



# CARBON CAPTURE COALITION

Legislative and Regulatory & Guidance Joint Work Group

October 29, 2025

## Meeting Notes

### Meeting Summary

The Coalition's Legislative and Regulatory & Guidance Work Groups convened to discuss updates on the Coalition's draft comment letter responding to the Environmental Protection Agency's proposed repeal of the Greenhouse Gas Reporting Program, including Subpart RR and other relevant subparts, recent advocacy with congressional offices and the administration, and the current fiscal and political landscape in Washington. The group reviewed feedback received on the draft comments, outlined next steps for final submission, and discussed broader policy issues, including DOE project cancellations, pending fiscal year 2026 appropriations, and ongoing bipartisan permitting reform negotiations. Coalition staff also shared new member resources and upcoming work group meetings.

### Key-Takeaways

- **Coalition GHGRP Comments:** Members provided substantial feedback on the draft comment letter; final revisions will clarify scope (Subpart RR and related CM subparts), emphasize a delay in repeal until an acceptable replacement is developed, and adjust tone to remain constructive.
- **Interagency Coordination:** Encouragement for EPA to collaborate closely with Treasury on identifying an acceptable GHGRP alternative, if the program is repealed.
- **Stakeholder Alignment:** Coalition opted not to sign a broader industry letter organized by API and the Chamber due to some conflicting positions, though aligned messaging is being incorporated.
- **Advocacy Outlook:** Ongoing engagement with congressional champions. Treasury has responded positively to Coalition engagement on guidance needs.
- **DOE Project Cancellations:** Coalition compiled a detailed spreadsheet on terminated DOE projects; members are urged to engage with congressional offices using provided talking points.
- **Political Landscape:** FY26 appropriations remain uncertain amid shutdown dynamics; bipartisan permitting discussions continue between Sens. Whitehouse and Capito but face timing challenges.
- **New Coalition Work Group:** Second Class VI Work Group meeting to be scheduled.

### Next Steps

- **Monday, November 3:** Coalition staff to **submit final GHGRP comments** to EPA.
- **November 19:** Further discussion on potential **model guidance options** for GHGRP replacement.
- **Ongoing:**
- Members to **conduct outreach to Senate appropriators** supporting inclusion of language addressing DOE project cancellations.

- Members impacted by DOE project terminations should **appeal decisions** and contact **Lawyers for Good Government** for support.
- Members to **share local impacts** of project cancellations with their congressional offices.
- **Second Class VI Work Group** meeting; contact **Leo Duke** to be added to the listserv.

## Meeting Attachments

- [Final CCC GHGRP Comment Letter](#)
- CCC Spreadsheet of DOE Project Cancellations (attached)
- Proposed FY26 Appropriations Language on DOE Project Cancellations (attached)
- [Talking Points on DOE Project Cancellations](#)
- [National Governors Association Permitting Letter](#)

## Meeting Notes

- Housekeeping
  - Coalition Annual Meeting – Nov. 6
    - Important dates:
      - Registration deadline: TODAY
  - Class VI Work Group
    - Second work group: to be scheduled
- CCC GHGRP Updates
  - Coalition staff shared draft comment letter with work groups on October 21, requesting feedback by October 27
    - Huge thanks to all of you who reviewed the draft—we appreciate the time and effort that folks have put into this
    - We received feedback on the draft from multiple organizations that, to some extent, provided relatively similar high-level comments; We tried to take the common threads from that feedback to share with you all today
  - Common points of feedback:
    - Make clear that we are talking about Subpart RR, and other relevant CM subparts (not entire program)
      - Coalition members wanted us to avoid defending entirety of program
    - Emphasize delay of repeal until acceptable alternative identified
      - Alignment on encouraging EPA to work closely with Treasury on finding acceptable alternative if the program is repealed
    - Tone down language that could be seen as combative
      - Certainly not our intent, so will tweak that language while still showing how impactful a repeal of these subparts could be
    - Make connection between Class VI and GHGRP more clear
    - Clarify the role of GHGRP in export markets
    - Q: Are we tracking comments from other relevant stakeholders on this?
      - A: We have been engaging API and US Chamber on repeal; They've organized broad swath of associations for joint comment letter; we engaged in early meetings of those groups

- After we saw outline of their comments, it was clear that they were making certain assertions in comments that would be at odds with previous Coalition positions, particularly on Biden administration's power plan and other hot button issues that we have not forged a consensus position on
    - We opted to stay off comments as signatory, but are incorporating some of their messaging into our comment letter so there is messaging uniformity
  - Q: What is our take on newly announced Carbon Measures Coalition?
    - A: We haven't engaged with them yet, but our understanding is that their focus is a broader scope than the Coalition's; largely about product-level accounting
      - They also have a global focus and are not explicitly zeroed in on the US
  - Advocacy update:
    - Continued engagement with congressional champions
    - Conversations with Republicans continue to be sympathetic but haven't found member offices willing to publicly or forcefully push back; some offices helpful behind the scenes but there's some unwillingness to push back publicly on something like this
    - We have heard that there may be a Senate-focused EPW letter in the works
    - Continuing to keep champions in loop on how things are progressing and urge members to do the same with offices they may have a connection with
- Next Steps
  - Monday, November 3
    - CCC staff file final comments
  - Next Work Group Call:
    - **Discuss potential options for model guidance**
  - Q: Any color on where IRS or Treasury writ large are on this issue?
    - A: Had positive meeting with Treasury, pleased with how receptive they were to our concerns, and highlighted problem and need for guidance in the short term so that 2025 would be addressed, as well as potential for a longer-term fix; they're anxious to get our comments, and seem to recognize that something needs to be done here if repeal moves forward
    - Met with them the day before the shutdown, so there hasn't been further engagement on that front
    - We also know of a number of Senate offices that have been adamant with Treasury that this needs to happen quickly and in consultation with the broader stakeholder community
- Political Landscape
  - FY26 Appropriations/Government Shutdown
    - Hitting some cliffs and pressure points that may change dynamic around nutrition programs and troops salary and similar; so long as neither side sees themselves as losing the shutdown neither has much incentive to

- change position; as pressure mounts on some of those things that calculus may change
  - Elections in Virginia and New Jersey next week may also change things depending on how Democrats do; also CR Republicans have been pushing expires November 21 so would need to pass new proposal if we get too close to that deadline
- Bipartisan Permitting Discussions
  - Reporting that Senator Whitehouse has expressed optimism on where things stand
  - Understand challenge of trying to strike a deal that would get 60 votes in Senate and be acceptable to Republicans in House; timing also complicated by shutdown in terms of when markups or votes on related legislation could take place; waiting to see progress between Sens. Sheldon Whitehouse (D-RI) and Shelley Moore Capito (R-WV)
  - National Governor's Association sent a letter encouraging thoughtful, comprehensive permitting reform
- FY26 Appropriations
  - Senate Energy & Water Bill
    - Funding level dispute between Sens. Susan Collins (R-ME) and John Kennedy (R-LA) may be resolved; have heard in recent days that Sen. Collins acquiesced to Sen. Kennedy's desired funding level
    - Still large swaths of the bill to iron out; open question on path forward
    - Unclear when they'll be able to post bill text and whether or not they will actually mark up the bill; could change quickly but that's where we've heard things generally are on Energy and Water Bill
  - Legislative Text to Address DOE Cancellations
    - Committee staff continue to put pen to paper on the bill; some proposed language floating around for the past couple of weeks that we're hopeful could be included in the final draft text or in a proposed amendment that would void the project cancellations that have been announced by DOE under the basis of a 'agency policy change', but separately maintain cancellations for projects that did not meet expected milestones
      - NGO community has been working to share this language broadly with appropriators
      - Coalition staff have shared with a handful of Republican members of the Committee that we have good relationships with to gauge their interest in supporting language like this including:
        - Sens. John Hoeven (R-ND), Capito (R-WV), Lisa Murkowski (R-AK), John Boozman (R-AR), Deb Fischer (R-NE)
      - A bit of a Hail Mary, but it's definitely an exercise worth doing; welcome any additional advocacy folks in this group would like to do with Senate Republican Appropriators specifically, to show that this language is pragmatic and would simply allow for projects that

have already been properly vetted the opportunity to move forward

- DOE Project Cancellations
  - New resource:
    - CCC staff reviewed all 213 projects listed on the 'leaked' DOE project termination list under the Office of FE and OCED
    - Additional details on these projects have been compiled in a new spreadsheet for CCC members
      - Includes funding source, program area, and classification on these projects
    - Contact Sangeet Nepal with questions (snepal@carboncapturecoalition.org)
  - Advocacy:
    - CCC staff continuing to mobilize champions
    - CCC members should contact member offices in your district and state to share the impact of any specific cancellations
    - Please refer to the talking points circulated earlier this month
  - Q: Any insight on appeals process for terminated grants?
    - A: Included in email from Sangeet, but have been hearing that they have two options; can go through appeals process or accept termination
    - Important to appeal since otherwise it's an acceptance of DOE's decision that can't be challenged later
    - Lawyers for Good Government working on helping companies and organizations with these appeals processes, and can provide insights and assistance