

Comment from Advanced Rail Energy Storage (ARES)

Please see attached the comments of Advanced Rail Energy Storage (ARES) on Notice 2022-51, Request for Comments on Prevailing Wage, Apprenticeship, Domestic Content, and Energy Communities Requirements Under IRA 2022.

**Response to Treasury Department and Internal Revenue Service
On Notice 2022-51, Request for Comments on Prevailing Wage, Apprenticeship,
Domestic Content, and Energy Communities Under IRA 2022**

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With respect to the Department and the Service's request for comments on the following specific issues under Notice 2022-51:

“0.2 Apprenticeship Requirement

...

(2)(c) Are there existing methods to facilitate reporting requirements, for example, through current Davis-Bacon reporting forms, current performance reporting requirements for contracts or grants, and/or through DOL's Registered Apprenticeship Partners Information Management Data System (RAPIDS) database or a State Apprenticeship Agency's database?”

ARES Response: ARES fully supports the apprenticeship requirement, as well as the use of existing methods to facilitate reporting requirements.