



Section 45V Credit for Production of Clean Hydrogen; Section 48(a)(15) Election To Treat Clean Hydrogen Production Facilities as Energy Property

Thank you for the opportunity to provide comments on the Section 45V credit for clean hydrogen production.

The United Nations [24/7 Carbon-free Energy \(CFE\) Compact](#) is a global group of companies, policymakers, investors, governments, cities and organizations on a mission to realize a 24/7 Carbon-Free Energy future for all. This means meeting every kilowatt-hour of electricity demand with carbon-free electricity sources, every hour, every day, everywhere. The 24/7 Carbon-Free Energy Compact was launched during the High-Level Dialogue on Energy in September 2021, and now has over 147 signatories across public, private, and NGO sectors ¹. Most recently, the United States Federal Government joined the 24/7 CFE Compact as a signatory at COP28 last December.

The Compact is guided by five core principles:

- **Time-matched procurement:** matching hourly electricity consumption with carbon-free electricity generation. Hourly matching helps connect clean energy purchasing to underlying electricity consumption.
- **Local procurement:** purchasing clean energy on the local/regional electricity grids where electricity consumption occurs. This is the only way to drive the electricity-related emissions that a consumer is directly responsible for to zero.
- **Technology-inclusive:** recognizing the need to create zero-carbon electricity systems as quickly as possible. All Carbon-Free Energy technologies can play a role in creating this future.
- **Enabling new generation:** focusing on delivering additional carbon-free electricity to drive the rapid decarbonization of electricity systems.
- **Maximizing system impact:** addressing the dirtiest hours of electricity consumption where the most fossil fuel is used in generation.

These principles are aligned with the proposed rules for clean hydrogen production, which would require local procurement, incentivize new generation, and require hourly matching starting in 2028.

Many Compact signatories have completed market transactions for local and hourly matched clean energy or are helping companies track and manage their clean energy purchasing on an hourly basis. Those signatories would be open to share their experiences with the U.S. Government to support the implementation of the 45V rules.

¹ For a full list of Signatories, please see: <https://gocarbonfree247.com/our-signatories/>





As part of the Compact's commitment to achieving 24/7 carbon-free energy for all, the Green Hydrogen Catalogue is now released to the 24/7 CFE Compact. The initiative was started to expand the use of green hydrogen technologies in energy production. The Green Hydrogen Catalogue provides a platform for collaboration between governments, international organizations, and private sector companies involved in the green hydrogen value chain. This integration makes explicit the importance of 24/7 CFE - local procurement, hourly matching, and enabling new carbon-free energy generation - to the production of green hydrogen.

We appreciate the opportunity to provide comments and stand ready to support the implementation of US policy on this matter.

