



# CARBON CAPTURE COALITION

## Legislative Work Group

October 8, 2025

## Meeting Notes

### Meeting Summary

The Coalition's Legislative Work Group convened on October 8 to discuss ongoing advocacy and policy developments affecting carbon management priorities amid an extended government shutdown. Coalition staff provided updates on engagement with Treasury, IRS, and EPA regarding the proposed repeal of the Greenhouse Gas Reporting Program (GHGRP), emphasizing the need for interim and permanent solutions to preserve regulatory clarity for 45Q tax credit eligibility. Members also discussed the fallout from DOE's recent wave of confirmed and potential project cancellations—now totaling an anticipated \$23 billion across more than 600 awards—and discussed coordinated congressional and media response strategies. The group also reviewed next steps for the Coalition's forthcoming comments to EPA, as well as new bipartisan legislation to reauthorize PHMSA and direct rulemaking on CO<sub>2</sub> pipeline safety.

### Key-Takeaways

- Coalition met with Treasury and IRS on GHGRP repeal, highlighting the need for regulatory continuity under Subpart RR to maintain 45Q integrity.
- Coalition participated in EPA's October 1 public hearing on the reconsideration of the GHGRP and will file formal written comments before the November 3 deadline.
- A newly circulated list of potential DOE cancellations has expanded to over 600 projects and totals \$23 billion in funding across multiple offices, with major impacts to CarbonSAFE, DAC hubs, and hydrogen hubs.
- Coalition is preparing updated Hill- and media-focused talking points to support members.
- Bipartisan *Pipeline Safety Act of 2025* introduced by Sens. Ted Cruz (R-TX) and Maria Cantwell (D-WA) includes key CO<sub>2</sub> pipeline safety provisions aligned with Coalition priorities.
- Government shutdown persists with limited progress toward reopening; appropriations outlook remains uncertain heading into late October.

### Next Steps

- Coalition staff to circulate draft EPA comments on GHGRP repeal to Legislative and Regulatory & Guidance Work Groups in the coming days.
- Members to provide *initial* feedback on draft comments by Friday, October 17.
- Joint Work Group session to discuss draft comments on Wednesday, October 22; final comments to be filed by November 3.
- Staff to share updated Hill and media talking points on DOE cancellations by end of this week.
- Coalition staff to share pipeline safety memo summarizing CO<sub>2</sub> provisions in the Pipeline Safety Act of 2025.
- Regulatory & Guidance Work Group to meet in November (after the Annual Meeting) for further discussion on pipeline safety.

## Attachments

- [Meeting slide deck](#)
- [Updated list of project cancellations](#)
- [Updated talking points regarding DOE project cancellations](#)
- [Pipeline Safety Act of 2025 - memo](#)
- [Written testimony from the EPA public hearing on Subpart RR repeal](#)

## Meeting Notes

### Housekeeping

- Coalition Annual Meeting – Nov. 6
  - Important dates:
    - Room block ends Monday, October 13
    - Call the hotel or note your preference on Swapcard registration
  - Registration deadline: Wednesday, October 29
- Class VI Work Group – October 23
  - Sign-up was shared via email earlier this week; let staff know if you did not receive
- Next monthly Communications Work Group – October 23

### CCC GHGRP Update

- CCC met with Treasury and the IRS on September 29
  - Met with them just before shutdown
  - In the meeting, both political and career staff were pretty tight-lipped, which is to be expected
    - The fact that there were several high-level appointees signals that they're taking this seriously
  - Discussed how GHGRP underpins the election of 45Q and focused on the importance of subpart RR, specifically
    - Mentioned that we're working to provide model guidance in coming weeks; also discussed immediate issue presented for taxpayers claiming 45Q in 2025
  - Learned in the meeting that Treasury is already in discussion with EPA on this topic, and they also asked us to keep them updated specifically on the timing issue with 2025 taxpayers
  - Receptivity to the challenges of a blanket repeal; creates a regulatory gap for non-EOR sequestration; made case that there will need to be something on an interim basis that taxpayers can rely on, and that we also eventually need a permanent fix
  - They want to get comments as soon as possible
  - Also discussed topline of our previous comments on 2022 enhancements to the credit since it's a new team of politicals
  - Real focus on subpart RR since that's what validates geologic storage for purpose of claiming tax credits; mentioned our support for other subparts and the program broadly, but that subpart RR is most vital for 45Q claimants
  - C: One company expressed that they have to report under subpart C and subpart H

- CCC staff running this thread to ground to better understand the relevance these subparts have on carbon management deployment
- CCC participated in the EPA's virtual public hearing on the proposed repeal on October 1
  - Oral testimony included in attachments
  - Discussed from a high-level how subpart RR and the broader program underpins investments in US projects
- Advocacy update:
  - Continued engagement with congressional champions
    - Particularly Senate Republicans and Senate Finance Committee Republicans
    - Coordinating with various Senate Republican offices as this process continues; encouraging exploration of a strengthened congressional response
      - Offices have noted that they want to be a little more behind the scenes; supportive but conversations around a more full-throated effort continues
  - External stakeholder engagement
    - Talked briefly about a stakeholder letter and a similar effort has begun to emerge from like-minded trade associations and broader stakeholder community around submitting group comment letter **in addition to** individual comment letters
    - Effort has just begun, but we are engaging in those conversations and will let group know how this materializes in coming weeks

#### **Timeline for CCC Comments to EPA**

- CCC staff will share draft comments with Regulatory & Guidance and the Legislative Work Groups in the coming days
  - Recent DOE project cancellations have delayed our timeline a bit, but should have draft of comments for group review by end of this week or beginning of next week
    - We will host another joint work group convening on Wednesday, October 22 to discuss the Coalition's draft comments
  - Once finalized we will also share with interested organizations who are looking to the Coalition on how to respond regarding the 45Q and subpart RR pieces specifically
- Please share initial reactions / comments by **Friday, October 17**
- CCC staff will convene a joint work group session to discuss Coalition draft comments **Wednesday, October 22**
- **November 3: File comments**

#### **Political Landscape**

- Fiscal Year 2026 Appropriations / Government Shutdown
  - Government Shutdown: Day 8
  - Senate has not made any progress on a resolution between the two caucuses on a continuing resolution (CR)
  - Have seen some crossover support from Dems on the GOP-backed CR but not enough to satisfy the 60 vote threshold, with Sen. Paul (R-KY) also voting against most recent proposal

- Both sides comfortable with current positioning; has been back and forth in media on agreement on Affordable Care Act subsidies; a winding road ahead with some sticky points on both sides of the aisle
- As long as healthcare subsidies remain as the main ask, this may drag on a while
- October 15 would be first pay period that troops would miss which might add pressure to reopen
  - Late last week Speaker and Senate Appropriations Ranking Member Murray (D-WA) discussed bringing three bills to floor in minibuss once shutdown resolved
  - Either way burning clock on what House passed with November 21 deadline which shrinks deadline on broader appropriations package
- Funding talks will likely run its course through holidays (not necessarily in full shutdown)
- Bipartisan Permitting Discussions
  - Broader political dynamics make it uphill climb but seeing a lot of proposals/activity in both chambers
  - House has signaled this will be big priority for fall
  - Senate EPW and Senate ENR both been active on this issue throughout the year
  - Complicated given administrative actions by DOE and others which makes a deal on this more difficult
- Q: What's the expectation for length of shutdown?
  - A: Both sides feel they have good arguments and political incentives to maintain stagnation on this, so seems like it has a longer tail rather than shorter tail
  - When things start to move they'll likely move quickly, but longer it goes more tangled it gets since timeline on appropriations gets tighter; seems like it will play out over course of October

### **DOE Cancelled Projects**

- Tranche of \$7.56b in cancellations (223 projects) at DOE announced last week across various program offices, including:
  - Office of Fossil Energy
  - Office of Clean Energy Demonstrations
    - About a quarter of projects cancelled were carbon management
    - We were surprised that these cancellations didn't just impact IIJA and BIL dollars, but that they also affected programs funded through base appropriations
      - House and Senate Appropriators seemed surprised and unhappy about the impact to base appropriations programs
      - Majority staff still not willing to push back in any significant way
      - At time of announcement projects were from states represented by Dems which had a hand to play in congressional response
- Initial states impacted:
  - CA, CO, CT, DE, HI, IL, MD, MA, MN, NH, NJ, NM, NY, OR, VT, WA
- New list circulated Tuesday of this week shows a complete anticipated list of more than 600 project cancellations totaling about \$23b in federal funding

- The list circulated this week has not been confirmed by DOE as a final list of project terminations but does corroborate intel that various folks have gathered over last few months
- List is much more comprehensive; clears out all of hydrogen hubs, two largest DAC hubs, and has additional cuts to CarbonSAFE projects and other carbon management R&D-focused projects
  - Newest list not as targeted to blue states, impacts projects championed by Republican members across both chambers
  - Working to try to mobilize Republican members to pull together congressional response
  - If you have a project on this list we encourage you to be in touch with both DOE **and** your congressional delegation to reiterate how detrimental this would be to economic benefits from your projects
  - Working on updated talking points:
    - The document will contain talking points to use with **both** the media and on Capitol Hill
    - We will share these resources as soon as possible
  - **Have heard overwhelmingly from allies on the Hill and the broader stakeholder community that it is so important to appeal your cancellation**
    - We understand that the process is time-consuming and likely won't yield a change in status, but from our vantage point, without these appeals showing how critical federal support is to garnering outside investment for these projects, it will be incredibly difficult to advocate for federal funding in the future
    - There are also a number of stakeholder groups, including Third Way and Lawyers for Good Government, that are providing technical assistance to folks who want to appeal; happy to put anyone in touch with orgs doing this work if you need assistance
  - Q: Do you see DOE repurposing funding they've taken back for their own energy priorities; what do you think they're going to do with this money?
    - A: DOE cannot technically repurpose the funding beyond its statutory obligation; if they wanted to do that, they would need to retool through legislation

## **PHMSA / Pipeline Safety**

- ***Bipartisan Pipeline Safety Act of 2025 Introduced***
  - Sponsors: Sens. Ted Cruz (R-TX), Maria Cantwell (D-WA), Todd Young (R-IN), and Gary Peters (D-MI)
  - Reauthorizes PHMSA through 2030
  - Requires PHMSA to publish a rule on CO<sub>2</sub> pipeline safety within two years of enactment
    - Fairly succinct section on CO<sub>2</sub> pipelines
    - Memo fleshing out CO<sub>2</sub> pipeline provisions more fully linked above, but at first blush seems to largely be in line with Coalition priorities on first responder/safety training, geohazard considerations, etc.
- **Markup**

- Markup of the bill, originally scheduled for today, is postponed until further notice, do not have a date yet
  - Will let Coalition know when that is rescheduled
  - Coalition intends to provide statement for the record reiterating our priorities on PHMSA and pipeline safety for this markup
- **CCC Regulatory & Guidance WG**
  - Coalition staff will convene a Regulatory & Guidance work group meeting in November, post annual meeting, focused on pipeline safety