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GrowthEnergy.org

November 14, 2022

Mr. Alejandro Moreno
Acting Assistant Secretary
Office of Energy Efficiency and Renewable Energy
U.S. Department of Energy
1000 Independence Avenue SW
Washington, DC 20585
Via e-mail: Cleanh2standard@ee.doe.gov

RE: U.S. Department of Energy Clean Hydrogen Production Standard (CHPS) Draft Guidance

Dear Mr. Moreno:

Thank you for the opportunity to comment on the Department of Energy's Clean Hydrogen Production Standard (CHPS) Draft Guidance. Growth Energy is the world's largest association of biofuel producers, representing 90 U.S. plants that each year produce more than 8 billion gallons of renewable fuel; 106 businesses associated with the production process; and tens of thousands of biofuel supporters around the country. Together, we are working to bring better and more affordable choices at the fuel pump to consumers, improve air quality, and protect the environment for future generations. We remain committed to helping our country diversify our energy portfolio in order to grow more jobs, decarbonize our nation's energy mix, sustain family farms, and drive down the costs of transportation fuels for consumers.

While we note that this guidance is primarily in response to the requirements of the Bipartisan Infrastructure Law, the document goes on to state, "The lifecycle target proposed in this draft also aligns with Section 13204 of the 2022 Inflation Reduction Act (IRA), which creates a new 10-year production tax credit (the IRC Section 45V Credit) for 'qualified clean hydrogen' defined with reference to the lifecycle greenhouse gas emissions rate of hydrogen production." Additionally, and of particular interest to our industry, the guidance specifies, "Emissions analysis using a lifecycle system boundary has been demonstrated by DOE and its National Laboratories in previous work [with a footnote directly referencing the GREET Model for Life Cycle Analysis of Greenhouse Gas Emissions from Argonne National Laboratory. 2021 October 28], is aligned with the IRC Section 45V provision in IRA and is aligned with international best practices."

Growth Energy is pleased to see the Department highlight the work of its National Laboratories and specify the use of Argonne National Laboratory's GREET model for the assessment of lifecycle emissions for IRC Section 45V. Our industry strongly supports the use of the most up

to date Argonne National Laboratory GREET model to calculate lifecycle emissions as it is the most effective modeling tool in use today and reflects years of work done by the staff at Argonne. We also urge the Department to continue its work with the Department of Treasury (Treasury) to use the updated GREET model for additional parts of IRA implementation including IRC Section 40B, the Sustainable Aviation Fuel (SAF) credit, and IRC Section 45Z, the Clean Fuel Production credit (CFPC). The use of the updated GREET model is consistent with the IRA and reflects the expertise of Argonne National Laboratories' examination of biofuels. We understand that in the context of the CHPS, the Energy Department intends to use default GREET estimates for a number of parameters. While that approach may be appropriate in the context of the CHPS, we encourage the Energy Department to work closely with Treasury to ensure an appropriate level of granularity is included in the calculation of tax credits in the context of 45Z, in order to fully realize the GHG reduction goals of the IRA.

We look forward to continuing our work with the Department as it implements the climate provisions of the IRA and are happy to discuss how biofuels can help meet the Department's ambitious climate goals.

Sincerely,

A handwritten signature in blue ink, appearing to read "Chris Bliley".

Chris Bliley
Senior Vice President of Regulatory Affairs
Growth Energy