



Sean McGarvey  
*President*

August 9, 2023

Brandon W. Bishop  
*Secretary-Treasurer*

Newton B. Jones  
*Boilermakers*

Frank J. Christensen  
*Elevator Constructors*

James T. Callahan  
*Operating Engineers*

Eric M. Dean  
*Ironworkers*

Mark McManus  
*UA*

Timothy J. Driscoll  
*BAC*

James Williams Jr.  
*Painters and Allied Trades*

James A. Hadel  
*Roofers*

Sean M. O'Brien  
*Teamsters*

Terry M. Larkin  
*Insulators*

Kenneth W. Cooper  
*IBEW*

Kevin D. Sexton  
*Plasterers' and  
Cement Masons'*

Brent D. Booker  
*LIUNA*

Michael Coleman  
*SMART*

The Honorable Janet Yellen  
Secretary  
U.S. Department of Treasury  
Washington, DC 20220

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

Dear Secretary Yellen and Senior Advisor Podesta:

On behalf of North America's Building Trades Unions (NABTU), its fourteen affiliated national and international unions, and the over 3 million construction industry skilled craft professionals we represent, I write to express our strong concerns regarding the potential inclusion of additionality and hourly matching requirements within the Department of Treasury's forthcoming implementation guidance on the clean hydrogen production tax credit under Section 45V as enacted by the Inflation Reduction Act of 2022.

Often referred to as a Swiss army knife due to its ability to be utilized by a variety of end users, the expansion of hydrogen is anticipated by many in the Building Trades to be a job creator on the verge of generational change for our environment and the unionized construction industry. As this Administration endeavors to lead our nation to a clean energy future, the production and use of hydrogen will be critical for decarbonizing a wide swath of industries.

Congress has recognized the distinct worth of this dynamic energy source, supporting the expansion of hydrogen through both the Inflation Reduction Act (IRA) and the Infrastructure Investment and Jobs Act (IIJA). Both pieces of legislation provided a clear outline for federal support and echoed the broad applicability of the industry with no mention of additionality or hourly matching clauses, two concepts which if included, would have drastically altered the legislation.

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To stunt the expansion of this promising industry through the inclusion of additionality clauses or hourly matching requirements will be to directly stifle the creation of good union jobs, hamstring the greening of our grid, and ignore the clear Congressional intent demonstrated through the IRA and IIJA. Talk of the potential of a hydrogen network in this country has gone on for decades, and now is not the time to deny this dream from becoming a reality.

Thank you for your continued support for NABTU's three million members, and 14 affiliated unions who have built this nation, its middle-class, and are dedicated to growing both.

Sincerely,

A handwritten signature in cursive script that reads "Sean McGarvey".

Sean McGarvey  
President