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**KENNETH W. COOPER**  
International President

**PAUL A. NOBLE**  
International  
Secretary-Treasurer

August 17, 2023

**VIA EMAIL**

The Honorable Janet Yellen  
Secretary  
U.S. Department of the Treasury  
1500 Pennsylvania Avenue NW  
Washington, DC 20220

Mr. John Podesta  
Senior Advisor to the President for Clean  
Energy Innovation and Implementation  
The White House  
1600 Pennsylvania Avenue NW  
Washington, DC 20500

**Re: Treasury Department Anticipated Implementation Guidance on the  
Inflation Reduction Act Section 45V Clean Hydrogen Production Tax  
Credit**

Dear Secretary Yellen and Senior Advisor Podesta:

On behalf of the more than 820,000 active and retired members of the International Brotherhood of Electrical Workers (IBEW), I write to express my strong concerns regarding the potential inclusion of additionality requirements within the Treasury Department's anticipated implementation guidance on the Inflation Reduction Act Section 45V clean hydrogen production tax credit.

The use of hydrogen as a low-carbon and environmentally friendly alternative energy carrier and fuel is very promising and has the potential to support 700,000 jobs and generate \$140 billion in revenue by 2030, according to a McKinsey & Company study.<sup>1</sup> As the largest energy labor union in North America, the IBEW enthusiastically supports the development of the hydrogen industry to become a significant source of work for current and future members. Tens of thousands of IBEW members are already on-the-job building and operating carbon-free sources of electricity around the U.S., including at nuclear and hydropower plants. It is critical to IBEW members working at nuclear and hydropower facilities that these sources of clean power generation qualify for the 45V hydrogen production tax credit. The potential inclusion of additionality requirements would endanger the competitiveness of these sources of carbon-free generation and the livelihood of IBEW members.

The men and women of the IBEW are the best-trained and most highly skilled craftspeople in the industry and stand ready to do their part to make America the global leader in hydrogen production. Thank you for your continued support for IBEW members and for the opportunity to provide input on Section 45V implementation.

Sincerely yours,

Kenneth W. Cooper  
International President

KWC:mea

<sup>1</sup> <https://www.nytimes.com/2021/08/12/climate/hydrogen-fuel-natural-gas-pollution.html>