

May 4<sup>th</sup>, 2023

Honorable Jennifer Granholm  
Secretary  
U.S. Department of Energy  
1000 Independence Ave., SW  
Washington, DC 20585

Re: Need for transparency in the implementation of the Infrastructure Investment and Jobs Act (IIJA) hydrogen hubs program

Dear Secretary Granholm:

As a contingent of environmental groups, community groups and environmental justice organizations, we are writing to urge DOE to significantly and rapidly improve transparency in its administration of the hydrogen hubs (H2Hubs) program.

The H2Hubs program will have far-reaching consequences for the trajectory of, and expectations around, the nascent clean hydrogen market. If administered well, the program could help establish a hydrogen market that is aligned with U.S. climate goals, while protecting public health and delivering economic benefits to communities. However, the lack of transparency to date risks undermining this potential and the long-term success of the H2Hubs program.

Maximizing transparency from the outset is central to fostering meaningful community engagement, a core and critical pillar of the H2Hubs program. DOE must ensure that the needs of nearby communities are respected in line with the Administration's commitment to environmental justice. Transparency is necessary to build durable support for the H2Hubs and facilitate the long-term success of hydrogen as a climate solution, including by demonstrating responsible stewardship of taxpayer dollars. But without immediate intervention to elevate and prioritize transparency, the H2Hubs program is at risk of failing each of these aims.

*So far, DOE has failed to meet acceptable transparency standards, foreclosing meaningful community engagement and stoking mistrust in the H2Hubs program.*

**To date, DOE has fallen far short of the requisite level of transparency demanded of the H2Hubs program.** By failing to make available any information embedded in the submitted H2Hubs concept papers as well as failing to provide a list of hubs encouraged to submit full applications, DOE has:

1. Left stakeholders and local communities that will be directly impacted by H2Hubs entirely in the dark about planned projects, with little to no opportunity to meaningfully weigh in on H2Hubs proposals before they are advanced, and
2. Foreclosed any reasonable ability of the general public, as well as the many and varied stakeholders closely tracking this process, to evaluate the degree to which DOE is shaping the program to align promise and potential with actual execution.

Additionally concerning is that DOE has signaled intent to retain this problematic course with respect to the full H2Hub applications that have now been submitted. **This lack of transparency is unacceptable.**

*DOE should urgently course correct to maximize beneficial use of public funds and support the long-term success of H2Hubs.*

DOE should urgently course correct and adopt transparency best practices. **We firmly believe that DOE can successfully balance transparency and confidentiality concerning proprietary information in H2Hub applications.** Specifically, we urge DOE to carry out the practices below prior to selecting H2Hub awardees:

#### **Demonstrate beneficial stewardship of public funds**

- **Publish the list of H2Hubs concept papers submitted**
- **Publish key components of H2Hubs applications:** At minimum, make public the following details from the submitted H2Hub applications:
  - Greenhouse gas emissions and local air pollution expected to be emitted by each facility within the H2Hub, including where those emissions are expected to occur;
  - The lifecycle carbon intensity of the hydrogen resource(s) that will be deployed, together with supporting analytical evidence and planned measurement, reporting and verification practices;
  - Hydrogen end uses targeted by the H2Hub along with analyses demonstrating that end-uses support the most efficient pathway towards U.S. climate goals and that they decrease public health burdens;
  - The locations and communities where hydrogen production, transport, storage, end-use, and any associated infrastructure are proposed to be located; and
  - Community-scale benefits and burdens that H2Hubs expect to result in and plans for providing robust community engagement, transparency, and accountability in hub decision-making and implementation, as outlined in the Community Benefits Plan.

#### **Foster meaningful public and community engagement**

- **Require a public comment period and public hearings prior to awards:** Prior to making any H2Hub awards, require a comment period and public hearings to enable the public—and critically, impacted communities—to provide input. DOE's merit review process is valuable but insufficient given the program's scope and scale and should be coupled with much broader opportunities for input.
- **Increase public engagement in H2Hubs applications and decision-making:** DOE should require H2Hubs applicants to include local community and environmental justice groups in decision-making positions within the H2Hubs governance structure and secure financial resources for local community and environmental justice groups to support such engagement.

#### **Success of the H2Hubs program requires transparency and public trust**

The H2Hubs program constitutes an enormous investment on the part of U.S. taxpayers and its long-term success in supporting climate, health, and equity goals will require robust public inclusion and engagement. We urge DOE to significantly step-up transparency practices while the window of opportunity is still at hand.

Please do not hesitate to reach out to us should you have questions about the items we have put forward.

Sincerely,

350 New Mexico

Beyond Toxics

Citizens Action Coalition of Indiana

Citizens for Pennsylvania's Future (PennFuture)

Clean Air Council

Coalition of Community Organizations

Columbia Riverkeeper

Earthjustice

East Yard Communities for Environmental Justice

Environmental Defense Fund

Illinois Environmental Council

Industrious Labs

Institute for Energy Economics and Financial Analysis

Interfaith Power & Light

Ironbound Community Corporation

Just Solutions Collective

Justice Ministry, St. Paul's United Methodist Church, Allison Park, PA

Kentucky Conservation Committee

MN350

MountainTrue

Natural Resources Defense Council

NC League of Conservation Voters

New Mexico Interfaith Power and Light

New York City Environmental Justice Alliance

NM Conference of Churches

NM Social Justice

Office of Peace, Justice & Creation, Catholic Charities of Gallup Diocese

Pacoima Beautiful

PEAK Coalition

Sierra Club

Tó Nizhóní Ání

West Long Beach Association

Western Resource Advocates

Union of Concerned Scientists

cc: David Turk  
David Crane  
Sunita Satyapal