



AMERICANS *for*
RESPONSIBLE
INNOVATION

FIELD GUIDE

FOR CIVIL SOCIETY

Civil Society Organizations

Bring the technical expertise – independent analysis, PUC intervention, public records requests, and community benefit agreements.

BEHIND THE BUILD: GRID MITIGATION & DATA CENTERS · JUNE 2026

CSOs provide the specialized legal, technical, and regulatory expertise that individual citizens often lack. They can serve as effective advocates for responsible data center buildouts.

Identify Risks & Leverage Points

- ◆ **Unpermitted Infrastructure:** Monitor data center energy assets, such as natural gas turbines, which operate without permits or leave communities with unmitigated externalities.
- ◆ **Inadequate Cost-Benefit Analysis:** Use the organization's resources to produce independent analyses on the costs and benefits communities will face as a result of buildouts.

OREGON

The Oregon Citizens Utility Board (CUB) conducted an independent analysis, which revealed that PGE planned to allocate 34-45% of new supply and transmission costs to households despite data centers driving the demand. CUB accused PGE of circumventing Oregon's POWER Act, requiring the PUC to make a final decision on the matter.

- ◆ **Technical Translation:** Articulate complex impacts—such as how transmission upgrades affect energy rates or how 24/7 operations impact local noise and pollutant standards—into clear terms for citizens and government officials.

Master Technical Foundations

- ◆ **Commission Expert Studies:** Fund independent public health, externality, and cost analyses to examine the effects of co-located power plants, onsite generators, and infrastructure upgrade costs on local citizens.

SOUTH MEMPHIS, TN

The South Memphis, Tennessee xAI Colossus data center campus operated 20 unpermitted gas turbines and consumed double its permitted capacity. A CSO commissioned independent flyovers after residents reported gas smells. TIME Magazine journalists also commissioned an independent analysis that revealed a 79% spike in peak pollutants near the facility.

- ◆ **Monitor Legislative Trends:** Track state bills, such as South Carolina's H4583, which aim to assign new infrastructure costs to the data centers rather than the public.

- ◆ **Analyze Data Centers' Energy Use Metrics:** Investigate data centers' reliance on outdated metrics, such as Power Usage Effectiveness (PUE), which fail to capture how facility components, such as IT equipment efficiency and cooling infrastructure, strain local energy resources.

Ask Questions

- ◆ *Have the relevant utilities and public utility commissions conducted cost-causation analyses to determine who is bearing the costs of transmission and grid upgrades for data center buildouts?*
- ◆ *Are new data centers classified as “flexible loads,” and if not, what contingency plans exist in case multiple facilities simultaneously disconnect during peak demand?*
- ◆ *Which data collection tools are available to conduct open-source intelligence analysis on data center developments?*
- ◆ *How can state freedom of information laws be used to surface data center contracts, tax incentive agreements, and non-disclosure agreements?*
- ◆ *How can community benefit agreements (CBAs) be structured to enforce commitments, including local hiring, energy use, and public service funding?*

Formally Intervene

- ◆ **Secure Intervenor Status:** File as a formal intervenor in public utility commission (PUC) proceedings. Intervenor status has the right to cross-examine witnesses and to submit expert testimony as recognized parties, formally amplifying local communities' voices, and ensuring customers receive the safe, reliable, and affordable service they are entitled to.

VIRGINIA

Virginia's Piedmont Environmental Council intervened in a state rate-setting case, submitting expert analyses on transmission costs and data center-driven infrastructure spending. This intervention led to a State Corporation Commission (SCC) ruling acknowledging that data centers are driving massive costs for grid infrastructure, potentially subsidized by ratepayers.

Empower Communities

- ◆ **Draft Community Benefit Agreements:** Help local groups negotiate CBAs that include specific, enforceable commitments for local hiring, noise limits, community investments, upfront financial commitments for grid upgrades, and contingency funds in case of project abandonment.
- ◆ **Develop Coalitions:** Form coalitions with organizations that are aligned on specific issues to maximize advocacy impact.
- ◆ **Coordinate Public Record Requests:** Leverage state-level freedom of information laws to request project documentation, identify stakeholders, and ensure communities have the necessary information to make informed decisions about proposed developments.

ARIZONA

Arizona Luminaria made a public records request and revealed that the final user for a Project Blue data center campus was Amazon Web Services (AWS). Under the NDA, the county agreed not to share the name and, if prompted, to give AWS 10 days' notice to allow AWS to seek protective orders in court.

Additional Resources: [Data Center Regulation Tracker](#) · [Database of Emerging Large-Load Tariffs](#) · [Community Benefit Agreements](#) · [Heatmap](#)