

**INFRASTRUCTURE
EVIDENCE GROUP**

AI infrastructure research and intelligence

FLAGSHIP EVIDENCE BRIEF

What We Know - and Still Don't Know - About Project Camellia

A plain-language review of electricity, water, land, public finance, environmental risk, and the decisions still ahead in Effingham County, Georgia.



Official project-site landscape image. It is not a final site plan or evidence of a constructed campus. Source: ProjectCamellia.com

EDITORIAL POSITION Infrastructure Evidence Group is neither for nor against the project. Our standard is whether benefits, costs, resource demands, and safeguards are supported by evidence and designed to remain sustainable over time.

Prepared by the AI Resource Efficiency Lab

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HOW TO READ THIS REPORT “Officially stated” means a government, utility, or project source made the statement. It does not mean the outcome has occurred. “Established” is reserved for facts supported by current records. Projections remain projections, even when they come from an official source.

Executive summary

BOTTOM LINE Project Camellia is a very large proposed AI infrastructure campus with potentially significant economic benefits and unusually large resource demands. The public record is now strong enough to understand its announced scale, but not yet strong enough to verify several of its most important protections and outcomes.

Project Camellia is being designed and developed for OpenAI in Effingham County. The state DRI record lists four data-center buildings totaling 4.4 million square feet, a peak connected electrical load of 3,210 megawatts, estimated water and sewage demand of 30,000 gallons per day each, and 65% impervious surface. The filing estimates a \$20 billion build-out value and 400 full-time jobs. [1][2][3]

Those numbers are planning representations, not measured outcomes. The project is not operating, and the reviewed public record does not establish that all construction approvals have been issued. DRI #4801 is “Certified Complete,” warrants regional review, and lists September 6, 2026 as the projected process-completion date. County materials say further water, sewer, stormwater, wetlands, utility, erosion-control, building, fire-safety, inspection, and occupancy steps remain. [1][7]

OpenAI and Georgia Power say the project will pay the full infrastructure and electric-service costs required to serve it under a 25-year agreement. Georgia Power says it may reduce service by as much as 1,000 MW during high-demand periods. These are important protections. The public still needs a contract-level or regulatory summary showing minimum payments, financial security, termination protection, cost allocation, and how the flexible load will be tested and enforced. [4][5][11][12]

The closed-loop cooling design may substantially reduce ongoing on-site water withdrawals compared with evaporative cooling. It does not make the campus water-free. The public record still lacks a quantified initial fill, peak-day demand, drought-stage rules, make-up water, metering protocol, and final water-and-sewer agreement. [3][8][15]

Environmental review should extend beyond cooling water. A development with 65% impervious surface can materially change runoff, and the DRI does not provide the site acreage or drainage design needed to translate that percentage into acres and stormwater volume. Backup diesel generators, wetlands, floodplains, noise, lighting, fuel storage, construction traffic, and the project’s electricity-related emissions also require permit-level evidence. [3][16][17]

The economic case may be substantial, but different categories must remain separate. Land-sale proceeds, temporary transfers, recurring taxes, projected sales-tax collections, tax abatements, community benefits, and software credits are not interchangeable. The county says ECIDA will transfer \$30 million annually for three years and suspend its 2-mill levy during the tax-abatement agreement; a September 1 county action is still pending. [9]

The five strongest conclusions today

1. The project’s scale is established well enough for serious planning: 4.4 million square feet and a 3,210 MW peak connected load appear in a filed state record.
2. The project is advancing through review, but “Certified Complete” in the DRI process is not final construction approval.
3. Closed-loop cooling is a credible water-saving design direction, but the measurements and enforceable limits that would prove responsible performance are not yet public.

4. Large-load customer rules create meaningful ratepayer safeguards; the project-specific application of those safeguards remains only partly visible.
5. The public-finance story could be favorable, but one-time land proceeds and projected future revenue must be reconciled in a year-by-year fiscal model.

1. What is reasonably established

The table below separates facts supported by current public records from announcements and unresolved details. Confidence describes the evidence available as of August 26, 2026; it is not a prediction that the project will achieve the announced outcome.

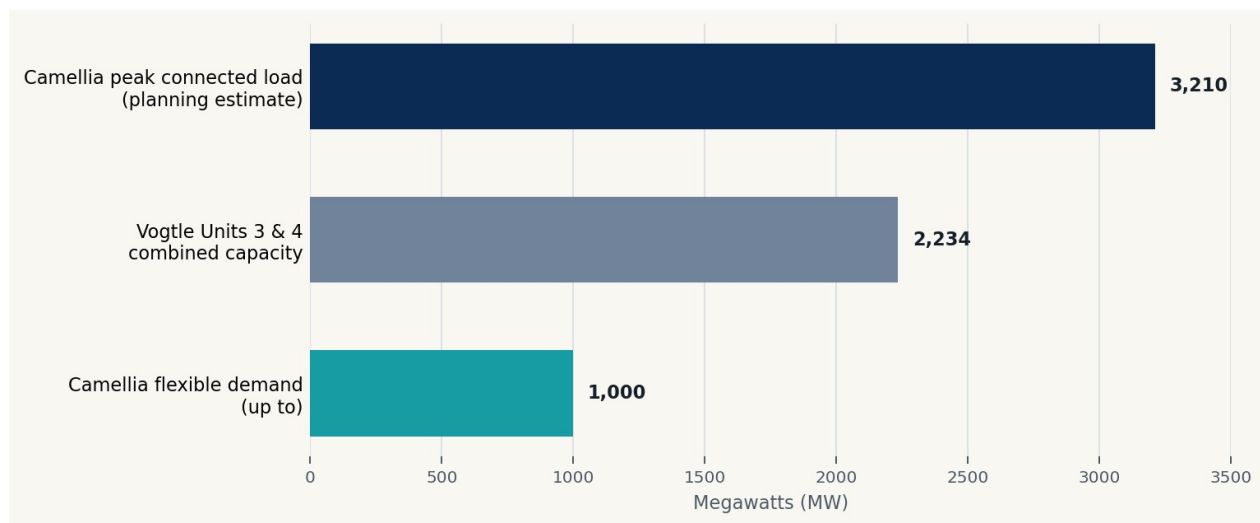
Topic	Current public record	Treatment	Confidence
Project and location	Proposed AI data-center campus in Effingham County; DRI coordinates 32.261081, -81.263903.	Established in filed record	High
Physical program	Four buildings totaling 4,400,000 square feet.	Planning representation	High that filed
Electric scale	3,210 MW peak connected load; 3.2 GW service announced in phases from 2028-2032.	Filed estimate + official announcements	High that stated
Flexible load	Up to 1,000 MW of demand response under a 25-year arrangement.	Utility statement; operating terms unavailable	Medium-high
Water and sewage	30,000 gallons/day each in the DRI.	Planning estimate; basis unavailable	High that filed
Cooling and source	Closed-loop cooling and treated surface water are planned.	Design commitment; not measured performance	High that stated
Land cover	65% impervious surface in the DRI.	Planning estimate; acreage/design unavailable	High that filed
Investment and jobs	\$20 billion build-out estimate and 400 FTEs in the DRI.	Projected outcomes	High that filed; outcome unknown
DRI status	Certified Complete; regional review warranted; projected completion Sept. 6.	Current administrative record	High as of Aug. 26

Sources: [1]-[5], [7]-[9].

IMPORTANT DISTINCTION A filed estimate is evidence that the estimate was submitted. It is not proof that the result will occur or that the underlying calculation is correct.

2. Electricity: what 3.2 GW means

A megawatt measures power at a point in time. A megawatt-hour measures energy delivered over time. The 3,210 MW figure is a peak connected-load estimate, not proof that the campus will continuously consume 3,210 MW. Actual annual energy use will depend on the load ramp, operating profile, efficiency, outages, and curtailment.



Scale comparison only. Connected load and generating capacity are not the same as annual energy use. Source: DRI #4801; Georgia Power

Why the demand-response promise matters

Georgia Power says it can reduce electricity delivered to the campus by up to 1,000 MW during certain high-demand periods. At the full 3,210 MW planning peak, that equals about 31% of the load. Even if the full amount were curtailed, roughly 2,210 MW would remain. That does not make the commitment weak; it shows why the trigger, duration, notice, testing, and enforcement terms matter. [5]

Flexible demand can reduce the amount of generation that must be available for rare peak conditions. Its value depends on when the load can move, how often curtailment can occur, how quickly the campus responds, and whether the reduction is contractually dependable when the grid needs it.

What “paying its own way” should mean

Georgia’s large-load rules allow longer contract terms, minimum bills, financial security, upfront payments for local infrastructure, and termination payments. The PSC also requires new data-center contracts to be provided before execution. These mechanisms are designed to prevent existing customers from paying for facilities built for a large customer that arrives late, uses less power than forecast, or leaves early. [11][12]

The unresolved issue is not whether safeguards exist in general. It is whether the project-specific contract allocates local and upstream generation, transmission, and distribution costs in a way that remains protective across delays, lower-than-expected demand, early termination, and long-lived assets. The reviewed public record does not disclose enough of those terms to verify the full claim.

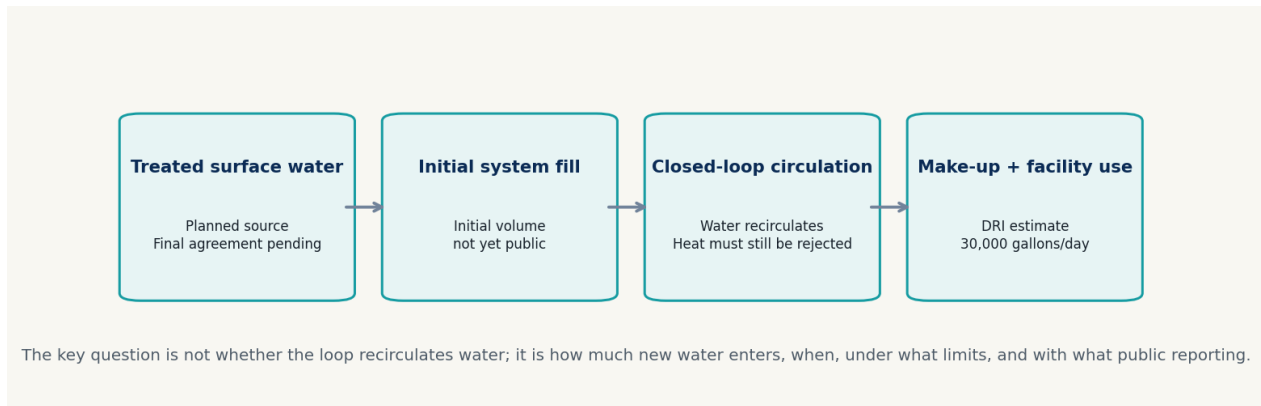
Environmental consequence of the power supply

The campus’s operational carbon and air-quality footprint will depend on the generators that respond to its load, not simply Georgia’s average annual mix. For context, the U.S. Energy Information Administration reports that natural gas supplied 39% of Georgia’s net generation in 2025, nuclear 35%, and coal nearly 14%. No project-specific energy mix or emissions pathway is public in the reviewed record. [14]

SOUND CONCLUSION The flexible-load commitment is a meaningful resource-efficiency tool. It should be evaluated as a measurable grid service, not a slogan: required capacity, event hours, response speed, verification method, penalties, and annual performance should be published.

3. Water and cooling: promising design, missing measurements

OpenAI and county materials describe a closed-loop cooling system that recirculates water rather than continuously withdrawing and discharging it. This can reduce water use compared with cooling towers that reject heat through evaporation. The U.S. Department of Energy notes that cooling can account for a large share of data-center energy use and that water and energy efficiency are connected design choices. [4][8][15]



A neutral reading of the current water claim. The final agreement and operating measurements remain essential. Source: DRI #4801; county statements

What the 30,000-gallon figure does and does not tell us

The DRI lists 0.03 million gallons per day - 30,000 gallons - for both water demand and sewage flow. The filing does not provide the calculation, peak-day value, initial-fill volume, seasonal profile, drought-stage requirements, or division between cooling, sanitation, kitchens, maintenance, and other uses. [3]

Thirty thousand gallons per day would equal about 10.95 million gallons in a 365-day year if the estimate were constant. That arithmetic is not a forecast: actual use may be lower, higher, or more variable. The number is useful because it creates a benchmark that later contracts, meters, and audits can confirm or disprove.

What responsible water governance would include

- A quantified initial fill and normal make-up-water range.
- Average-day, peak-day, and annual limits tied to the phased build-out.
- Drought-stage restrictions and a priority rule protecting community supply.
- Metering at meaningful points, with public monthly or quarterly reporting.
- A clear definition of consumptive use, discharge, reuse, and emergency operation.
- An independent audit whose scope, auditor selection, data access, and correction process are public.

SOUND CONCLUSION Closed-loop cooling is directionally encouraging. The environmental claim becomes verifiable only when the final agreement converts the design into volumes, limits, meters, drought rules, reporting, and remedies.

4. Land, stormwater, air, and other environmental effects

Water use is only one environmental category. A campus of this scale can affect land cover, runoff, wetlands, habitat, traffic, noise, lighting, air quality, and the regional generation system. Compliance with applicable law is necessary, but a data-driven review also asks what the impacts are, how they are minimized, and what performance will be disclosed.

Impervious surface is a material planning fact

The DRI lists 65% impervious surface. Impervious areas - roofs, roads, parking, and hardscape - prevent rainfall from soaking into the ground. The effect depends on total site acreage, soil, topography, detention design, discharge points, wetlands, buffers, and rainfall assumptions. The DRI does not supply enough of that information to calculate runoff volume. [3]

DO NOT OVERREAD THE NUMBER The 65% figure is important, but it cannot be converted into acres from the public DRI alone because the filed forms do not state the project-site acreage. The 2,600-acre Savannah Gateway Industrial Hub is a larger host property, not a confirmed campus boundary.

Backup power and air permitting

The DRI refers to potential backup diesel generators used briefly during grid outages but does not state the number, capacity, fuel storage, testing schedule, or emissions. EPA notes that state and local agencies issue most data-center air permits under Clean Air Act programs. Generator specifications and permit status should be public before operation. [3][16]

Wetlands and aquatic resources

The DRI environmental section states that the project will follow applicable permitting and study requirements, but the reviewed online form does not provide a usable project-specific finding for wetlands, floodplains, recharge areas, historic resources, or other sensitive resources. The U.S. Army Corps of Engineers reviews construction activities in waters of the United States, including wetlands, when federal jurisdiction applies. [3][17]

A practical environmental scorecard

Category	What is public	What would make it measurable
Direct water	30,000 GPD planning estimate; closed-loop design	Final agreement, initial fill, peak use, drought rules, meter data
Stormwater	65% impervious surface estimate	Site acreage, drainage model, detention, discharge, maintenance
Wetlands / floodplain	Permitting commitment only	Delineations, jurisdiction, impacts, mitigation, permits
Air / backup power	Backup diesel acknowledged	Generator count/capacity, fuel, hours, emissions, permit
Noise / light	Not established	Models, limits, setbacks, monitoring, complaint response
Electricity emissions	No project-specific mix	Marginal supply, annual emissions, clean-energy procurement
Construction	Large multi-year build implied	Traffic, road wear, erosion, waste, workforce housing effects

Sources: [3], [7], [8], [14]-[17].

5. Jobs, taxes, and public finance

A project can create genuine public value and still require careful accounting. The central discipline is to keep separate categories separate: private capital investment, land-sale proceeds, recurring taxes, abatements, construction spending, permanent payroll, community-benefit commitments, in-kind credits, and public service costs.

The current headline figures

Figure	What it describes	Correct treatment
\$20 billion	Estimated build-out value in the DRI	Private capital estimate, not public revenue
400 FTEs	Estimated full-time jobs in the DRI	Future employment estimate; wages, timing, residency not stated
\$20 million/year	Estimated annual local tax revenue in the DRI	Applicant estimate; definition and model not public
\$43+ million/year by 2032	County projection across four local sales-tax streams	Projection sensitive to timing, spending and tax rates
\$80 million	OpenAI community-benefit commitment over project life	Separate from taxes; allocation and enforcement pending
\$30 million x 3 years	Announced ECIDA transfers to the county	\$90 million finite transfer tied to land-sale proceeds
About 6 mills	Combined relief described by county	Includes proposed actions; Sept. 1 decision pending

Sources: [3], [4], [9], [10].

Why reconciliation is necessary

The DRI's \$20 million annual local-tax estimate and the county's later projection of more than \$43 million in annual local sales-tax revenue by 2032 may measure different things, different years, or different assumptions. They are not necessarily contradictory, but they cannot both be used responsibly without a bridge explaining tax base, construction spending, taxable purchases, phase timing, abatements, and which governments receive each dollar. [3][10]

The announced \$30 million annual transfers for three years are tied to land-sale proceeds. They may support near-term tax relief, but they are finite. A sustainable fiscal analysis should show what happens after the transfers end, how recurring operating revenue changes through the abatement period, and what new service or infrastructure costs the county, schools, utilities, roads, and public-safety agencies incur. [9]

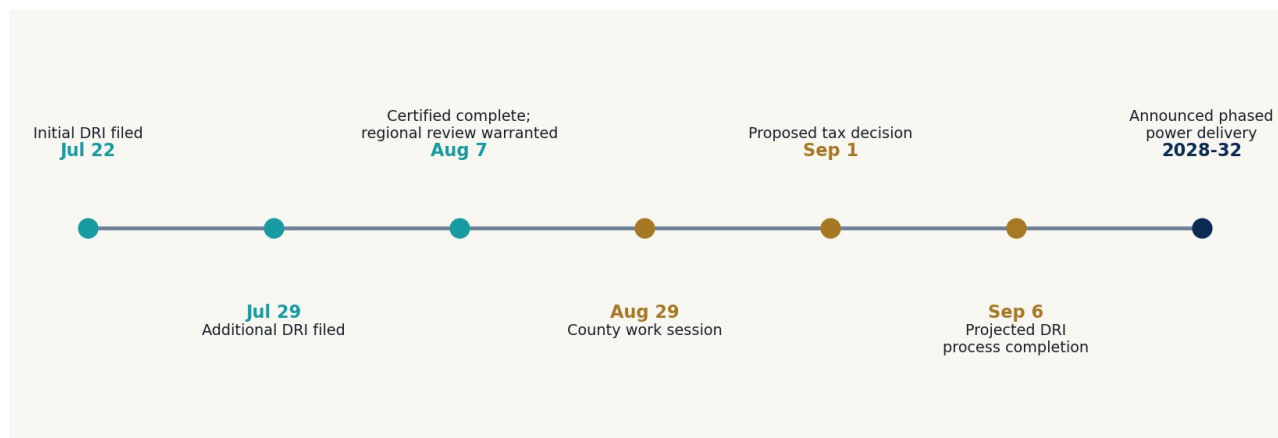
Jobs should be counted as outcomes, not slogans

The filed DRI estimate is 400 full-time employees. OpenAI separately uses broader language about construction and permanent on-site jobs. A credible jobs dashboard would disclose construction versus permanent jobs, direct versus contractor roles, full-time equivalents, wage bands, benefits, hiring dates, residency, local procurement, and retention. [3][4][6]

SOUND CONCLUSION The economic case should be evaluated on net, recurring, verifiable value. Near-term tax relief can be real while still requiring a long-term model that separates one-time proceeds from durable revenue and accounts for public costs.

6. Approvals and decisions still ahead

The state DRI process is an intergovernmental review mechanism, not a construction permit and not the final local land-use decision. DCA says local governments retain decision authority. “Certified Complete” means the regional-review submission is complete enough to proceed; it does not mean all project approvals are complete. [1][19]



Administrative and announced milestones. Future dates are not guarantees. Source: Georgia DCA; Effingham County; OpenAI

Near-term decision calendar

Timing	Expected event	Evidence to capture
August 29, 2026	County work session and public input	Answers and supporting records; not assumed to be a final vote
September 1, 2026	County considers proposed millage reduction	Adopted action, amount, funding source and duration
September 6, 2026	Projected DRI process completion	Regional finding, comments, conditions or schedule change
After regional review	Site, utility and environmental approvals	Applications, staff reviews, permits, conditions and appeal opportunities
Construction phases	Building, fire, erosion and inspection process	Issued permits, inspection results and certificate of occupancy
2028-2032	Announced phased power delivery	Actual construction, commissioning and metered load ramp

Sources: [1], [5], [7], [9], [19].

What should be published in one place

- DRI forms, maps, agency comments, final regional finding, and revisions.

- Site plans, parcel boundaries, land-disturbance and building permits.
- Water-and-sewer agreement, capacity studies, drought rules, and audit protocol.
- Stormwater, wetlands, floodplain, traffic, noise, lighting, generator and fire-safety records.
- Development, land-sale, tax-abatement, bond, PILOT, and community-benefit agreements.
- A public commitments dashboard with responsible party, deadline, metric, status, and evidence.

7. The questions that matter most now

The following questions are designed to test the project's strongest promises without presuming bad faith or guaranteed success. They can be answered with documents, measurable terms, and time-bound commitments.

Approval status: Which exact approvals have occurred, which remain, and where will the public track each application, staff review, decision, condition, and appeal opportunity?

Electricity infrastructure: Which generation, transmission, substation, distribution, and storage investments are attributable to the project, and who pays each cost under delay, low-load, and early-exit scenarios?

Flexible demand: Is the 1,000 MW figure a tested capability, binding minimum, maximum right, or operating target? How many events and hours are permitted, and what happens if performance falls short?

Water: What are the initial fill, average-day, peak-day, annual, drought-stage, discharge, and reuse figures for each phase?

Stormwater and wetlands: What site acreage underlies the 65% impervious figure, and what are the modeled runoff, detention, wetland, floodplain, buffer, and mitigation results?

Backup power: How many generators are planned, at what capacity and fuel volume, with what annual testing/operation limits and air permits?

Public finance: Can the county publish a year-by-year model reconciling land proceeds, abatements, recurring taxes, sales-tax projections, transfers, school revenue, debt, and incremental service costs?

Jobs: What are the direct permanent jobs by phase, wage range, residency target, contractor share, and annual verification method?

Community benefits: Which \$80 million commitments are cash, services, or in-kind support; who chooses projects; and which terms are enforceable?

Independent audit: Who selects and pays the auditor, what data will be tested, will underlying data be public, and what correction or remedy follows a missed commitment?

OUR STANDARD FOR UNKNOWNNS An unanswered question is not evidence of wrongdoing. It is a research item. We will update the report when a reliable record answers it.

8. A reasonable sustainability standard

Sustainability does not mean opposing growth or demanding zero impact. It means meeting a real need while keeping resource use, pollution, public cost, and long-term risk within transparent and enforceable limits. For a campus at Camellia's scale, good intentions should be converted into operating metrics.

A practical test for Project Camellia

Principle	Plain-language meaning	Evidence that would prove it
Efficient	Uses less electricity, water and land impact per unit of useful computing over time	PUE, WUE, compute/output proxy, peak load, annual energy, water and land metrics
Flexible	Reduces or shifts demand when the grid is stressed	MW available, response time, event hours, delivered performance
Self-supporting	Does not transfer project-specific costs or stranded-asset risk to others	Upfront payments, minimum bills, security, termination protection, cost allocation
Water-responsible	Protects community supply through normal and drought conditions	Caps, source, peak use, drought rules, meters, audit data
Environmentally accountable	Avoids and mitigates impacts; measures what remains	Stormwater, wetlands, air, noise, light, waste, emissions, restoration
Fiscally durable	Produces net recurring public value after temporary proceeds end	Year-by-year revenue, abatements, transfers, service costs, sensitivity cases
Correctable	Publishes data, errors and remedies	Independent audit, public dashboard, correction history, enforcement

The balanced position

Project Camellia could bring large private investment, jobs, public revenue, community funding, and an important new flexible-load resource. It could also require generation and transmission on an extraordinary scale, change land and runoff, create backup-power emissions, and expose public systems to long-lived obligations. Both statements can be true.

The best path is not automatic approval or automatic rejection. It is conditional confidence: allow claims to earn trust through contracts, permits, public data, independent verification, and consequences when commitments are missed.

INFRASTRUCTURE EVIDENCE GROUP POSITION The project should be judged by whether it converts scale into durable public value while measurably limiting resource use and environmental harm. That standard is demanding, neutral, and achievable.

Methodology and confidence ratings

This report was prepared from public records and official project, utility, county, state, and federal sources available through August 26, 2026. It is an evidence review, not a legal opinion, engineering design review, environmental-impact statement, utility prudence determination, or investment recommendation.

Evidence classes

Class	Meaning	Examples
A	Primary enforceable or administrative record	Executed agreement, permit, tariff, order, audited measurement, filed administrative status
B	Primary official statement	Agency, utility, or company statement establishing what was announced or represented
C	Credible independent analysis	Technical or financial analysis with transparent methods and relevant expertise
D	Secondary reporting	Useful context or leads; material claims require primary-source verification
E	Unverified	Rumor, unsupported estimate, incomplete document, or unattributed claim; not published as fact

Confidence language

- High: supported by a current primary record or consistent primary sources.
- Medium: officially stated or plausibly supported, but underlying terms, methods, or measurements are unavailable.
- Low: incomplete, conflicting, indirect, or dependent on material assumptions.
- Unknown: the reviewed public record does not establish the answer.

Editorial safeguards

- We use “announced,” “planned,” “proposed,” or “officials state” when an outcome has not occurred.
- We do not equate connected load with constant consumption or generating capacity with annual energy.
- We do not describe closed-loop cooling as water-free.
- We do not infer campus acreage from the 2,600-acre industrial hub.
- We do not treat tax, job, savings, or community-benefit projections as measured outcomes.
- We preserve conflicts and update the public correction history rather than silently rewriting prior versions.

Prepublication status

This v0.1 draft is complete through August 26, 2026 but intentionally remains prepublication. It should be refreshed after the August 29 county work session, the September 1 tax decision, and any DRI update. Named organizations should receive a fair opportunity to correct factual errors and answer material questions before the public-release version is finalized.

Sources

All links were accessed August 26, 2026 unless otherwise noted. Source numbers correspond to bracketed citations in the report.

- [1] **Georgia Department of Community Affairs.** DRI #4801 Application Summary. [Open source](#)
- [2] **Georgia Department of Community Affairs.** DRI #4801 Initial Information Form. [Open source](#)
- [3] **Georgia Department of Community Affairs.** DRI #4801 Additional Information Form. [Open source](#)
- [4] **OpenAI.** Building AI infrastructure with the Effingham County community, July 22, 2026. [Open source](#)
- [5] **Georgia Power.** Georgia Power to serve OpenAI project in Effingham County, July 22, 2026. [Open source](#)
- [6] **Effingham County.** Press Release: Project Camellia, July 22, 2026. [Open source](#)
- [7] **Effingham County.** Project Camellia resource center and process summary. [Open source](#)
- [8] **Effingham County.** Project Camellia: Water Done Right, August 11, 2026. [Open source](#)
- [9] **Effingham County.** Largest Tax Relief Event in Effingham County History, August 24, 2026. [Open source](#)
- [10] **Effingham County.** Project Camellia: Investment that Stays Local, August 25, 2026. [Open source](#)
- [11] **Georgia Public Service Commission.** Data Center Fact Sheet, March 2026. [Open source](#)
- [12] **Georgia Power.** Data Centers & Your Georgia Power Bill. [Open source](#)
- [13] **Georgia Power.** Plant Vogtle Units 1, 2, 3 & 4. [Open source](#)
- [14] **U.S. Energy Information Administration.** Georgia State Energy Profile. [Open source](#)
- [15] **U.S. Department of Energy.** Data-center cooling efficiency resources. [Open source](#)
- [16] **U.S. Environmental Protection Agency.** Clean Air Act Resources for Data Centers. [Open source](#)
- [17] **U.S. Army Corps of Engineers.** Civil Works Regulatory Program and Permits. [Open source](#)
- [18] **Lawrence Berkeley National Laboratory.** United States Data Center Energy Usage Report: 2025 Update. [Open source](#)
- [19] **Georgia Department of Community Affairs.** Developments of Regional Impact FAQs. [Open source](#)
- [20] **Project Camellia.** Official project information site and fact sheet. [Open source](#)

Corrections and updates

Corrections, additional records, and source submissions may be sent to corrections@infrastructureevidence.com. Material changes will be dated and described in the public update log.

Date	Version	Change	Reason
August 26, 2026	v0.1	Complete prepublication draft based on available public record through August 26.	Initial flagship draft

NEXT VERIFICATION POINT Refresh the report after the August 29 work session, September 1 tax action, and the projected September 6 DRI milestone. The public-release version should identify new records, corrected claims, stakeholder responses, and remaining unknowns.