATING	Chirisa	Wholesale Colocation	150,000	30	2023	\$200M

#	Facility	County	Status	Owner/ Operator	Type	Size (SF)	Power (MW)	Yr	Investment (\$)
286	AWS Birchwood	King George	PROPOSED	Amazon (AWS)	Hyperscale		2,175	2028	

APPENDIX E: CANCELED, REJECTED, AND WITHDRAWN PROJECTS

The register of defeated and withdrawn projects is as much a part of the statewide picture as the operating fleet. It records where communities exercised leverage, and how.

Project	County	Developer	Size/ Capacity	Date	Outcome	Reason
PW Digital Gateway	Prince William	Compass/QTS	22M+ SF, 37 DCs	Dec 2023 / Aug 2025	Legal limbo	Rezoning void; failed public-notice (Va. Code § 15.2-2204). COA affirmed Mar 31, 2026; QTS petition pending at SCV
Gigaland Remington	Fauquier	Gigaland LLC	800 MW	Withdrawn Sept 2025	Withdrawn	Planning commission denied; community opposition
Headwaters Catlett	Fauquier	Headwaters Site Dev.	—	July 2024	Withdrawn	Pulled before hearing
Amazon Warrenton	Fauquier	Amazon (AWS)	220K SF	Approved 2024; blocked	Blocked	500+ opposed; 3 lawsuits; council voted out
AWS Louisa County	Louisa	Amazon (AWS)	1.7M SF	Filed Sept 2023	Withdrawn	Community resistance
Tract Chesterfield	Chesterfield	Tract (Denver)	—	2025	Withdrawn	Planning Commission unanimously against
Tract Mountain Road	Hanover	Tract (Denver)	430 ac	Rejected May 27, 2026	Rejected	Board of Supervisors denied (4-3)
WestDulles Tech Park	Hanover	WestDulles Properties	—	Dec 2024	Rejected	Hanover denied
HHHunt Hanover	Hanover	HHHunt	3.3M SF, 10 bldgs	Jan 2026	Withdrawn	Community concerns

Project	County	Developer	Size/ Capacity	Date	Outcome	Reason
Charles City DC	Charles City	Kansas-based	—	Aug 2025	Withdrawn	Neighbor opposition
Balico MegaCampus	Pittsylvania	Balico LLC	84 DCs + 3,500 MW gas	Defeated 2025	Defeated	2nd-largest gas plant in US; denied 6-1
DC BLOX (original)	Henrico	DC BLOX	Larger plan	2024	Revised	Opposition
Henrico Mountain Rd	Henrico	Undisclosed	—	2024-25	Blocked	Henrico ordinance
PWC 40-acre DC	Prince William	Undisclosed	40 ac	Nov 2025	Rejected	Zoning denied
Fredericksburg Area	Fredericksburg	Various	—	2024-25	Rejected	Zoning challenges
Hornbaker Road DC	Prince William	Private	—	2024-25	Rejected	Outside Opportunity Overlay District
DC BLOX Richmond	Richmond City	DC BLOX	—	2024-25	Withdrawn	Community opposition
Centra Logistics	Henrico	Centra	—	2025	Withdrawn	Retroactive zoning rules

Heatmap Research counted more than 25 Virginia data center cancellations in 2025, roughly four times the 2024 rate, with 21 in the second half of the year. Data Center Watch tracked tens of billions of dollars in projects blocked or delayed nationally over 2024-25, with Virginia carrying a disproportionate share. The register is growing faster than the operating fleet, which is itself a measure of how the politics have turned.

APPENDIX F: KEY OPERATORS

Operator	Ownership	Virginia footprint (selected)	Notes
Equinix	NASDAQ: EQIX	19+ (Ashburn, Manassas, Culpeper)	Ashburn campus the “web’s busiest meeting place”
Digital Realty	NYSE: DLR	32+ locations (NoVA)	
QTS Data Centers	Blackstone (private)	Richmond NAP, Sterling, Ashburn	Lone remaining Digital Gateway petitioner
CyrusOne	KKR/GIP (private)	15+ (Sterling, Ashburn)	\$15B acquisition
CloudHQ	Private	Ashburn, Manassas, Culpeper	2,000+ MW planned

Operator	Ownership	Virginia footprint (selected)	Notes
Amazon (AWS)	NASDAQ: AMZN	Dozens (US-East-1)	\$35B through 2040
Microsoft	NASDAQ: MSFT	Boydton (14 bldgs), NoVA	\$2B+ Boydton
Google	NASDAQ: GOOGL	Loudoun, PWC, Chesterfield, Botetourt	\$9B through 2026
Meta Platforms	NASDAQ: META	Henrico (2.5M SF)	\$1B+ Henrico
STACK Infrastructure	Private	Ashburn, Leesburg, Stafford	\$302.3M Stafford land
Iron Mountain	NYSE: IRM	Henrico, Manassas	
PowerHouse DC	AREP/Harrison Street	Loudoun, Spotsylvania (PH 95)	800 MW PH 95
Vantage Data Centers	Private	Stafford (929K SF)	\$2.2B
CleanArc	Private	Caroline (VA1)	\$3B+
EdgeCore	Private	Louisa (announced)	1,100 MW (1.1 GW)
Chirisa Technology Parks	AREP	Chesterfield (Meadowville)	\$2B

APPENDIX G: THE EVIDENTIARY BASE

The argument rests on a small number of primary studies, recorded here so that readers can return to the sources rather than the secondary coverage of them.

The anchor is the Joint Legislative Audit and Review Commission, *Data Centers in Virginia* (RD206), published December 9, 2024, the most comprehensive legislative assessment of the industry any state has produced. Its findings on employment, electricity demand, ratepayer cost, water, noise, and infrastructure risk run through PART ONE and should be cited to the primary report rather than to the press accounts of it.

The Carl Vinson Institute of Government’s December 2025 evaluation of Georgia’s data center sales and use tax exemption is the methodological benchmark for the but-for discussion and the source of the 30 percent attribution finding. The broader incentives literature, principally the work of Timothy Bartik at the W.E. Upjohn Institute, supplies the national baseline, and an econometric study of Texas data center openings by Ball State University’s Center for Business and Economic Research supplies the employment-effect finding. The University of Virginia’s Weldon Cooper Center for Public Service is the source of the declining Virginia-specific attribution estimate.

The Northern Virginia Technology Council’s longitudinal studies (2022, 2024, and 2026) provide the industry’s own account of its economic contribution and are useful for facility and investment counts. They should be read as advocacy-adjacent documents, valuable but not disinterested.

The facility-level and jurisdiction-level record draws on local planning and zoning files, State Corporation Commission dockets, U.S. Army Corps of Engineers public notices, Virginia DEQ air-permit registries, county budget and tax-rate documents, utility integrated resource plans and investor materials, state and federal court records, and sustained regional reporting. The companion case studies in Appendix H carry the full primary-source apparatus for each jurisdiction.

APPENDIX H: COMPANION CASE STUDIES

This report synthesizes the following companion case studies by the author. Each develops, with primary-source depth, the local record that this analysis reads comparatively. Citations use concept DOIs, which always resolve to the latest version of each work. Where a study’s specific finding is used in the text, it is cited to the relevant volume.

Turner, T. N. (2026). *Henrico County: How Two Neighborhoods Forced Virginia’s Second-Largest Data Center Jurisdiction to Change Course*. Version 3.6. DOI 10.5281/zenodo.20671031.

Turner, T. N. (2026). *Hanover County: Mountain Road, Tract, and the Search for Leverage*. Version 2.0. DOI 10.5281/zenodo.20672048.

Turner, T. N. (2026). *Chesterfield County: The \$0.24 Rate, the Thirty-Year Lock, and the Two-Corridor County*. Version 3.0. DOI 10.5281/zenodo.20672436.

Turner, T. N. (2026). *Orange County and the Town of Orange: Convergence at Two Scales*. Version 3.0. DOI 10.5281/zenodo.20672496.

Turner, T. N. (2026). *Prince William County: Governance Capture, the Revolving Door, and the Democratic Correction*. Version 2.0. DOI 10.5281/zenodo.20673498.

Turner, T. N. (2026). *Goochland County: The Overlay, the Lawsuit, and the Template*. Version 1.0. DOI 10.5281/zenodo.20673467.

Turner, T. N. (2026). *Louisa County: The First Overlay, the Amazon Retreat, and the \$17 Billion Bet*. Version 1.0. DOI 10.5281/zenodo.20673455.

Turner, T. N. (2026). *Botetourt County: Google at Greenfield, the Water Authority, and the Wave Reaching the Valley*. Version 1.0. DOI 10.5281/zenodo.20673512.

Turner, T. N. (2026). *Mecklenburg County: Boydton, South Hill, and What Fifteen Years of Data Centers Bought*. Version 1.0. DOI 10.5281/zenodo.20673484.

Turner, T. N. (2026). *Culpeper County: The Quiet Successor*. Version 1.0. DOI 10.5281/zenodo.20673529.

Turner, T. N. (2026). *The Fredericksburg Ring: Five Jurisdictions, One Corridor*. Version 1.0. DOI 10.5281/zenodo.20673542.

Turner, T. N. (2026). *When the Operator Builds the Plant: The Google-Commonwealth Fusion Systems Power-Purchase Agreement*. Version 2.0. DOI 10.5281/zenodo.20679935.

Turner, T. N. (2026). *Virginia Data Center Research and Industry Directory*. Version 3.0. DOI 10.5281/zenodo.20673582.

ENDNOTES

Notes identify the primary source for each claim. Claims drawn from the author's companion case studies are cited to the relevant volume in Appendix H, which carries the underlying primary-source apparatus.

[1] JLARC, Data Centers in Virginia (RD206), December 9, 2024, at 27 (unconstrained demand for power in Virginia doubles within ten years, with data centers the main driver). The share figures are not JLARC's, which publishes no percentage share of state electricity: Dominion Energy, Inc. and Virginia Electric and Power Company, Forms 10-K for fiscal years 2023 and 2025, Item 1, "Dominion Energy Virginia" (data centers 24 percent of Virginia Power's electricity sales for 2023 and 28 percent for 2025); EPRI, Powering Intelligence: Analyzing Artificial Intelligence and Data Center Energy Consumption (May 2024), Table 2 at 13 (Virginia 25.59 percent of total state electricity consumed, 2023) and Table A1 at 29 (North Dakota 15.42 percent).

[2] JLARC RD206, Figure 3-3 at 28 (average monthly energy use, 2023 base year to 2040: approximately 15 percent growth without new data center load against approximately 183 percent with it; both percentages derived from the figure, which JLARC does not state in text); PJM 2025 Long-Term Load Forecast (data centers 94 percent of 2024-2030 peak-load growth); EPRI, Powering Intelligence 2026 (February 2026), Executive Summary (39-57 percent of Virginia electricity by 2030).

[3] Virginia Department of Taxation, biennial Retail Sales and Use Tax Data Center Exemption report (published January 2, 2026): FY2025 aggregate benefit \$1,941,390,000. Va. Code Section 58.1-609.3(18) (qualifying investment of at least \$150 million and at least 50 jobs; statutory sunset June 30, 2035).

[4] Virginia sales and use tax of approximately 5.3 percent (4.3 percent state, 1 percent local); the local share of the FY2025 exempted purchases is on the order of \$360 million.

[5] JLARC follow-up (2025): data centers avoided approximately \$2.7 billion in state sales and use taxes from FY2015 through FY2024, more than half of all economic-development tax incentives granted.

[6] JLARC RD206 (~50 full-time workers, about half contractors, per typical 250,000-square-foot facility); Carl Vinson Institute of Government, University of Georgia (December 2025): 1,873 permanent data center employees statewide; Ball State University, Center for Business and Economic Research (net county-employment effect effectively zero).

[7] Mecklenburg County case study (Turner 2026); host-town council record, November 2010 (two on-site operator employees; promised 50 jobs assigned to a staffing contractor); construction-trades official quoted in the same case study.

[8] JLARC RD206; the industry's construction-ecosystem argument and its qualifications; the exemption applies to equipment purchases rather than building contracts.

[9] JLARC RD206 (\$14–\$37 per month in constant dollars by 2040, up to \$444 per year); Dominion Energy 2025 IRP Update (average monthly residential bill rising from \$159 toward \$255 by 2035 under utility methodology and \$308 under the SCC's preferred methodology).

[10] Dominion Q4 2025 investor presentation (five-year capital plan \$64.7 billion for 2026–2030); February 2025 plan of \$50.1 billion (a 16 percent increase); 16,913 MW under firm contract plus 30,132 MW under study, 47,045 MW total; \$28.3 billion transmission capital; connection wait times up to seven years; total generation-scenario capital of \$91.8 billion to \$270 billion against a state operating budget of roughly \$83.3 billion.

[11] PJM capacity auction clearing at the \$444.26 per megawatt-day cap in the Dominion zone for 2025/26 (an increase of more than 800 percent), with the independent market monitor attributing the majority to data center load; SCC residential bill increase of \$11.24 per month (November 2025); SCC creation of the GS-5 rate class (November 2025).

[12] North American Electric Reliability Corporation incident report and task force on the July 10, 2024 event near Fairfax: roughly 60 data centers disconnected simultaneously, instantaneous loss of about 1,500 megawatts on a 230-kilovolt fault.

[13] SCC certificate-of-public-convenience-and-necessity requirement for lines above 115 kilovolts; the proposed Valley Link 765-kilovolt line and associated substation relocations; Piedmont county resolutions and appeals to the regional grid operator (Culpeper and Orange County case studies, Turner 2026).

[14] JLARC RD206 (local burdens: low-frequency noise, water constraints, scenic and historic resources, concentrated diesel backup).

[15] Louisa and Hanover County case studies (Turner 2026): reservoir safe yield near 3.2 million gallons a day against a single operator's projected draw; Hanover system capacity of 24.7 million gallons a day total and 13.5 million peak against a project peak demand of two million.

[16] Master facility inventory (Appendix D); disclosure-vacuum counts in Appendix A: of 286 records, 191 carry no power figure, 258 no water figure, 254 no investment figure.

[17] Botetourt County case study (Turner 2026): the first Virginia ruling that a data center's water use is not a trade secret; SB 553 (2026 Va. Acts ch. 896), data center water-use disclosure mandate.

[18] JLARC RD206 (90 percent, survey-based); University of Virginia, Weldon Cooper Center (roughly 50 percent and declining); Carl Vinson Institute of Government, December 2025 (30 percent, econometric, 34 facilities with national control dataset); Timothy Bartik, W.E. Upjohn Institute (roughly 25 percent, broad incentives literature).

[19] Synthesis of the estimates in note 18; the structural advantages that anchor the industry in Virginia (geography, fiber, federal proximity, labor and vendor clusters, compounding infrastructure).

[20] Hanover County case study (Turner 2026): proffer cash component rising from roughly \$90,000 toward about \$21 million over fourteen weeks as approval grew less likely.

[21] Loudoun County budget materials and the statewide inventory (Appendix C): 350-plus operating facilities, 450-plus known total, on the order of \$800 million in annual data center revenue; first major denial and ordinance overhaul after a decade of by-right development.

[22] Henrico County case study (Turner 2026): White Oak Technology Park; the 2009 Qimonda bankruptcy; subsea-cable era; the 2017 equipment-rate cut from \$3.50 to \$0.40 per \$100.

[23] Henrico County case study (Turner 2026); board action June 10, 2025 (5-0) ending by-right approval, raising the rate to \$2.60, and adopting design standards; grandfathered pipeline of roughly 17 buildings and about 8 million square feet, including a same-day land transfer at roughly double the acquisition price and a subsequent request for several hundred additional diesel generators.

[24] Henrico County case study (Turner 2026): the Varina District burden and the affluent-community organizing that converged on ending by-right approval.

[25] Henrico County case study (Turner 2026); Board of Zoning Appeals denial of a vested-rights claim, February 2026, where the developer's purchase postdated the ordinance change.

[26] Hanover County case study (Turner 2026): the recruitment apparatus; the 2023 dedicated \$0.45 rate; the Route 33 Gateway small-area plan; the unanimous March 2024 approval of a 1,211-acre, 2.4-gigawatt campus.

[27] Hanover County case study (Turner 2026): Mountain Road (427 acres, 900 MW, 2.6 million square feet); proffer escalation; county water capacity of 24.7 million gallons a day total and 13.5 million peak against a two-million-gallon peak demand; four-to-three rejection May 27, 2026; deciding-bloc supervisor's stated reasoning.

[28] Hanover County case study (Turner 2026): the April 2026 removal of the \$0.45 rate and advertisement of a replacement up to \$3.00 per \$100, with a vote scheduled for late June; the comprehensive plan as a non-binding guide under *Board of Supervisors v. Snell Construction* (1974).

[29] Appendix E (canceled, rejected, and withdrawn projects): the Amazon Warrenton blocking and an 800-megawatt withdrawal in Fauquier; the 6-1 defeat of a mega-campus pairing 84 buildings with a 3,500-megawatt gas plant in Pittsylvania.

[30] Botetourt County case study (Turner 2026): Project Raspberry; the October 1, 2024 option; the November 26, 2024 five-to-nothing ordinance edit and rezoning; the June 2025 closing for roughly \$14 million plus a \$4 million payment through a shell entity; operator confirmation in March 2026.

[31] Botetourt County case study (Turner 2026); performance agreement: effective equipment rate capped at \$2.40 per \$100 for 20 years per building; at least \$1 billion and 50 jobs per building with a no-obligation-to-develop provision; county undertakings to assist in resisting disclosure and to cede media and press relations; the \$4 million community payment directed largely to public-safety hardware.

[32] Botetourt County case study (Turner 2026); the November 5, 2025 circuit-court ruling that a data center's water use is not a trade secret; water demand rising from two million gallons a day toward as much as eight million, with the county exposed to the first \$100 million of a new source; the Greenfield plantation history and the prior relocation of a slave dwelling.

[33] Chesterfield County case study (Turner 2026): the \$0.24 rate adopted April 10, 2019; the thirty-year economic-development grant-back; estimated annual revenue gaps of \$91 million against Henrico, \$151 million against Loudoun, and \$164 million against Prince William at full build-out; the 2026 conditional-use reform; the separately recruited operator without a grant-back.

[34] Chesterfield County case study (Turner 2026); SCC approval (November 25, 2025) of a 944-megawatt, \$1.47 billion gas peaker in a census tract that is 84 percent people of color and 73 percent low-income; a federal permit disclosing a cemetery with possible unmarked graves; the environmental attorney's statement on the Environmental Justice Act; the two-corridor distributional pattern.

[35] Prince William County case study (Turner 2026): the Digital Gateway comprehensive-plan amendment (5-2, November 2022, after a fourteen-hour hearing) and rezonings (4-3-1, December 13, 2023, after roughly a twenty-seven-hour hearing) by a lame-duck board.

[36] Prince William County case study (Turner 2026): the supervisor's land sale to a developer ten days before joining the application, recusal, and move to lobbying; the board chair's holdings in an operator's parent company; a \$100,000 political-action-committee contribution after a favorable vote; the equipment rate rising from a frozen \$1.25 to \$4.50 per \$100; \$293.7 million collected from the industry in 2024.

[37] Prince William County case study (Turner 2026); circuit-court ruling voiding the rezonings ab initio (August 2025); Court of Appeals affirmance March 31, 2026 (warning against "sandbagging"); roughly \$1.7 million spent in defense; the dissenting supervisor's "first law of digging holes" statement.

[38] Mecklenburg County case study (Turner 2026): the 2010 first commitment; by-right zoning adopted before buyers were named; operator ownership of eleven of twelve sites across some 3,762 acres; data center taxes at 35 to nearly 48 percent of the general fund; the \$154 million school complex and three elementary schools funded without borrowing; the thirty-one-cent real-estate rate.

[39] Mecklenburg County case study (Turner 2026); county tax records: a ninety-percent public claim against a documented 82.5 percent rebate; more than \$275 million rebated across FY2019-FY2024; the 2024 restructuring; roughly 700 jobs; host-town population decline from 431 toward roughly 300; the Moseley family cemetery and the relocation of 37 graves (ProPublica, December 2022); the county official's contemporaneous statement.

[40] Mecklenburg County case study (Turner 2026): the county fisc keyed to the operator's equipment-refresh cycle, and the three findings the case returns to the prospective portfolio.

[41] Louisa County case study (Turner 2026): the technology overlay district (April 2023, six-to-one, roughly 6,400 acres by right); the \$11 billion Amazon commitment; the \$1.25 rate; the August 2024 conversion to conditional-use; the

Amazon third-campus withdrawal in 2025; the markedly tighter later performance agreement.

[42] Louisa County case study (Turner 2026): the overlay drawn toward unprotected land; reservoir safe yield near 3.2 million gallons a day; the first \$17.099 million in small modular reactor feasibility costs on residential ratepayer bills; the resident's hearing statement.

[43] Goochland County case study (Turner 2026): the 2019 \$0.40 rate; the November 6, 2025 adoption (4-1, no speaker in support, more than a thousand emails opposed) of a ~4,400-acre overlay and zone; the first application from the developer Hanover rejected two weeks earlier; the December 2025 suit (defective notice, inadequate standards, material night-of-vote change); the May 2026 ruling rejecting the 8,500-page record; the October 2026 demurrer; neighboring Henrico supervisors testifying against the ordinance.

[44] Culpeper County case study (Turner 2026): the 2021 ~690-acre by-right technology zone; roughly 12-13 million square feet and 2,435 megawatts of delivery requests; contested votes and denials outside the zone; the September 2025 county-wide end of by-right approval exempting the zone; the never-discounted \$3.50 rate; the town's minimum-revenue agreement guaranteeing at least \$1.5 million per building per year for fifteen years plus an operator-funded reclaimed-water system.

[45] Orange County case study (Turner 2026): the town (February 2026) and county (April 28, 2026, 5-0) removal of data centers from by-right into a floating technology district created in December 2025; the ten-thousand-square-foot cap on facilities outside the district; the April 2023 Wilderness Crossing rezoning (4-1; 2,602 acres, 732 acres of data center, 5 million square feet, ~1,500 MW); the battlefield-group challenge allowing four of seven counts to proceed (September 2025); the forced disclosure that ten officials signed non-disclosure agreements for the operator's benefit.

[46] Statewide synthesis (Appendix C) and the companion case studies (Turner 2026): the diffusion from the saturated Northern Virginia core through the I-95 and Richmond rings to the Piedmont frontier and the Southside and Valley far edge.

[47] Hanover and Goochland County case studies (Turner 2026) (the developer rejected at Hanover filing in Goochland fourteen days later); Chesterfield, Botetourt, and CFS-Google PPA case studies (Google's shell and code-named entities); Amazon's presence across the Piedmont and I-95 ring and the Orange

non-disclosure-agreement disclosure; the Louisa overlay template copied elsewhere.

[48] Fredericksburg Ring case study (Turner 2026): the identical \$1.25 per \$100 compact dating to roughly 2018; at least 5.4 gigawatts and roughly 44 million square feet entitled across the five fall-line jurisdictions.

[49] Fredericksburg Ring case study (Turner 2026): Spotsylvania (more than 16 million square feet, an 800-megawatt by-right campus, and a post-election reversal to special-use permits); Stafford (a 750-foot setback followed by grandfathering of approved campuses); Caroline (a purpose-built zoning district and a competing by-right 900-megawatt campus); King George (a \$6 billion coal-plant conversion, then a rescinded performance agreement and downzoning); the City of Fredericksburg (the ring's only by-right overlay and a \$10 billion announcement).

[50] Fredericksburg Ring case study (Turner 2026): a Stafford campus on a cemetery holding at least 18 enslaved people; the Rappahannock Tribe's appeal under the Treaty of Middle Plantation of 1677 and the June 2026 ruling declining to dismiss the treaty claims; the King George vested-rights trial set for late 2026.

[51] Appendix B and the companion case studies (Turner 2026): disclosed equipment-rate range from \$0.24 (Chesterfield, contracted) to \$4.50 (Prince William), including Henrico's \$0.40-to-\$2.60 climb.

[52] Botetourt, Hanover, Chesterfield, Louisa, Orange, and Fredericksburg Ring case studies (Turner 2026): water as the decisive or withheld variable, and the first ruling that a data center's water use is not a trade secret.

[53] Mecklenburg County case study (Turner 2026): the rebate ledger; state-verified investment running ahead of contractual minimums while job counts lagged; announced investment as a promotional genre rather than an audited accounting category.

[54] Louisa County case study (Turner 2026) (small modular reactor feasibility costs on ratepayer bills); Piedmont transmission fights; the Google-Commonwealth Fusion Systems PPA case study (Turner 2026).

[55] Google-Commonwealth Fusion Systems PPA case study (Turner 2026): a 200-megawatt power-purchase agreement (June 30, 2025) for half of a planned 400-megawatt fusion plant in Chesterfield, bilateral and bypassing the utility, the SCC, and ratepayer cost recovery; the technology company as both equity owner and offtaker; a second offtaker's tranche valued at more than \$1 billion.

[56] Google-Commonwealth Fusion Systems PPA case study (Turner 2026): the GS-5 rate class; an estimate that roughly 60 percent of remaining infrastructure cost shifts back to residential ratepayers after the contract term; capacity auctions clearing at the cap with the increase ordered onto residential bills; the 944-megawatt gas bridge in a host block group that is 84 percent people of color and 73 percent low-income.

[57] Prince William, Botetourt, Goochland, and Orange County case studies (Turner 2026): the recurring sequence of a procedural shortcut or conflict of interest paired with a failure of the disclosure systems meant to catch it.

[58] State-frame synthesis; JLARC RD206; the exemption paired with withheld local management tools.

[59] 2026 Virginia Acts of Assembly: HB 507 (Tier IV backup-generator standards); SB 553 (water-use disclosure); SB 94 and HB 153 (siting and noise assessments); SB 253 and HB 1393 (cost allocation, narrowed at the reconvened session); SCC creation of the GS-5 rate class (November 2025); roughly fifteen data center bills passed (MultiState, March 30, 2026).

[60] Virginia budget coverage (February-June 2026): the data center exemption unresolved within the FY2027 budget impasse; statutory sunset June 30, 2035 (Va. Code Section 58.1-609.3(18)); a Senate proposal to sunset as early as 2027, a House proposal to preserve with conditions and an accountability commission, and the Governor's stated unwillingness to break signed contracts; Georgia's repeal-with-grandfather model.

[61] National legislative trackers: more than 300 data-center-related bills across more than 30 states in the 2026 sessions, with at least eight states acting to shift data center costs away from residential ratepayers or to condition the industry's tax treatment; a neighboring state's governor courting the industry during the same period.

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