

BCSE Policy Recommendations

to the House Sustainable Energy and Environment Coalition (SEEC) Institute Thriving Economy Project

The Business Council for Sustainable Energy (BCSE) submits these recommendations in response to the House Sustainable Energy and Environment Coalition (SEEC) Institute's Thriving Economy Project. BCSE appreciates the leadership of the members involved in this effort.

BCSE's recommendations are designed to respond directly to SEEC Institute's nine issue areas. They are also designed to advance durable, actionable, nonpartisan solutions that improve affordability, reliability, and economic opportunity.

At the core of BCSE's submission is a foundational principle shared by SEEC Members: Policy certainty enables investment, lowers costs for families and businesses, and strengthens U.S. competitiveness.

Cross-Cutting Principle: Policy Certainty as an Economic and Governance Imperative

BCSE Recommendation:

Congress should prioritize durable policy design, timely implementation, and accountable federal processes to ensure government delivers results for communities, workers, and ratepayers. Areas of priority for BCSE include congressional action on permitting reform legislation, appropriations, and tax policy to continue the growth of clean energy and provide for U.S. energy abundance in this era of increasing energy demand and load growth.

Supports Issue Area 9: Government That Delivers

Recent federal policy disruption – including rapid regulatory changes, delayed tax guidance, permitting bottlenecks, and implementation uncertainty – has increased project risk, slowed deployment, and raised consumer costs. Regardless of technology or geography, predictability and institutional performance are prerequisites for a thriving economy.

BCSE seeks bipartisan action on permitting reform legislation to address the lack of coordination among agencies, delays due to lawsuits, and challenges with the lengthy federal process to receive approval for necessary building permits.

Adequate federal funding for U.S. Department of Energy (DOE) programs, as well as other programs such as Energy Star at the U.S. Environmental Protection Agency (EPA), is essential in FY2027 and in future years. This federal funding is key to maintaining U.S. energy security, fostering innovation, driving economic growth and local investment, strengthening the electric grid, reducing energy costs for consumers, and maintaining U.S. competitiveness in the global energy sector.

Successful tax policy is vital for reducing project costs, stimulating private investment, and accelerating technological adoption through mechanisms such as consumer-facing energy efficiency tax credits and investment and production tax credits (ITC/PTC). These incentives improve competitiveness, drive job growth, and provide necessary financial certainty for long-term sustainable projects.

One example of such a targeted tax policy is the CIRCUIT Act (H.R. 4128 and S. 448), which tackles a specific problem in the electrical grid supply chain: long production backlogs for distribution transformers.

Additionally, SEEC Institute should consider changes to existing tax programs such as 45X, 45Y, and 48E that have proven their worth in expanding grid capacity and reliability but face looming sunsets of certain benefits.

The Business Council for Sustainable Energy (BCSE) is a coalition of companies and trade associations that deploy clean energy and decarbonization solutions, with a sector focus on energy efficiency, natural gas, and renewable energy.

Members include investor-owned utilities, public power, independent power producers, project developers, technology providers, equipment manufacturers, environmental and energy market service companies, and more.

1 21st Century Agricultural Opportunities

Policy Priorities:

- Support dual-use energy strategies such as agrivoltaics, on-farm efficiency upgrades, and methane management.
- Preserve fuel- and technology-neutral incentives that allow farmers to choose cost-effective solutions.
- Enable grid and storage investments that stabilize rural electricity costs and support modern agricultural operations.
- Expand opportunities for conduit hydropower technologies in existing water delivery infrastructure.

2 Growing Rural Economies

Policy Priorities:

- Expand access to low-cost federal financing for rural efficiency, grid upgrades, and storage.
- Invest in workforce training aligned with grid modernization, advanced manufacturing, renewable fuels, and energy services.
- Support regional planning and cost-sharing models that reduce the burden on rural ratepayers.

3 Thriving, Affordable, and Resilient Communities

Policy Priorities:

- Make energy efficiency and demand-side flexibility key affordability and demand-reduction tools. Create new tax incentives encouraging energy efficiency in homes and buildings, as well as policies requiring updated energy performance levels in federally supported housing and public buildings.
- Encourage fuel-neutral federal energy policy enabling access to affordable fuels in homes and communities.
- Support microgrids, virtual power plants, and resilience hubs for critical infrastructure.
- Ensure communities that reduce peak demand and energy waste share in system-wide savings.
- Reform the Federal Emergency Management Administration (FEMA) to focus on energy resilience and disaster response, including support for states in responding to hurricanes, floods, wildfires, earthquakes, and other hazards. Having access to more energy system resilient facilities with longer term back-up power, efficient HVAC, lighting, and hot water systems offers far greater reliability and durability of service for communities.

4 Safe, Clean, and Prosperous Ecosystems

Policy Priorities:

- Advance collaborative land-use planning to identify low-conflict development zones.
- Support early tribal and community consultation.
- Encourage dual-use and low-impact infrastructure that protects ecosystems while enabling clean energy deployment.

5 Cheap, Abundant, and Clean American Energy for All

Policy Priorities:

- Modernize permitting and interconnection with predictable, time-limited reviews.
- Pursue predictability in permitting to enable projects of all types to go forward.
- Accelerate deployment of Grid-Enhancing Technologies (GETs) and digital grid tools, as well as grid-interactive technologies that tap into opportunities to reduce demand from homes and buildings.
- Reform planning and market rules to integrate large loads while protecting existing customers.

- Recognize load flexibility, including flexibility enabled by co-located generation or storage, as a reliability and affordability asset.
- Leverage existing infrastructure to add generation and pipeline capacity wherever possible.
- Prioritize utility-scale long duration energy storage to facilitate clean energy deployment.

According to DOE's July 2025 report on grid stability, there are significant risks to U.S. grid reliability from rising electricity demand, particularly driven by data centers and artificial intelligence (AI) and aging infrastructure. This indicates a pressing need for additional generation. The report warns of a 100-fold increase in blackout hours by 2030 due to insufficient generation to meet growth demand. Without action, the United States is putting its leadership in AI, manufacturing, and economic prosperity in jeopardy.*

As mentioned earlier, bipartisan efforts on permitting reform legislation help address some of the critical needs in this space. The SPEED Act (H.R.4776) is one legislative approach that offers solutions to certain challenges. However, comprehensive permitting reform is needed. Bills such as the bipartisan REWIRE Act (S. 3947), which simplifies reconductoring, need to be part of the overall discussion for permitting reform.

6 Next-Generation Energy Technology Researched, Developed, and Built in America

Policy Priorities:

- Maintain technology-neutral, performance-based incentives.
- Support demonstration and pilot programs for advanced nuclear, geothermal, long duration energy storage, water power, hydrogen, renewable gas-derived fuels, and carbon management.
- Invest in digitalization, AI-enabled forecasting, and system planning tools.
- Fully fund DOE research programs and national laboratories.
- The FY26 DOE appropriations bill included \$375 million to enhance the domestic supply chain for grid equipment. Ensure that such investments, in both FY26 and the future, are targeted toward initiatives that quickly enhance and accelerate the domestic manufacturing capacity of grid components. This will only improve U.S. energy security and grid capacity and reliance.
- Direct regulators to create market rules that properly value reliability, resilience, and capacity services.
- Direct agencies to base resource adequacy assessments on comprehensive, technology-neutral analyses that properly credit reliability contributions and account for all available next-generation technologies.
- Require Independent System Operators (ISOs) and Regional Transmission Organizations (RTOs) to run reliability scenarios that include winter peaks, renewable droughts, and constrained pipeline conditions.
- Encourage the Federal Energy Regulatory Commission (FERC) to include long duration energy storage needs in regional transmission planning and interconnection processes, with explicit modelling of multi-day energy adequacy.
- Incentivize reshoring of critical component manufacturing such as vanadium electrolyte production, iron and zinc cell fabrication, and high-efficiency compressors and turbines.

7 A Nationally Secure, Globally Competitive Energy Sector

Policy Priorities:

- Incentivize domestic manufacturing for products that do not have a readily available domestic supply through tariff offsets such as those proposed by the National Electrical Manufacturers Association (NEMA) to provide targeted, time-limited tariff incentives to offset costs. The NEMA proposal includes:
 - A capital investment incentive that would offer a tariff offset tied directly to investments in new or expanded U.S. manufacturing facilities, available for up to three years after the facility is operational.
 - A grid infrastructure incentive that would provide a tariff offset for goods or materials, such as transformers or

* Resource Adequacy Report: Evaluating the Reliability and Security of the United States Electric Grid. U.S. Department of Energy, July 2025.

cables, necessary to build and operate substations, distribution equipment, and data center electrical systems.

- A domestic manufacturing incentive that would provide a tariff offset for products that meet specific, elevated domestic-content requirements.
- Strengthen critical mineral and component supply chains.
- Improve gas-electric coordination and firm capacity planning for extreme events.
- Increase investments in the U.S. electric grid to address global competition. China currently generates more than twice as much electricity as the United States. Driven by rapid industrialization and aggressive renewable energy expansion, China's power generation, capacity, and transmission infrastructure have far outpaced the U.S. in scale and investment over the past decade.

8 Accessible, Low-Cost Finance for a Clean Energy Future

Policy Priorities:

- Expand DOE loan guarantees, grants, and flexible financing to support the national cleantech innovation ecosystem to ensure that the United States remains economically competitive. Many of these programs now function under the DOE Office of Critical Minerals and Energy Innovation since the recent DOE reorganization.
- Ensure energy tax incentives are clear, administrable, and timely.
- Align financing tools with permitting and procurement timelines.
- Use federal procurement to de-risk markets and accelerate scale.

The One Big Beautiful Bill Act (OBBBA) included several new requirements regarding domestic content and not having prohibited foreign entities in a product's supply chain when accessing certain tax credit programs. It remains critical that the U.S. Treasury prioritize providing timely and clear guidance on how entities can fairly meet new legislative requirements so that these tax programs continue to provide the benefits that help generate a strong and successful U.S. economy.

9 Government That Delivers

Policy Priorities:

- Ensure delivery of timely guidance on tax credits, foreign entity of concern (FEOC) rules, and compliance requirements. It is important to protect long-term business certainty in the tax code. Companies plan with these tax rules in mind and rely upon them for capital allocation, planning, and project commitments. BCSE urges Congress to avoid market disruption.
- Resource agencies to meet statutory deadlines.
- Enable parallel permitting and coordinated federal review.
- Design policies that endure across administrations.

Thank you for the opportunity to share BCSE perspectives on the SEEC Institute Thriving Economy Project. BCSE looks forward to working with Congress to develop durable, bipartisan solutions to achieve U.S. energy abundance. This can be done with a flexible, technology-diverse portfolio that includes energy efficiency, demand-side flexibility, renewable generation, natural gas, advanced nuclear, geothermal, energy storage, and reducing waste.

BCSE's small business division, the Clean Energy Business Network (CEBN), also submitted policy recommendations to the SEEC Institute Thriving Economy Project, which can be viewed [here](#). CEBN encompasses a network of more than 8,000 cleantech business and community leaders across all 50 states.

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