

Congress of the United States

Washington, DC 20515

October 3, 2024

The Honorable Janet Yellen
Secretary
Department of the Treasury
1500 Pennsylvania Avenue, N.W.
Washington, D.C. 20220

RE: REG-108920-24 Proposed Rule

Secretary Yellen:

Thank you for the opportunity to provide comment on the Treasury Department's proposed rule to expand the Low-Income Communities Bonus Credit (LICBC) Program and make reforms to the program for calendar year 2025 and succeeding years. As members of the Sustainable Energy & Environment Coalition's (SEEC) Climate Jobs Task Force, we appreciate Treasury's willingness to take our input into account.

By way of background, SEEC's Climate Jobs Task Force focuses on advocating for pro-worker, pro-climate policies and bringing labor and environmental groups to the table to focus on a just and economically advantageous clean energy transition. Our main topics of engagement include encouraging clean energy workforce development, advancing registered apprenticeship programs and tax credits, improving job quality and density in the clean energy industry, and ensuring energy transition communities are given the proper resources and attention.

We write today to support Treasury's proposed rule to expand the LICBC Program into additional clean energy technologies with a greenhouse gas emissions rate of zero or less. As the Administration revamps the program with additional eligible clean energy technologies, we also encourage you to design the LICBC Program application process in such a way that puts a premium on union clean energy job creation and prioritizes projects that have high labor standards, are compliant with prevailing wage standards and conform to IRA apprenticeship requirements. If finalized, this proposal has the potential to expand opportunities to build and grow clean energy economies in low-income and historically disadvantaged communities with good-paying, union jobs.

As you know, the Inflation Reduction Act (IRA) has already played a historic role in ushering in the next generation of energy workers. According to the Climate Jobs National Resource Center, more than 6,000 utility-scale clean energy projects are either planned, under construction or recently completed that could be eligible for IRA incentives tied to labor standards. These

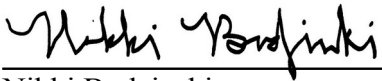
projects are estimated to represent a combined potential of \$2 trillion in public and private sector investment and nearly 4 million jobs.¹

Coupled with the existing tax credit multiplier to incentivize utilization of apprenticeships and prevailing wages, the proposed LICBC Program expansion has the potential to boost the positive impact the IRA is having on our clean energy union workforce.

As members of SEEC's Climate Jobs Task Force, we stand ready to work with the Treasury Department and your partners across the Biden-Harris Administration to continue to expand clean energy opportunities in low-income communities, historically disadvantaged and energy communities. Expanding the LICBC Program into additional clean energy technologies would help expand the workforce opportunities unlocked by the IRA and, as such, we support this proposal.

Again, we appreciate the opportunity to provide feedback on this proposed rule. If you have any questions, please do not hesitate to contact our offices.

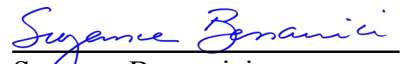
Sincerely,



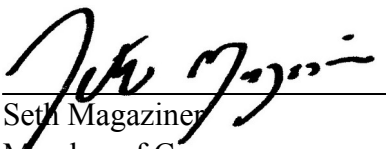
Nikki Budzinski
Member of Congress



Mark DeSaulnier
Member of Congress



Suzanne Bonamici
Member of Congress



Seth Magaziner
Member of Congress

¹ https://www.cjnrc.org/wp-content/uploads/2024/08/FINAL-CJNRC_IRA-Report-_8-13-2024.pdf