

**Congress of the United States**  
**Washington, DC 20515**

May 21, 2024

Kelly Cummins  
Acting Director, Office of Clean Energy Demonstrations  
Department of Energy  
1000 Independence Ave SW  
Washington, D.C. 20585

Dear Ms. Cummins,

Thank you for your leadership in standing up the Office of Clean Energy Demonstrations (OCED) at the Department of Energy (DOE) and accelerating our clean energy transition to help us meet our emissions reduction goals. Today, we are writing to respectfully request that OCED publish the projected lifecycle emissions of hydrogen production in each of the seven selected Regional Clean Hydrogen Hubs (H2Hubs). As the Department of the Treasury works on finalizing its guidance for the 45V Clean Hydrogen Production Credit established in the Inflation Reduction Act, the projected lifecycle emissions data from the H2Hubs will help the public and policymakers better understand whether the H2Hubs are bringing us towards our climate emissions reduction goals.

The Infrastructure Investment and Jobs Act (IIJA) expressly required DOE to provide emissions accounting for the H2Hubs. In particular, DOE is required to rigorously account for lifecycle emissions from hydrogen production in the hubs and across the Department's hydrogen deployment activities in accordance with the Clean Hydrogen Production Standard.<sup>1</sup> The IIJA states that DOE's H2Hubs must "demonstrably aid achievement of the clean hydrogen production standard developed under section 822(a) [of the Energy Policy Act of 2005]."<sup>2,3,4</sup> Furthermore, DOE published a paper on assessing lifecycle greenhouse gas emissions in the context of the 45V Clean Hydrogen Production Tax Credit. This paper affirmed that in order to account for both "direct and significant indirect emissions" from hydrogen production, induced grid emissions from hydrogen projects must be taken into account.<sup>5</sup>

On October 13, 2023, OCED published the projected greenhouse gas emissions (GHG) savings from replacing fossil fuels with hydrogen in various end uses, including trucks, power plants, industrial facilities, and others, along with anticipated jobs numbers, and other economic benefits for each of the H2Hubs. However, DOE has yet to publish the projected lifecycle emissions

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<sup>1</sup> [https://www.hydrogen.energy.gov/docs/hydrogenprogramlibraries/pdfs/clean-hydrogen-production-standard-guidance.pdf?sfvrsn=173e9756\\_1#page=2](https://www.hydrogen.energy.gov/docs/hydrogenprogramlibraries/pdfs/clean-hydrogen-production-standard-guidance.pdf?sfvrsn=173e9756_1#page=2)

<sup>2</sup> <https://www.congress.gov/bill/117th-congress/house-bill/3684/text>

<sup>3</sup> <https://www.govinfo.gov/content/pkg/COMPS-10914/pdf/COMPS-10914.pdf>

<sup>4</sup> <https://www.hydrogen.energy.gov/docs/hydrogenprogramlibraries/pdfs/clean-hydrogen-production-standard-guidance.pdf>

<sup>5</sup> [https://www.energy.gov/sites/default/files/2023-12/Assessing\\_Lifecycle\\_Greenhouse\\_Gas\\_Emissions\\_Associated\\_with\\_Electricity\\_Use\\_for\\_the\\_Section\\_45V\\_Clean\\_Hydrogen\\_Production\\_Tax\\_Credit.pdf](https://www.energy.gov/sites/default/files/2023-12/Assessing_Lifecycle_Greenhouse_Gas_Emissions_Associated_with_Electricity_Use_for_the_Section_45V_Clean_Hydrogen_Production_Tax_Credit.pdf)

linked to the *production* of hydrogen in each H2Hub. This information is overdue and critical for us to fully understand the precise climate and public health impacts of the H2Hubs program.

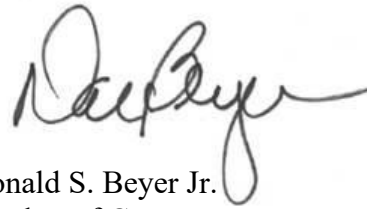
Scientists have warned that high levels of lifecycle emissions from hydrogen production could *entirely cancel out* any climate benefits from replacing fossil fuels with hydrogen. By disclosing only the projected GHG emissions savings associated with displacing fossil fuels with hydrogen, DOE has left out a crucial piece of the story. With billions of taxpayer dollars going to these hydrogen hubs, the public deserves to see the full picture in order to understand whether the H2Hubs will indeed support our decarbonization goals and deliver public health and climate benefits to our communities.

In the interest of increasing transparency around the climate benefits of the hydrogen hubs, we urge OCED to provide within the next two weeks their estimates of the lifecycle, consequential emissions of hydrogen production—including induced grid emissions—in each of the seven selected H2Hubs. Thank you for your thoughtful consideration and timely response to this request.

Very truly yours,



Jamie Raskin  
Member of Congress



Donald S. Beyer Jr.  
Member of Congress