

Legislative Work Group

September 16, 2026



CARBON CAPTURE
IMPACT

Agenda

**Special Guest Speaker: Aaron Goldner, Senate
Energy & Water Appropriations**

Pre-election Updates: KDCR

SEEC Institute's Thriving Economy Project

CCC Updates

Housekeeping

**Special Guest
Speaker:**

**Aaron Goldner, Senate
E&W Appropriations**



**CARBON CAPTURE
IMPACT**

Pre-election Updates



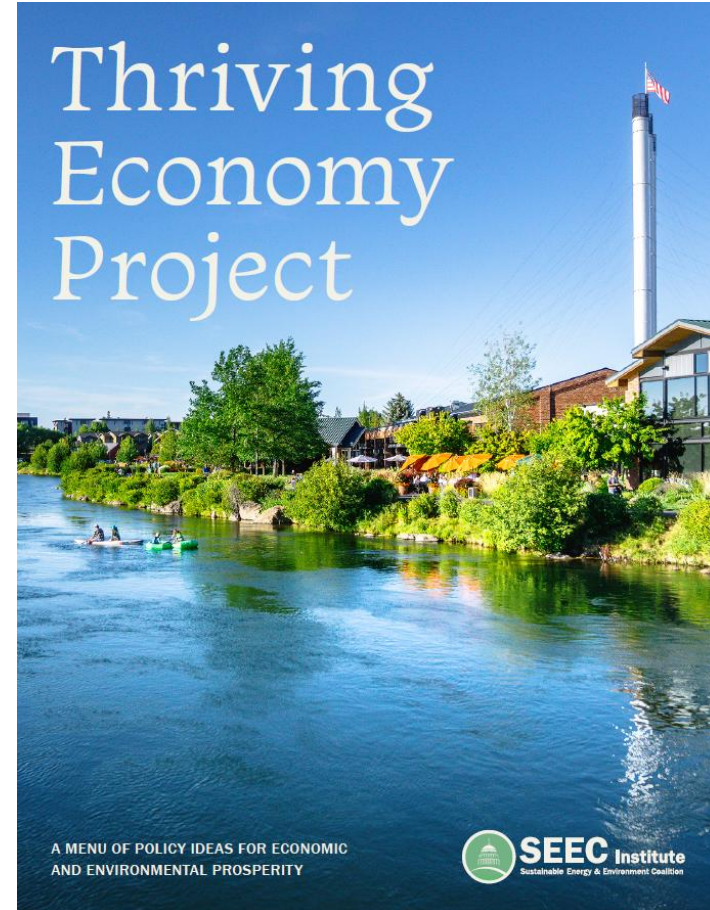
Permitting Discussions

Pre-election List (what's left)

Lame Duck Preview

SEEC Institute's Thriving Economy Project

- Serves as a menu of over 800 energy and environment policy recommendations for Congress to consider for economic growth and affordable, reliable, clean energy
- Impact submitted recommendations in June
- Key carbon management recommendations:
 - Direct PHMSA to finalize updated rulemaking
 - Provide sufficient resources to EPA Class VI program to clear application backlog
 - Restore relevant GHGRP provisions or comparable reporting mechanisms to support public transparency



CCC Priorities: Other Updates

45Q Safe Harbor

- In August, Treasury released updated guidance on the 45Q safe harbor, including:
 - Extension of the safe harbor until further interim guidance or forthcoming proposed regulations are published
 - Clarification of recapture provisions
 - Inclusion of EOR
- The notice did not include a pathway to approve new MRV plans
- **Treasury is requesting comment by October 30 covering:**
 - If the new ISO 27914 is an appropriate alternative
 - Whether there are other suitable alternatives to Subpart RR should GHGRP be repealed

GHGRP

- **EPA published its 111d (power plant rule) repeal on Monday**
- Final GHGRP rule with OMB's Office of Information & Regulatory Affairs
 - Not yet posted on reginfo.gov
- We understand EPA saw 111d as the pre-cursor to GHGRP repeal; could expect it any day

2027 Federal Policy Blueprint

- Topical meetings held over the course of the summer:
 - Transport & Storage
 - Market Development
 - Energy Innovation
 - Investment Certainty
- In-person strategy meeting: September 28
- Impact to begin discussion on formation of the 'Roadmap for Action'
- Share final outline at Annual Meeting
- Publish in February 2027



Housekeeping

- **CCC 2026 Innovation & Policy Forum**
 - Date: October 20
 - Location: Chicago, IL
 - Registration OPEN
 - Optional site visit to ADM on October 21
- **Post-Election Webinar**
 - Tuesday, November 10 @12:30pm ET

