

November 4, 2022

Internal Revenue Service
Department of Treasury
Ben Franklin Station
P.O. Box 7604, Room 5203
Washington, D.C., 20044

Re: Request for Comments on Prevailing Wage, Apprenticeship, Domestic Content, and Energy Communities Requirements – Notice 2022-51

Dear Secretary Yellen and Commissioner Rettig:

We write on behalf of Central Coast Community Energy, Clean Power Alliance, East Bay Community Energy, MCE, San Jose Clean Energy, and Silicon Valley Clean Energy to comment on the Treasury Department and Internal Revenue Service's Notice 2022-51.

We are a collection of California-based Community Choice Aggregators (CCAs), collectively serving 4,345,215 customers across 14 counties. In California, CCAs serve more than 200 communities, more than 11 million customers, and represent 33% of the load in the state. CCAs are public agencies formed by one or more local governments to procure electricity and advance clean energy on behalf of our customers. CCAs reinvest in our communities through a wide variety of programs, with many focused on decarbonizing buildings and transportation. The Joint CCAs are also committed to providing renewable, affordable, and accessible power to our local communities, and accelerating the decarbonization of the grid in California. We are pleased to offer the following comments on the Notice:

Credit Enhancements

.03 Domestic Content Requirements

5. Please provide comments on any other topics relating to the domestic content requirements that may require guidance.

The joint CCAs are also very supportive of the focus on domestic content requirements through the IRA. However, there are limitations on the speed and scale of repatriating domestic manufacturing required to accelerate the

transition to a low carbon economy. It is imperative that the domestic content requirements are phased in a timely manner such that domestic manufacturing can scale to meet the demand for renewable energy - and the need to address climate change - without causing inflationary pressure on the goods being sold to American businesses and citizens. We request that the federal government consult with industry to understand domestic content limitations and timing to bring manufacturing back to the Nation such that there is a smooth ramp, continued progress on decarbonization, and limited inflationary pressure on pricing.

Thank you for considering our comments. We look forward to continuing to work with the Treasury and IRS on implementation of this historic investment in clean energy and decarbonization.

Sincerely,

Brian Kimball
General Counsel
Central Coast Community Energy

Ted Bardacke
CEO
Clean Power Alliance

Nick Chaset
CEO
East Bay Community Energy

Dawn Weisz
CEO
MCE

Lori Mitchell
Director
San Jose Clean Energy

Girish Balachandran
CEO
Silicon Valley Clean Energy