



LIUNA!

August 24, 2023

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The Honorable Janet Yellen
Secretary
United States Department of Treasury
1500 Pennsylvania Avenue, NW
Washington, DC 20220

Dear Secretary Yellen:

It has come to my attention of the possible inclusion of additionality and hourly-matching requirements with respect to the Treasury's upcoming guidance on the Inflation Reduction Act's (IRA) production tax credit (PTC) for clean hydrogen energy. The Laborers' International Union of North America (LIUNA) opposes these proposals as doing so threatens the hydrogen energy industry, our country's push to decarbonize, and our members' jobs within the hydrogen sector.

LIUNA represents over a half million members, many of whom work building our nation's energy infrastructure network. LIUNA members are finding increased demand for their skills in clean-energy industries as a result of the Inflation Reduction Act, including the hydrogen production sector that is subsidized by the PTC under section 45V of the Act. A decision to burden developers with additionality and hourly-matching requirements, however, would have an adverse impact by severely hindering the growth of hydrogen production.

Because of the IRA, we are already seeing massive investments and expansions in renewable energy. More than the construction sector has ever seen before. At the same time, however, renewable projects seeking connection to the electrical grid are faced with permitting and transmission issues. Including additionality and hourly-matching will only exacerbate the challenges to deploying clean, renewable energy rather than speed it up.

Mandating such requirements has never been done before and would arguably be far too difficult to undertake, implement, and integrate in such a short period of time. This is especially true for hourly-matching. Our energy markets are too complex, and applying these two proposed policies cannot be done with a simple flick of a switch. We are years away from such abilities.

The energy sector has been a tremendous job-creator for the construction unions, employing hundreds of thousands of trades men and women across the country. Therefore, at the risk of losing current and future job opportunities in a rapidly

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growing sector that is helping meet energy demands while reducing carbon emissions, I ask that you exclude mandating the additionality and hourly-matching proposals.

With kind regards, I am

Sincerely yours,

A handwritten signature in black ink, appearing to read "Brent Booker". The signature is fluid and cursive, with the first name "Brent" and last name "Booker" clearly distinguishable.

BRENT BOOKER
General President

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