PUBLIC COMMENT DRAFT

The Compute Stewardship Standard

Version 1.0, Public Comment Draft
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Comment period: 60 days, closing November 3, 2026
Comments: computestewardship.com/comment

How To Read This Draft

This is a scored framework released for public comment and founding member review. It is not yet a certification instrument. No facility has been assessed against it, and none will be until the Council exists as an incorporated nonprofit with an independent board and a seated Certification Committee (see the Governance and Independence Policy).

Thresholds in this draft are set where a well-run facility can reach them today with real effort. They are expected to tighten on the two-year revision cycle, and Section 10 lists the specific numbers we most want challenged. A standard that no facility can meet is a manifesto. A standard that every facility can meet is a directory. This draft aims between those, and we would rather be told where it lands wrong than have it politely ignored.

1. Purpose

To provide independent, audited verification that an AI compute facility operates without depleting the resources of its host region and delivers measurable, ongoing, funded benefit to that region.

Certification produces a public scorecard that enterprises may cite in voluntary sustainability reporting and that host communities may use to hold operators to account.

2. Scope

Applies to facilities at or above 500 kW of IT load hosting AI training or inference workloads, whether colocation, dedicated, or operator-owned.

Certification is granted **per facility, never per company**. No company-wide claim may be made on the basis of a single certified site. In colocation, the facility operator holds the certification; tenants may cite it for workloads physically located there.

3. Definitions

Term	Definition
Facility	A single site with its own utility interconnection, cooling plant, and IT load meter. Campuses with shared plant are assessed as one facility.
IT load	Annual energy delivered to IT equipment, measured at the PDU or equivalent, per ISO/IEC 30134-2.
Host region	The county (or equivalent) containing the facility, plus any adjacent jurisdiction whose water source or distribution grid is materially affected by the facility, as defined in the assessment plan.
Hourly matched carbon-free energy (CFE)	Carbon-free generation matched to facility consumption within the same hour and the same grid region or bidding zone, following the EnergyTag Granular Certificate scheme or an equivalent methodology consistent with the 24/7 Carbon-Free Energy Compact.

Term	Definition
Additive generation	Generation capacity that reached commercial operation no earlier than 36 months before the facility's own commercial operation date, and that was contracted by or because of the facility. Reallocation of existing supply, and unbundled certificates of any vintage, are not additive.
WUE	Water Usage Effectiveness, liters of water consumed per kWh of IT load, per ISO/IEC 30134-9.
ERF	Energy Reuse Factor, the share of facility energy exported for beneficial reuse outside the facility, per ISO/IEC 30134-6.
Potable water	Water drawn from a municipal drinking water system or a source meeting drinking water standards.
Community advisory council	A standing body with a resident majority, independently facilitated, that sets priorities for the regional fund. Defined in Section 8 and in the Certification Process and Assessor Specification.
Matched contribution	A defined percentage of certified compute revenue contributed by the enterprise buyer and matched by the operator, held in a restricted regional fund. Working assumption for comment: 1.0% from each party.
Recognized program designer	Any firm the Council has listed as qualified to design community benefit programs. Listing does not confer any advantage in assessment.
Material misstatement	Any submitted claim that, if corrected, would change the facility's tier or the points awarded in any pillar by 3 or more.

4. Scoring Model

Each pillar is scored out of 25 points, for a total of 100. Tiers are set by total score and by minimum floors in individual pillars, so a facility cannot compensate for ignoring one pillar by excelling in another.

Tier	Total	Pillar floors
Entry	40 or above	Water 10 or above; Energy 5 or above; enrolled in the matched contribution mechanism (item C3)
Provisional	60 or above	10 or above in Water, Energy, and Community; Heat Recovery 5 or above
Full	80 or above	15 or above in every pillar, including measured heat reuse (item H1 at 8 or above)

Lower tiers are not failing grades. They are published as a position on a path, and the scorecard shows where the points were lost.

5. Pillar One: Water Stewardship (25 points)

Item	Requirement	Points
W1	Closed-loop, non-evaporative cooling in normal operation, verified on site	10
	Hybrid system with evaporative trim limited to 10 days per year, disclosed	5
W2	WUE per ISO/IEC 30134-9, published annually, trailing 12 months, at or below 0.10 L/kWh	6
	At or below 0.30 L/kWh	3
W3	Zero potable water for cooling in normal operation. Emergency backup permitted if capped in the assessment plan and disclosed on the scorecard	4

Item	Requirement	Points
W4	Withdrawal source disclosed; projected water demand at full build-out disclosed publicly at least 90 days before the first local approval hearing; documented consultation with the local water authority (meeting record and authority acknowledgment)	3
W5	No discharge requiring an industrial pretreatment permit; discharge records reconciled	2

Evidence: cooling schematics and as-built drawings; water meter data for the trailing 12 months; water withdrawal and discharge permits; water authority correspondence; site inspection of loop integrity, makeup water metering, and any evaporative equipment.

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6. Pillar Two: Additive Energy (25 points)

Item	Requirement	Points
E1	Hourly matched CFE, trailing 12 months, same grid region, at or above 85%	12
	At or above 70%	9
	At or above 50%	5
	Below 50%, or matched only with annual unbundled certificates	0
E2	At or above 50% of matched supply from additive generation	6
	At or above 25%	3
E3	Interconnection terms and the projected load ramp schedule (contracted capacity by year to full build-out) published; projected peak demand disclosed publicly at least 90 days before the first local approval hearing; independent ratepayer impact analysis published; facility bears the full cost of dedicated transmission and distribution upgrades, with no cost shift to residential ratepayers	5
	Analysis published but one of the four conditions unmet	2

Item	Requirement	Points
E4	Documented participation in curtailment, demand response, or grid flexibility programs	2

Evidence: power purchase agreements and their commercial operation dates; hourly consumption and generation data or granular certificates; interconnection agreement and utility filings; the ratepayer impact analysis and its author's independence statement; grid program enrollment records.

Note on the load ramp: electricity service agreements are typically proprietary, and utilities now quote four to seven years to deliver full contracted power in constrained markets. A community cannot assess a facility's impact from its phase-one number. The ramp schedule is the disclosure that matters.

Assessor note: the distinction between additive and reallocated supply is the single easiest claim to overstate. The Energy Analyst verifies commercial operation dates against interconnection queue records and utility filings, not against the operator's summary.

Context for comment: the largest and best-resourced operator in the world reports roughly 66% hourly matching globally and about 70% in North America as of 2024. The 85% band is intended to be reached by only a small number of facilities in this revision cycle.

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7. Pillar Three: Heat Recovery (25 points)

Item	Requirement	Points
H1	Measured ERF per ISO/IEC 30134-6, trailing 12 months, at or above 0.15	15
	At or above 0.05	8
H2	Committed reuse pathway: signed offtake or partnership agreement, funded plan, and defined delivery date within 36 months	5
	Completed feasibility study naming candidate offtakers	2
H3	Export-ready design: liquid cooling with a heat exchanger and tie-in point installed for external reuse	5

Beneficial reuse includes district heating, agriculture, aquaculture, industrial process heat, and municipal facilities. Reuse inside the facility's own envelope does not count.

Evidence: heat export metering; offtake agreements; feasibility study; design drawings showing the export loop; site inspection confirming the tie-in exists and the pipe goes somewhere.

Rationale: closed-loop cooling is becoming standard practice, so water alone will not differentiate for long. Heat recovery is the pillar that keeps the standard meaningful in three years. Almost no US facility currently exports heat, which is why measured reuse is rewarded heavily and readiness is rewarded at all. The 0.15 threshold is expected to rise toward 0.30 in version 2.0.

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8. Pillar Four: Verified Community Benefit (25 points)

What this pillar assesses. Whether a facility's commitments to its host community are real, funded, governed by residents, and kept. Where a community benefit agreement, host community agreement, or community benefit plan exists, this pillar does not judge how it was negotiated; it verifies that it is being carried out: contributions received on the agreed schedule, decisions made by the body the agreement names, results reported in public, and every commitment traceable to a published record. The Council does not draft or negotiate agreements. It is the independent check that the agreement is being honored, which is the function most agreements lack.

Item	Requirement	Points
C1	Standing community advisory council with a resident majority, facilitated by an independent facilitator contracted by the Council, not by the operator or any program designer	5
C2	Participatory needs assessment conducted with the community, following the Council's published needs assessment methodology	4
C3	Enrolled in the matched contribution mechanism under a signed fund agreement, with the operator's matching share committed for all certified revenue	7
C4	Quarterly public impact reporting showing funds received, funds distributed, outcomes against council priorities, and performance against every commitment in any executed community benefit agreement, host community agreement, or community benefit plan, with the agreement itself published	3

Item	Requirement	Points
C5	No nondisclosure agreement covering incentive or subsidy terms with any local government; all incentive agreements publicly accessible	2
C6	Local hiring and contracting commitments with measured, published results	2
C7	Digital access: the needs assessment evaluates broadband availability and affordability in the host region; where a gap exists, the fund rules name digital access as an eligible priority and the facility's fiber route is assessed for public middle-mile use, with results published	2

Note on C7: a data center brings fiber to places that often lack it. The item does not require the operator to become an internet provider; it requires the question to be asked, answered in public, and made fundable.

Explicitly insufficient: one-time philanthropy scores zero. A scholarship or a fire department donation is welcome and irrelevant to this pillar.

Fund structure: contributions are held in a restricted fund at a community foundation or equivalent fiscal agent in the host region, under a fund agreement with the Council. The advisory council recommends distributions; the Council confirms they fall within the fund rules; the fiscal agent disburses. The Council's Community Assessor audits this pillar and has no role in facilitating the council or administering the fund.

Note on NDAs: item C5 follows Microsoft's 2026 decision to end NDAs with local governments and the emerging policy consensus that subsidy arrangements must be public.

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9. Maintenance, Suspension, and Publication

- Annual re-audit, with a full reassessment every third year
- Public scorecard for every certified facility, showing points by item, tier, and the name of any recognized program designer used
- Material misstatement triggers immediate suspension, not a remediation period; the scorecard shows the suspension
- A facility that drops below its tier floor at re-audit is re-tiered, not suspended
- Complaints from residents or local officials are accepted through a public channel and may trigger an unscheduled review

- **Decommissioning and continuity (condition of certification at Provisional tier and above):** the operator files a decommissioning and site restoration plan with financial assurance sized to it, and the fund agreement provides for committed contributions to continue through closure and for the fund's remaining balance to stay in the host region under the advisory council's direction. A facility without a filed plan is capped at Entry tier.

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10. Open Questions for Comment

These are the numbers and definitions we expect to be challenged, and want to be.

1. Is 85% hourly matched CFE the right Full-tier band for this revision cycle, given current North American performance?
2. Is 36 months the right window for additivity, and should the definition require that the facility's load was named in the generation project's financing?
3. Is ERF 0.15 reachable in the US within three years by any facility not adjacent to a district heating network? If not, is export readiness (H3) rewarded enough?
4. Is a resident majority the right composition for the advisory council in regions where the facility is the dominant employer?
5. Is 1.0% from each party the right matched contribution level? What level makes an enterprise decline to enroll?
6. Should colocation tenants be able to earn a tenant-level citation, and on what basis?
7. Is the 500 kW scope floor correct, or should it follow the EU's delegated regulation threshold exactly?
8. Should decommissioning be a scored item rather than a condition of certification, and what form of financial assurance is realistic for a facility whose operating life is uncertain?

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11. Governance

The standard is maintained by the Compute Stewardship Council, an independent nonprofit in formation. Governance, board composition, conflict of interest rules, and the founder's disclosed relationship with a recognized program designer are set out in the Governance and Independence Policy. In summary:

- Founding operator members hold advisory seats on the Standards Advisory Committee and have no deciding vote
- Certification decisions are made by an independent Certification Committee
- Criteria are revised on a two-year cycle with a 60-day public comment period
- No assessor may audit a facility they helped design or advise

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Version History

Version	Date	Notes
1.0 Public Comment Draft	September 4, 2026	Scored framework with referenced methodologies. Supersedes the September 2026 outline draft, which used pass/fail thresholds (90% hourly CFE, 30% heat reuse) that no US facility could meet.
1.0 Public Comment Draft, revised (b)	September 5, 2026	Pillar Four now states plainly that it assesses the execution of community benefit agreements rather than their negotiation, and C4 requires reporting against every commitment in an executed agreement, with the agreement published. Prompted by the enforcement questions left unanswered at the Brookings webinar.

Version	Date	Notes
1.0 Public Comment Draft, revised	September 5, 2026	Four changes prompted by the Brookings Center for Technology Innovation webinar of February 17, 2026 (Turner Lee, West, Turner, Gangas): projected load ramp disclosure added to E3; 90-day advance disclosure of projected water and power demand added to W4 and E3; new item C7 on digital access (C1 reduced to 5 and C3 to 7 to hold the pillar at 25); decommissioning and fund continuity added as a condition of certification in Section 9, with open question 8. The comment window is unchanged.