

September 3, 2021

The Honorable Nancy Pelosi  
Speaker of the House  
U.S. House of Representatives  
Washington, D.C. 20515

The Honorable Chuck Schumer  
Majority Leader  
United States Senate  
Washington, D.C. 20510

The Honorable Richard Neal  
Chairman, House Committee on Ways &  
Means U.S. House of Representatives  
Washington, D.C. 20515

The Honorable Ron Wyden  
Chairman, Senate Committee on Finance  
United States Senate  
Washington, D.C. 20510

Dear Speaker Pelosi, Majority Leader Schumer, Chairman Neal and Chairman Wyden:

We are writing, on behalf of our associations and our members, to support a robust and effective update to the alternative fuel infrastructure tax credit (26 USC §30C) in the Budget Reconciliation package. Specifically, we urge you to add direct payment to the credit, increase its value, and extend its term, consistent with the President's Fiscal Year 2022 Revenue Proposal, to promote the large-scale investment in the electric transportation infrastructure that is needed to transition to e-mobility.

President Biden set ambitious goals of deploying 500,000 charging stations across the country by 2030 and of electrifying half of all new vehicles sold in 2030. Independent experts forecast that attaining the vehicle deployment target will necessitate more than one million charging stations and thousands of hydrogen fueling stations. Your committees are in a strong position to leverage private sector investment to meet these electric transportation infrastructure deployment targets.

We appreciate the efforts of Congress to speed the build out of the electric drive ecosystem, including legislation such as the Securing America's Clean Fuels Infrastructure Act (S. 975), which would replace the §30C tax credit's \$30,000 cap per location with a \$200,000 cap per item of refueling equipment, such as electric vehicle (EV) chargers.

As Congress considers the option for direct payment for critical clean energy incentives, we urge you to similarly add a direct payment option to the alternative fuel infrastructure credit. The nascent electric transportation infrastructure industry, as well as potential station site host owner-operators, such as small businesses, independent fueling station operators, and retail establishments, sometimes lack the tax liability necessary to monetize the §30C tax incentive, and often are not able to access tax equity markets.

We highly support the §30C investment tax credit, which would significantly stimulate and accelerate deployment of EV chargers and hydrogen fueling in the coming years. Investment tax credits have a proven track record of incentivizing private sector investment in clean energy technologies. We support extending and expanding the §30C credit to address the cap on credit value. Doing so would provide long-term stability in a manner that avoids credit qualification requirements that (1) increase the cost of station construction, deployment and operation, (2) add

to the administrative burden at IRS, and (3) ultimately hinder the tax credit's effectiveness in attaining our national EV charging and hydrogen fueling station deployment targets.

The EV charging and the hydrogen fueling industries are evolving rapidly, and new qualification requirements on stations and station technologies have the potential to severely limit the tax credit's effectiveness. Maintaining a commercially-neutral and technology-neutral approach to investment in EV charging and hydrogen fueling stations is critically important to ensure that the §30C tax credit supports the long-term deployment of infrastructure, which is essential to electrifying the transportation sector to meet the president's goals.

We greatly appreciate your work to advance electric transportation through vehicle and infrastructure incentives, and we stand ready to work with you to achieve our shared goals for e-mobility.

Sincerely,

