



UNITED BROTHERHOOD OF CARPENTERS AND JOINERS OF AMERICA

Douglas J. McCarron
General President

October 3, 2023

John Podesta
Senior Advisor to the President for Clean Energy Innovation and Implementation
The White House
Washington, D.C. 20220

Re: Clean Hydrogen Production

Dear Mr. Podesta,

Addressing climate change and moving the United States to clean energy is critically important and the United Brotherhood of Carpenters and Joiners of America (UBC) fully supports that effort. However, I strongly believe this should be done in a tactical way. One that does not put our country at a competitive disadvantage globally nor put the burden solely on working Americans.

I'm writing you today to encourage you to support the eligibility of existing nuclear plants to take advantage of the full PTC available in the IRA for clean hydrogen. The Administration has supported a robust buildout of clean hydrogen evening, but realistically these goals can only be met if existing nuclear plants are incentivized to produce carbon free hydrogen.

On September 12 the European Union made changes to their own regulations for clean hydrogen production to include existing nuclear plants, and we shouldn't disadvantage U.S. clean hydrogen production by handicapping ourselves. The E.U. has recognized that creating barriers to using nuclear-based hydrogen makes no sense when a member country is otherwise decarbonizing its power sector by expanding renewables.

Failing to follow suit would hurt our economy and put a disproportional burden on the millions of Americans who work in the building and construction trades. U.S. nuclear companies are ready to invest in equipment and scale up their workforce to allow them to use clean energy to power electrolyzers, but they are waiting on Treasury guidance on section 45V before they can make final investment decisions.

In my view, Congress was clear that an additionality requirement on existing nuclear is not permissible. We are ready to put people to work building and operating electrolyzer technology and all the improvements to the grid that it will require.

On behalf of the more than 500,000 members of the UBC, I urge you to create policy and provide guidance to Treasury that would allow them to do so.

Sincerely,



Douglas J. McCarron

Emailed (John.D.Podesta@who.eop.gov) and mailed