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From: Chan Park Head of U.S. and Canada Policy and Partnerships, OpenAl

To:

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OpenAl respectfully submits the enclosed proposals to the US Department of Energy as the Department weighs how to leverage its land assets to build infrastructure that will help secure America's edge on Al well into the future. With the Chinese Communist Party (CCP) making fast progress toward its goal of leading the world in Al by 2030, we believe that Al built on a foundation of American soil, American ingenuity, and democratic principles can continue to prevail over CCP-built Al.

Not only is AI too powerful a technology to be led and shaped by autocrats, but the economic opportunity it presents is too compelling to forfeit. Like electricity, AI is a foundational technology that can revitalize the American Dream and catalyze a reindustrialization of the United States – but this will require the federal government to:

Act and invest with urgency. Investment to extend America's current lead in AI will yield tens of thousands of skilled-trade and other jobs; growth in productivity and GDP; a modernized grid including power generated by nuclear energy; and a state-of-the art network of semiconductor manufacturing facilities.

Today, hundreds of billions of dollars in global funds are waiting to be invested in Al infrastructure. If the US does not move fast to channel these resources into projects that support American and other democratic Al ecosystems around the world, the funds will flow to projects backed and shaped by the CCP.

Help make AI available to all. Here is where we can apply lessons learned from the advent of electricity, where the federal government's top-down approach via the Rural Electrification Administration, created in 1935 to ensure that electricity benefited every American community, ultimately came up short in ways that still affect rural areas today.

Ensuring that AI access and literacy are truly nationwide and community-based – as the Trump Administration <u>has called for</u> – will help prepare an AI-ready workforce, the most vital AI infrastructure of all.

Al investment of federal lands could accelerate the infrastructure builds necessary to expand Al availability. Specifically, in the face of a fast-oncoming CCP-backed Chinese Al sector, we believe the US government should:

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- Enable fast, standardized, scalable permit approval processes.
- Invest in frontier technologies like small modular reactors (SMRs) and fusion.
- Provide capital and credit enhancement to drive massive infrastructure investment.
- Invest in, and otherwise enable, an AI-ready workforce.

In 2024, OpenAI submitted comments to the National Telecommunications and Information Administration on the subject of "Bolstering Data Center Growth, Resilience, and Security," and <u>has proposed policies to support</u> a foundational strategy ensuring that investment in infrastructure drives economic growth that benefits all Americans, maximizes AI access and literacy, and protects national security interests by keeping sensitive American data on American soil.

Specifically, we support the solutions this administration has proposed to ensure that sufficient capital flows to building AI infrastructure in the US:

- Investment vehicles like the <u>US Investment Accelerator</u> and a <u>Sovereign</u> <u>Wealth Fund</u>.
- *Government offtake and guarantees* that provide the government with the compute it needs, and signal to markets that the demand will be there for American-developed AI.
- *Tax credits, loans and other vehicles* the US government can direct to provide credit enhancement.

Earlier this year, we <u>launched Stargate</u>, an unprecedented investment in Al infrastructure that will boost local economies and strengthen America's global competitiveness and national security. The first Stargate supercomputing campus is underway in Abilene, Texas, and we're in the process of identifying additional sites in Texas and other states. Each site will house cutting-edge Al supercomputers, spreading Al's benefits and infrastructure across the country.

After launching Stargate, we announced a new kind of partnership — <u>OpenAl</u> <u>for Countries</u> — to help other countries build up their data center capacity and ecosystems of AI start-ups and developers. In exchange, these countries would invest in the Stargate Project – and thus are investing in America and in AI led by American companies and built on democratic rails.

In addition, we have proposed infrastructure initiatives to encourage investment and expedite approvals for AI infrastructure, such as:

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- A Compact for AI among US allies and partner nations that streamlines access to capital and supply chains in ways that support AI infrastructure and a robust AI ecosystem.
- *AI Economic Zones* created by local, state and the federal government, together with industry, to speed up the permitting for building AI infrastructure like new SMRs and solar arrays.

We also have proposed a <u>Nationwide AI Readiness Strategy</u> to help our current workforce and students become AI-ready, bolster the economy and secure America's continued leadership on innovation.

And we <u>have launched the OpenAI Academy</u>, a comprehensive program of in-person and <u>online trainings</u> available to all for free. Launched with in-person trainings in fall 2024, the OpenAI Academy expanded to online trainings in March 2025. In the month since that launch, more than 1.2 million Americans across all 50 states have visited our online AI training hub, and more than 320,000 have joined.

America knows how to think big, build big, and act big. Our ability to envision and raise incredible infrastructure has been central to our country's success. From the transcontinental railroad to the interstate highway system, to the internet and the information superhighway, American builders have paved the way to scale commerce, mobility, and economic opportunity and growth. With Al infrastructure, we can scale human ingenuity itself.

We appreciate the Department's consideration and would welcome the opportunity to further discuss with you the proposals outlined below.

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Specific Policy Proposals

Development of a Public Solicitation of Private-Sector Proposals for Al Infrastructure Construction, Operation, Maintenance, and Decommissioning on Federal Land

OpenAl maintains deep, mission-driven collaborations with the US National Laboratories. In January 2025, <u>we launched a multi-year partnership with Los</u> Alamos National Laboratory (LANL) to supercharge national science by:

- Accelerating the basic science that underpins US global technological leadership.
- Identifying new approaches to treating and preventing disease.
- Enhancing cybersecurity and protecting the American power grid.
- Achieving a new era of US energy leadership by unlocking the full potential of natural resources and revolutionizing the nation's energy infrastructure.
- Improving US security through improved detection of natural and man-made threats, such as biology and cyber, before they emerge.
- Deepening our understanding of the forces that govern the universe, from fundamental mathematics to high-energy physics.

LANL Director Thom Mason has called this partnership "a watershed moment for mission science."

We followed the announcement of our partnership with LANL with a catalyzing role in the inaugural <u>"1,000 Scientists AI Jam Session,"</u> through which researchers from nine national laboratories assembled for an intensive sprint to experiment with OpenAI models and prototype AI-enabled solutions to some of the nation's toughest scientific challenges. As Secretary Chris Wright said of that event: "One of our country's greatest assets – and an envy of the world – is the Department of Energy's network of national laboratories, which for decades have driven breakthroughs in science and technology, strengthened national security, and fueled American prosperity. Like the Manhattan Project, which brought together the world's best scientists and engineers for a patriotic effort that changed the world, AI development is a race that the United States must win. Today's collaboration of America's national labs and technology companies is an important step in our efforts to secure America's future."

These inaugural wins demonstrate how pairing national scientific talent and supercomputing infrastructure with OpenAI's world-leading AI models can

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unleash national science and unlock new avenues of inquiry. In responding to this RFI, we recognize the same – that associating industry supercomputer infrastructure with the talent and unparalleled scientific resources of our national labs has potential to expand our synergies, thereby catalyzing American innovation, strengthening national security, and delivering durable economic growth in American communities.

Site Information and Considerations

In selecting sites for AI supercomputer infrastructure, some of our essential considerations include:

Acreage: Adequate space of at least 300 buildable acres to support scalable, campus-style developments.

Buildability and Geotechnical Stability: Robust geological stability, minimal seismic risk, and manageable environmental hazards to ensure the safe construction and continuous operation of infrastructure over decades.

Water Availability: Reliable access to industrial-scale water resources (raw, recycled, or non-potable supplies) sufficient for advanced cooling systems, with enough headroom to accommodate future technology generations and seasonal peaks—without compromising municipal or agricultural needs. Sites with existing water rights, proximity to reclaimed-water infrastructure, or feasible alternatives such as on-site treatment and reuse are strongly preferred.

Access: Modernized, continuous access to transportation networks (highways, rail, and ports) is critical for transporting heavy equipment and construction materials efficiently.

Local Workforce and Community Support: Regions with skilled labor pools – particularly with respect to construction managers and laborers, electricians, HVAC technicians, plumbers and pipefitters, civil and structural engineers, heavy equipment operators, data center technicians, network engineers, security and cybersecurity personnel, and more are preferred. Community enthusiasm for technological innovation and economic development are also preferred, as we seek to build and foster mutually beneficial relationships with strong, supportive communities.

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We encourage DOE to provide detailed, non-proprietary site data – including topographic and geotechnical reports, as well as regional workforce information – to expedite effective review of opportunities on federal lands.

On- and Off-Site Energy Development

As the Administration has recognized, energy and power are vital to Al infrastructure and the economic development it can bring. Our site-selection process prioritizes near-term power needs – which may be met through grid interconnection where utilities have available power capacity or through co-location of energy generation resources – while also remaining attentive to later deployment of advanced nuclear and enhanced geothermal technologies, which are certain to contribute to long-term American energy abundance.

Federal lands may offer unique advantages in ensuring abundant energy for AI infrastructure, whether by facilitating the co-location of power generation and AI infrastructure or by accelerating the integration of new power sources onto regional grids.

To determine whether to respond to a public solicitation for private-sector proposals for AI infrastructure construction, operation, maintenance, and decommissioning on federal land, we would consider both whether the solicitation offered paths to accelerating permitting and approvals for large-scale power generation, as well as whether expedited paths were available to securing long-lead equipment and/or grid interconnection and transmission capacity.

Streamlined Permitting Processes

Streamlined permitting processes are also essential to enable substantial, timely capital investments in and ultimate construction of AI supercomputer hubs. Whether on or off public lands, accelerated permitting and interconnection through categorical exclusions and programmatic reviews for repeatable deployments; emergency exemptions where warranted and appropriate; shot clocks for assessments and other required processes; and surge staff and prioritization of AI-powered permitting tools across key workflows are essential.

Financial and Contractual Considerations

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We advocate for predictable, easy-to-execute lease agreements, as well as innovative approaches to derisk private investment and accelerate completion of AI supercomputer hubs both on and off federal lands. In particular, the federal government should support the success of newer entrants by offering:

- competitive electricity tariffs tailored to large, stable loads typical of Al data centers
- targeted tax incentives ensuring deductibility of R&D expenses and 100% bonus depreciation for qualified property, and,
- financial instruments to shore up project balance sheets, including fast-to-access low-interest loans, purchase guarantees to anchor revenue streams, and cost-share agreements. For example, an AI Supercomputer loan facility could establish a unified senior-debt facility syndicating capital from multiple agencies and programs and enabling master credit agreements with common covenants, draw schedules, and collateral.

These strategic federal investments and financial mechanisms would not only significantly mitigate risk for private investors, but would also accelerate the deployment of critical AI infrastructure, magnifying overall economic impact for the nation.

Further review of any ultimate public solicitation will be required for an ultimate determination as to whether co-locating our infrastructure on public lands will indeed expedite and facilitate our continued leadership in AI research and development. But we are hopeful that the above considerations will be front of mind as the federal government seeks to expedite progress on construction and completion of the supercomputer hubs and energy generation infrastructure we need for continued American AI leadership.

Shared prosperity is as near and measurable as <u>the new jobs and growth</u> to come from building needed infrastructure. Soon, as our CEO Sam Altman <u>has</u> <u>written</u>, AI will help our children do things we can't. Not far off is a future in which everyone's lives can be better than anyone's life is now.

Revolutionary technology drives advances in infrastructure. Capital flows determine where and how the infrastructure is built. These decisions determine whether a nation leads or lags in technological innovation, often with far-reaching consequences for economic competitiveness and national security. This is why infrastructure is destiny.