



January 9, 2026

The Honorable Glenn Youngkin
Governor of Virginia
Patrick Henry Building, 3rd Floor
1111 East Broad Street
Richmond, VA 23219

RE: Request to Rescind Support for the Coastal Virginia Offshore Wind (CVOW) Project

Dear Governor Youngkin:

As you prepare to conclude your term, you have a final, critical opportunity to protect the Commonwealth's economic future from a looming catastrophe. On behalf of Falls Church-based National Legal and Policy Center ("NLPC") and the hundreds of thousands of Virginia ratepayers we represent through our advocacy for corporate integrity, I urge you to formally withdraw your support for Dominion Energy's Coastal Virginia Offshore Wind ("CVOW") project.

For years, Dominion has spun a sophisticated PR narrative claiming that this project is a "win" for Virginia's economy and a "clean" energy future. The reality, however, is a masterclass in crony capitalism. CVOW is an economic, logistical, and scientific failure that serves only to pad the regulated profits of Dominion's executives, while socializing the immense risks onto the backs of Virginia families and businesses.¹

The Economic Mirage

When CVOW was first presented to the State Corporation Commission ("SCC") in 2021, the price tag was a staggering \$9.8 billion.² Today that estimate has ballooned to \$11.2 billion—a 14% increase before the project is even fully operational.³ This does not

¹ "NLPC Asks Dominion Energy Shareholders to Oppose Incentives for Wind, Solar," National Legal and Policy Center, May 7, 2025. See <https://nlpc.org/corporate-integrity-project/nlpc-asks-dominion-energy-shareholders-to-oppose-incentives-for-wind-solar/>.

² Virginia State Corporation Commission. (August 2022). Final Order, Case No. PUR-2021-00142. (Approving initial \$9.8 billion budget).

³ Dominion Energy. (October 31, 2025). Q3 2025 Earnings Report and Project Update. (Updating CVOW capital cost to \$11.2 billion citing tariffs and interconnection).

even account for the \$715 million Dominion spent on its “Jones Act-compliant” vessel, the *Charybdis*, a specialized ship whose costs are being juggled between subsidiaries to obfuscate the true capital intensity of this boondoggle.⁴

The “cost-sharing” settlement currently touted by Dominion is a hollow protection. With the project now in the “shared risk” zone, Dominion is nearly at the threshold where shareholders must absorb 100% of the overruns.⁵ As a result, the company’s fiduciary duty to its owners is now in direct conflict with its service to the public. If this project continues to spiral, the pressure on the SCC to bail out the utility through further rate hikes will be irresistible.

The Science of ‘Collapse’

The physics of wind energy are fundamentally incompatible with the reliability requirements of the 21st-century grid—particularly for Virginia’s mission-critical data centers. During the height of winter, wind production frequently collapses. In past cold snaps, offshore output has dropped to near zero, exactly when it was needed most.⁶

To replace the 2.6 GW of nameplate capacity CVOW claims to provide, one could build roughly 1.5 GW of high-efficiency, combined-cycle natural gas plants. These plants would occupy less than one square mile of land, compared to the 176 square miles of ocean required for CVOW.⁷ More importantly, gas plants provide “firm” power that doesn’t vanish when the wind stops blowing. Dominion’s insistence on intermittent wind is not a scientific choice; It is a regulatory rent-seeking strategy designed to capitalize on mandates embedded in the Virginia Clean Economy Act (“VCEA”).

The Threat to the North Atlantic right whale

As we detail in our March 2024 lawsuit, CVOW is a grave threat to the North Atlantic right whale.⁸ We, along with our co-plaintiffs, the Committee for a Constructive Tomorrow and the Heartland Institute, allege that the Bureau of Ocean Energy Management (BOEM) and the National Marine Fisheries Service (NMFS) illegally approved CVOW at the behest of the Biden administration by ignoring glaring and

⁴ Dominion Energy Investor Relations. (2024). Blue Ocean Energy Marine Subsidiary Filings. (Detailing the \$715M construction of the *Charybdis*).

⁵ Paul Chesser. “Trump Admin Pauses Offshore Wind Projects and Dominion’s Costs Will Balloon More,” National Legal and Policy Center, Dec. 23, 2025. See <https://nlpc.org/corporate-integrity-project/trump-admin-pauses-offshore-wind-projects-and-dominions-costs-will-balloon-more/>.

⁶ PJM Interconnection. (January 2024). Winter Peak Reliability Report. (Noting offshore wind output volatility during high-demand events).

⁷ National Renewable Energy Laboratory (NREL). (2023). Land-Use Requirements for Modern Power Generation. (Comparing 43 acres/MW for wind vs. ~0.15 acres/MW for natural gas).

⁸ “Groups Sue to Stop Offshore Wind Mega-Project That Threatens Endangered Whale Species,” National Legal and Policy Center, March 18, 2024. See <https://nlpc.org/featured-news/groups-sue-to-stop-offshore-wind-mega-project-that-threatens-endangered-whale-specie/>.

obvious procedural errors in the permitting process. The North Atlantic right whale is an endangered species, with only about 340 remaining.

The 90-Day Warning Shot

The Department of the Interior's December 22, 2025 issuance of a 90-day "national security" pause on CVOW should be the final nail in this project's coffin. Whether the concern is radar interference for our military installations or the vulnerability of large-scale offshore infrastructure to adversary technology, the federal government has finally acknowledged what we have said for years: this project is a liability.

Governor, you often spoke about "restoring sanity" to Richmond. There is nothing sane about a project that is \$1.4 billion over budget, provides intermittent power at double the cost of gas, and is currently under a federal security halt. "All of the above" is not a practical energy policy; it is an empty political slogan. Virginians are about to be shackled to the \$11.2 billion "Rider CVOW" on their electric bills.

Dominion Has Corrupted Virginia Politics

As you leave office, there is speculation about how you can best serve our nation in the future. You cannot claim to oppose high taxation, support deregulation, and sing the praises of the free-enterprise system if your legacy is the largest offshore wind farm in the United States. Energy is called the "master resource" for a reason. It is fundamental to all economic activity.

It is regrettable that you have provided so much cover to Dominion Energy, whose CEO is former Democratic operative Robert Blue. As a Dominion shareholder, we have attempted, through the shareholder proposal process, to alert other shareholders to Dominion's massive misallocation of capital to wind and solar. See our Notice of Exempt Solicitation filed with the Securities and Exchange Commission, which details the ideologically driven mismanagement of this utility.⁹

Dominion's massive political contributions to both Democrats and Republican have corrupted the political system in Virginia, allowing for projects like CVOW, which make no economic or environmental sense. Ironically, Dominion funded a false-flag operation calculated to prevent your election in 2021.^{10 11} There is no reason for you to continue to carry their water. This is your last chance to disassociate yourself from the CVOW folly.

⁹ See https://www.sec.gov/Archives/edgar/data/715957/000109690625000521/nlpc_px14a6g.htm.

¹⁰ "Va. Utility's CEO Deceived Employees About Anti-Youngkin Donations," National Legal and Policy Center, Feb. 28, 2022. See <https://nlpc.org/corporate-integrity-project/va-utilitys-ceo-deceived-employees-about-anti-youngkin-donations/>.

¹¹ "NLPC Demands Probe of Va. Utility That Tried to Undermine Youngkin," National Legal and Policy Center, Feb. 1, 2022. See <https://nlpc.org/featured-news/nlpc-demands-probe-of-vu-utility-that-tried-to-undermine-youngkin/>.

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Sincerely,

A handwritten signature in dark ink, appearing to read 'P. Flaherty', with a long horizontal stroke extending to the right.

Peter Flaherty
Chairman