



December 23, 2025

Re: Public Citizen's Response to the Sustainable Energy and Environment Coalition (SEEC) Institute's [Request for Information](#) Regarding the Thriving Economy Project

Dear SEEC Institute,

Public Citizen is a nonprofit consumer advocacy group with over one million members dedicated to defending democracy, challenging corporate power, and ensuring the government serves the people—not big corporations. Our Climate and Energy Programs challenge fossil fuel interests and advocate for cheap and clean renewable energy solutions needed to remedy the climate crisis. Addressing the climate crisis can and should align with finding solutions for the affordability crisis, ensuring a reliable and resilient clean energy future for everyone.

Below, Public Citizen provides high-level summaries in response to the following topics in the SEEC Institute Thriving Economy Project RFI:

[3. Thriving, Affordable, Resilient Communities](#)

Responding to questions a through i

[5. Cheap, Abundant, and Clean American Energy for All](#)

Responding to questions a, c, and d

[7. A Nationally Secure, Globally Competitive Energy Sector](#)

Responding to questions a through d

[8. Accessible, Low-Cost Finance for a Clean Energy Future](#)

Responding to questions a, b, d, and f through h

[9. Government that Delivers](#)

Responding to questions a through d

While we provide summaries and solutions in response to the questions outlined in the RFI, Public Citizen welcomes continued coordination and collaboration with the SEEC Institute and the Thriving Economy Project. We have expertise related to industrial decarbonization, critical mineral sourcing reforms, utility and electricity markets, the climate-driven insurance crisis, climate-related risk and financial regulation, corporate campaigning, corporate accountability, and more.

Should you want to discuss these ideas further, please reach out to Meghan Pazik, senior policy advocate, at mpazik@citizen.org, who can connect you with relevant staff. Staff contact info can also be found in each question category.

Thank you for the opportunity to share our views.

3. Thriving, Affordable, Resilient Communities

a. How are natural hazards and disasters compounding threats to affordable housing and public safety across the country?

The climate crisis is increasing the severity and frequency of extreme weather events across the country, driving up costs for households, businesses, and governments. With respect to housing, climate change is driving cost increases for property insurance and utilities for homeowners and renters. At the same time, the housing affordability crisis is escalating amid inadequate housing supply and climate threats, compounding the need to promote climate mitigation and climate resilience as it relates to housing affordability. Addressing both climate and housing policies should start with investing in updated building and energy codes and reforming state insurance frameworks—while also effectively integrating these policies at the national level and encouraging states to take up these frameworks.

- **Cost Increases for Property Insurance:** As [climate-driven disaster losses grow](#), insurance companies are raising rates or retreating from geographies altogether – leaving many homes and areas prone to disasters abandoned and without assurances from these disasters. In most states, insurance commissioners are failing to provide meaningful oversight or intervention, often allowing retrenchment without much of a plan on how to maintain affordability and availability for the consumers they serve.

Housing alone has become increasingly expensive. About [50% of renters](#) and roughly [30% of homeowners](#) pay more than 30% of their gross income on mortgages or rent, property insurance, and increasingly higher energy costs. A warming planet also [decreases the reliability](#) of water supply in many parts of the country, [raising water costs](#) for households. Inevitably, this financial strain will continue to worsen without meaningfully addressing the climate crisis.

- **Energy Utility Cost Increases:** An already [strained electrical grid](#) and increasing electrification, especially from increased impacts of data centers,¹ compounds threats to housing affordability as more individuals face higher energy prices. In addition to addressing affordable housing in the context of natural hazards and disasters, we must also consider energy efficiency programs, technologies, and policies as critical tools for addressing increased energy demand and energy burden for households. Supporting local and state [education, utility bill assistance, and low-income housing programs](#) should also be considered for reducing housing and energy burdens for households. We explore the increased impact of electrification and energy bills in question 5.

Additionally, climate mitigation and climate resilience must go hand in hand. Investments in home hardening and building climate-resilient communities and cities must be paired with efforts to reduce emissions and reliance on fossil fuels. Some of those solutions can include:

- **Energy efficiency and Updating Building Codes:** Building codes were outdated in an estimated [65 percent](#) of counties, cities, and towns (according to a 2020 FEMA study), resulting in new houses and apartments that are less safe, less efficient, and more polluting and costly than they should be. Building new homes to old building codes puts residents at greater risk to their own safety and of greater damage to their homes as climate-driven disasters intensify. Energy inefficient homes leave future homeowners and renters paying higher utility bills in homes that are less safe in extreme weather—and they needlessly increase pollution that contributes both to climate change and adverse health outcomes. **Prioritizing energy-efficient home construction and modernizing building energy codes is key to a sustainable and resilient future.**

¹ Data centers, including those used for AI, are increasing energy and water demand on top of baseline energy use for homes and other businesses, further taxing an already strained grid. These systems, plus the climate-controlled buildings which house them, require electricity [24/7](#). The more energy demand placed on the grid, the higher the costs of electricity for homeowners and renters, and the higher the likelihood and frequency of blackouts.

b. What innovative resilience finance models exist to help states, local governments, Tribes, and territories pay for projects that will build community resilience before disasters strike?

Below are a few examples of innovative resilience finance models to help federal, state, and local governments, and Tribes pay for projects to build community resilience before disasters strike:

- **Resilience implementation strategies:**
 - The [Vermont Resilience Implementation Strategy](#) sites existing resilience-related state work, identifying more than 300 resilience-related efforts. The process involved input from the public, municipalities, advocacy groups, and state agencies.
- **Community Reinvestment Acts:**
 - Many states have adopted [State Community Reinvestment Acts](#).
 - For example, the New York Department of Financial Services [industry letter](#) outlines examples of financing activities that support climate resiliency and may qualify for credit under the New York CRA.
 - [Federal Community Reinvestment Act rule](#), currently being [rescinded](#) by the Trump administration. The 2023 rule included “disaster preparedness and weather resiliency activities” as place-based activities that qualified under community development. Future administrations or Congresses should reinstate or codify improvements to the CRA.
- **Financial Regulatory Reforms and Improving Federal Data Systems:** Americans for Financial Reform [outlined](#) various financial policies and practices needed nationwide to reduce household climate vulnerability. Some of those ideas include:
 - Financial regulators need to ensure financial services are fair, especially in how climate risks are managed, including adding specific language about it in their fair lending [assessments](#).
 - Smart development policies that support development away from high-risk areas. [A 2023 survey](#) found that 80% of homeowners would support efforts to restrict development (i.e., not allowing new construction) in storm/wildfire prone areas to reduce rebuilding and repair costs. Financial institutions could prevent future financial hardship and risks to financial stability from climate change by not lending to new developments in the most climate-vulnerable areas.
 - Despite high [demand for growth in some of the counties](#) most exposed to climate-driven disasters, financial institutions should not extend credit, invest, or underwrite developers who are attempting to break ground in those areas unless climate resilience for the duration of a lease or mortgage can be reasonably expected. Financial institutions should not only limit credit extensions for new development when restrained by [government permitting](#) rules or insurance availability, but they should also utilize the plethora of public [modeling](#) available for near-, mid-, and long-term climate conditions across the U.S. in their credit portfolio decision-making.
 - The need for data, including rebuilding and expanding upon climate data systems that may be gone or eliminated post-Trump Administration.
- **[Sustainable Rebuilding](#) or rebuilding contests:**
 - After a tornado destroyed 95% of homes in [Greensburg, Kansas](#), the city committed to [rebuilding sustainably](#) and is now 100% powered by renewable energy.
 - Rebuild by Design’s [Hurricane Sandy Design Competition](#). In 2014, President Obama launched the [National Disaster Resilience Competition](#), which awarded \$1 billion to 13 cities and states across the country to fund resilience-building projects. The competition model’s success also led to the formation of the Rebuild by Design organization, which is helping cities and communities around the globe become more resilient through collaborative research and design.

c. What successful models exist for integrating housing, transportation, and climate adaptation planning, and how can federal policy elevate them?

- Community-led urban development and greening that aims to prevent displacement through measures like community land trusts and rent plus vacancy controls.
 - For example, the Lincoln Institute of Land Policy has an [Equitable Urban Greening](#) model.
- The [Homes Act](#) by Senator Smith offers a new choice for housing—a public option—to meet the needs of people and communities that aren't being served by the private market. These new options would be supported by a housing development authority, which would function as a public bank and developer and work directly with state, local, and Tribal governmental agencies, mission-driven nonprofits, community land trusts and public housing authorities to build, rehabilitate, and maintain millions of sustainable, permanently affordable homes.
- Housing Solutions Lab's [Tools to Promote Climate Ready Housing](#) includes recommendations for city level planning that could be elevated to federal policy.
- Organizations like C40 Cities and National League of Cities are working closely with cities to integrate different financial, governance, and climate models to adopt housing, transportation, and climate solutions. Cities like Boston, Austin, and San Francisco have implemented policies that require building new housing near public transit to reduce car use. Federal models could encourage state and local decision makers in higher-density or climate-prone areas to adopt local climate or sustainability plans to better build with climate adaptation in mind.
 - Additionally, programs under the IRA, like the Climate Pollution Reduction Plans and Implementation Grants (CPRG), gave cities and localities the ability for the first time to create climate action plans. Many of these plans modeled from the requirements of the CPRG gave state and local governments ways to prioritize and integrate solutions across housing, transportation, and climate mitigation and resilience for the first time.

d. How can Congress help communities develop resilience, particularly in the face of extreme weather events?

- **Reform the National Flood Insurance Program (NFIP) to improve insurance affordability, expand coverage, and promote resilience.** Public Citizen signed and supported a September 2025 housing, climate, and consumer [coalition letter](#) to Congress on reform recommendations. Some of those recommendations included:
 - Provide subsidies for low- and moderate-income households
 - Update and modernize flood maps to account for climate change and improve disclosures
 - Expand financial incentives and grants to improve resilience
 - Improve the program's financial position
 - Create an all-peril public option for homeowners insurance
- **[Return funding](#) to NOAA and other agencies.** Return and expand funding to NOAA and other agencies to continue data collection, research, and public mapping and databases for climate and weather data, as well as the [Billion Dollar Weather and Climate Disasters data](#).

Additionally, fund and implement nature-based solutions across agencies that center community needs, environmental justice, and climate adaptation. Many solutions can be found in the [FEMA Nature-based Solutions Guide](#). Expanding funding for community resiliency hubs can also be an effective solution to help communities develop resilience, as seen through the [Building Resilient Infrastructure and Communities](#) (BRIC) Program. Unfortunately, [FEMA in 2025 halted funding](#) and attempted to stop funding previously approved projects so states sued. There is a need to fund—and potentially expand funding—for this program to provide communities needed resources and support to plan, prepare, and recover from extreme weather events.

- **Pass Existing Federal Legislation:** Some legislative efforts are underway to support communities facing extreme weather. Those include:
 - The bipartisan Disaster Mitigation and Tax Parity Act of 2025. This bill would make payments from state-sponsored catastrophe mitigation programs tax-exempt, similar to how FEMA assistance is treated for tax purposes. This is intended to encourage homeowners to make improvements to their property to reduce damage from disasters like windstorms, earthquakes, and wildfires, by ensuring they don't face federal income tax on the grant money they receive. [S. 336/ H.R. 1849](#)
 - The Extreme Heat Emergency Act. The legislation adds “extreme heat” as an eligible natural disaster under the STAFFORD Act. Additionally, fund FEMA and other relevant agencies to prepare, plan, and post efforts to sufficiently respond to extreme heat events. [S.2331/H.R. 4497](#).

e. How can Congress drive adaptation and resilience as key factors in future development?

- Congress should consider recommendations from the [September 2024 Government Accountability Office](#) that describes different ways Congress can drive adaptation and resilience as key factors for future development, especially as it relates to limiting federal fiscal exposure or risk. Some of those recommendations from the report include:
 - establishing a federal organizational arrangement to prioritize climate resilience projects for investment. Such an organizational arrangement could be designed for success by authorizing the five key elements GAO identified in the report;
 - designating a federal entity to develop a national climate resilience strategic plan;
 - establishing and maintaining a national climate information system; and
 - designating a federal entity to develop and support agency use of information on the potential economic costs of climate change.

Additionally, Congress should consider legislation that integrates climate change and climate risk into the economic and fiscal impacts of the US economy.

f. How can the federal government and states better leverage insurance, zoning, and disaster recovery to support community resilience?

- States should streamline and adopt statewide building and energy codes to modern standards:
 - For example, [Illinois](#) and [Rhode Island](#) have statewide energy code requirements that update with the latest IECC model code and [ASHRAE 90.1](#) Standard, plus their state energy codes include voluntary [stretch codes](#) for even higher energy savings.
 - See the Insurance Institute’s for Business & Home Safety website for examples of states with [statewide building code](#) implementation requirements.
- Strengthen and ensure states are adopting the [Strengthen/Fortify grant programs](#). These state programs are funded by the insurance companies operating in the state through surplus insurance department fees on the insurance market, primarily insurance producer fees. Those insurer fees should be raised incrementally over time to allow for the grant program to continue year after year. Grants should provide a baseline \$10,000 grant, with an additional \$5,000 available for low-income applicants, to retrofit their homes with new [FORTIFIED](#) roofs and additional measures. Grants should be available for owner occupied single-family or duplex homes, affordable single-family housing developed or managed by a non-profit, and for state-subsidized multifamily rental housing. In addition to the grants, these programs should mandate homeowners’ insurance premium discounts from all insurers operating in the state for certified-FORTIFIED housing, with a [floor of 20% premium discounts](#).
- The federal government can integrate risk into pre-disaster planning, incentivize resilience, incorporate risk into planning, promote climate risk disclosure, integrate equity, enhance coordination across agencies, and collect and publicly share better data on insurance markets. The federal government could

also leverage its own role in coordinating state insurance commissioners and governors to identify state and federal solutions.

g. How can Congress ensure that challenges faced by frontline, disadvantaged and underserved communities are prioritized as integral to community resilience, adaptation, and preparedness?

- Create governance structures across relevant agencies and potentially within Congress that promote community advisory committees. This would bring the public and frontline communities into the decision-making process to identify what needs would best serve communities to prepare for and respond to climate disasters.
- Support community-based organizations in identifying and building out climate resilience strategies and solutions. This could be through existing community block grant structures or formula grants to areas prone to climate disasters within the last 10 to 20 years.
- Support income-adjusted pricing models for flood insurance and other financing or grant programs.
- Prioritize assistance to both climate-vulnerable areas and to underserved areas that have [experienced historical disinvestment](#) such as redlining.
- Consider relocation incentives for communities in climate-prone disaster areas.
- Fund emergency alert systems and ensure proper implementation.
- Fund updating or integrating local flood-plain maps into NFIP maps.

h. Where do you see opportunities to integrate clean energy solutions, such as energy efficiency, renewable energy, and battery storage, into community disaster resilience and preparedness programs and activities?

- Require the latest energy code standards be adopted for all homes with federally backed mortgages.
 - Stop agency delays in implementing the [2024 Final Determination](#): Adoption of Energy Efficiency Standards for New Construction of HUD- and USDA-Financed Housing.
 - [The Federal Housing Finance Agency](#) should also require new homes with mortgages backed by Fannie Mae and Freddie Mac to be built to updated energy codes. It would follow the lead of other federal agencies (HUD, USDA, VA) that are strengthening their efficiency requirements for mortgages they back.
- Combine and utilize existing programs and frameworks: LEED certification, ENERGY STAR, building codes, energy codes, [state home energy efficient policies](#) that support wildfire resilience, etc.

i. What other information would you like us to understand and consider for this section of the Thriving Economy Project?

- Many of the reforms needed for state and federal insurance policies may face pushback over the same political reasons as we see against climate and renewables policy. Many state insurance commissioners are heavily [lobbied](#) by the insurance industry and often go on to work for the industry— with many insurance companies [contributing](#) to insurance commissioner races.
- Public Citizen has been at the forefront of addressing the climate-driven insurance crisis through leading the [Equitable & Just Insurance Initiative](#). We are teaming up with dozens of local, state, and national organizations to advocate for state and federal reforms while elevating the voices of impacted communities across the country.

Staff Contact: For more information on responses to the questions answered in this section, please connect with Carly Fabian (cfabian@citizen.org) and Elyse Schupak (eschupak@citizen.org).

5. Cheap, Abundant, and Clean American Energy for All

a. What are the key barriers to delivering reliable, clean, and affordable energy across the country?

- Implementation of delivering reliable, clean, and affordable energy will require several reforms and political shifts at the federal, state, and local level:
 - **Fossil Fuel Driven Anti-Renewable Propaganda:** While more Americans prefer and want to see renewable energy because it's clean and affordable, there is still [pushback like NYBYism](#) across the country. Community opposition against renewable projects is exacerbated by the dis- and misinformation about renewable technology and climate change, as well as the negative rhetoric from the Trump administration and some members of Congress.
 - **Financial and Political Opposition:** Financial and cost barriers also exist for areas that want to pursue community-based projects due to federal disinvestment in renewables. The transformative investments from the Inflation Reduction Act through the Greenhouse Gas Reduction Fund, Loan Programs Office, and tax incentives, created the policies necessary to scale up reliable, clean, and affordable renewable energy. Unfortunately, the financial incentives for these policies came with partisan, political strings that were ultimately rescinded. While some States have replaced Federal investments in climate, any future financial mechanisms at the federal level must require bipartisan, long-lasting solutions that can't be overturned between changes in administrations.

Federal financial incentives being slashed are a main barrier to deliver reliable, clean, and affordable energy across the country. This includes slashing solar and wind incentives and eliminating EV tax incentives, while the Trump administration increases [fossil fuel subsidies](#). We explore these tax subsidies further in response to question 8.

Additionally, renewables have always faced political opposition, especially as it relates to mis- and dis-information with deployment of projects in certain communities. Many renewable developers cite "local opposition" as one of the key barriers to implementation. However, in addition to these challenges, Trump has made clean energy, in particular solar and wind, a target of his administration. The animosity for renewables will only increase with continued political ill-will towards clean, cheap energy—and unfortunately, national rhetoric often trickles down to local opposition.

- **Labor and Trades:** Shifting labor and trades needs will become an increasingly needed dynamic for delivering reliable, clean energy. Considering, again, the political pushback on renewables, ensuring job security among labor and trades will continue to be a barrier as long as political whiplash of renewables remains in place at the national, state, and local level.
- **Utility Consumer Rate Structures + Data Centers:** While Section 201 of the Federal Power Act states that "[the business of transmitting and selling electric energy for ultimate distribution to the public is affected with a public interest](#)," the public interest has never been explicitly defined to guarantee affordable and sustainable energy for working families. Congress should consider strengthening the definition of public interest and create new standards that require electric utilities to prioritize people over profits. Reliance on markets to allocate supply and prices for energy that Congress has deemed to be in the public interest has been severely tested during an unprecedented stretch of climate-induced severe weather, a global health pandemic, and war in Europe. Commodity and energy markets are perceived to maximize efficiencies for price discovery, allowing producers and end-users alike to hedge against price risk. But [reliance on these markets during climate change-induced storms and war-related upheaval is testing limits on effective price formation](#). It is difficult for markets to work efficiently when extreme events render market fundamentals dysfunctional. While it is illegal in most states for grocery stores to

charge higher prices for food during an extreme weather event, it is common for energy companies in today's deregulated markets to freely price-gouge during extreme weather events. [Public Citizen has defined this as climate change price gouging](#) and policymakers need to update and reinforce firm regulations to stop this practice and protect consumers.

Additionally, U.S. power markets are in the midst of disruptive change triggered by technological revolutions. But the vast deployment of renewables in the US is not attributable to markets, but rather government mandates and government policy incentives.

To protect consumers, the following market reforms should be adopted:

- FERC should initiate immediate 206 proceedings to review electric transmission cost of capital and return on equity standards to limit profits. If working families are forced to budget and limit expenses because of high energy bills, so too must investors.
- Democratize access to federal and state utility regulators so the needs of household consumers are represented in proceedings, to include [intervenor funding](#) and stronger standards to ensure more public interest organizations qualify for legal standing in proceedings, and reform the stakeholder processes of Regional Transmission Organizations to improve public interest participation.
- Eliminate [the ability of utilities to recover from ratepayers costs associated with their political lobbying](#).
- Limit climate change price gouging through nationwide soft cap transparency reporting.
- Direct FERC and CFTC to coordinate to alleviate information asymmetry between futures and spot markets.
- Enhance levels of publicly available, real-time operational data.
- Boost enforcement over the increasing role of financial traders, including strengthening oversight and reporting of the interconnection of gas and power traders.
- Improve spot natural gas transparency through 15 USC § 717t-2(a)(4).
- Reform RTOs control over stakeholder processes.

As the [price of electricity increases](#) for Americans and emerges as a [political bellwether](#), utility reforms could not be more critical. [PJM capacity auction markets](#) and impacts of [data centers](#) on residential energy bills are shining a light on the inequities in the current utility and electricity market structures. In addition to ensuring we increase energy supply with clean and cheap renewables to meet increasing energy demand, an additional challenge will be how Congress addresses and prioritizes utility rate structures and other regulatory structures to reduce the financial burden of electricity prices.

c. How can Congress ensure that communities play a larger role in shaping energy development and infrastructure planning?

- Congress can ensure communities play a larger role by requiring utilities, renewable and clean energy developers, and other decision makers to gather public input early and throughout the energy development process and infrastructure planning. Every community is different and may require different needs, methods to inform the public, and structures to be brought into the energy development and infrastructure planning process.
- Under the Biden Administration, the Department of Energy worked to structure community benefit plans and community benefit agreements to get community buy-in and drive faster adoption of projects. Congress can work to bring back similar office structures to ensure energy developers are working alongside federal, state, and local governments while engaging local communities along the way.

Additionally, Congress could also encourage or fund states to stand up a community advocate office to ensure communities play a larger role.

d. How can Congress ensure energy affordability and equitable access while meeting growing demand?

- Congress should consider what is needed to create an equitable rate structure that reduces energy costs as well as [energy burden](#) for consumers. This could include time-of-use, tiered rates, income-based programs, and other structures that ensure utilities are required to provide equitable and affordable electricity rates.
- Congress must also address the rising electricity costs associated with the data center boom, among other adverse impacts on communities and the climate. In December, Public Citizen released a [policy solutions guide](#) of recommendations for local, state, and federal policymakers to rein in Big Tech and ensure any buildout is done with strong guardrails in place. The recommendations include foundational protections state and local governments should implement prior to data center build outs, such as creating baseline requirements or conditional commitments, implementing transparency requirements, and conducting energy and water studies. Additionally, it includes a set of federal recommendations as a starting point to rein in unregulated data centers.

Staff Contact: For more information on responses to the questions answered in this section, please connect with Tyson Slocum (tslocum@citizen.org), Deanna Noel (dnoel@citizen.org) and Meghan Pazik (mpazik@citizen.org).

7. A Nationally Secure, Globally Competitive Energy Sector

a. What Congressional actions are most urgently needed to secure critical mineral supply chains and reduce dependence on foreign supply chains?

- Mining is already heavily subsidized but lacks strong standards to ensure environmental and public health protections, pathways to high quality union jobs, and safeguards for Indigenous peoples and local communities.
- Congress should support strong responsible sourcing standards that minimize exposure to the financial, operational, and reputational risk associated with poor mining practices, while ensuring that critical mineral reserves are used for clean technology and decarbonizing our economy rather than military applications.

b. What opportunities exist to expand domestic mining, processing, or recycling in a way that safeguards the environment, and how can Congress drive these objectives?

Congress can drive these objectives by writing legislation that does the following:

- Mandates card check neutrality for workers at mines.
- Requires the Free Prior and Informed Consent (FPIC) of Indigenous Peoples who are disproportionately impacted by mining projects. In the United States [most untapped mines are within 35 miles of Indigenous land](#).
- Strengthens environmental and ecological legal protections in and around mine sites to avoid biodiversity loss, manage mine tailings, protect drinking water, and reduce environmental justice harms.
- Encourages new mine sites to sign community benefits agreements with local communities, unions, and Indigenous peoples' to ensure benefit sharing of mining development.
- Supports the build out of the [zero waste hierarchy for batteries](#) and effectively manages battery end-of-life. This means redesigning energy and transportation systems, reducing consumption of critical minerals, repairing batteries, [repurposing batteries](#), [recycling](#), and battery material recovery.

Additionally, Congress should consider the following short, but impactful, list of procurement policy priorities as it relates to domestic battery disclosures to maximize buy-in from labor and environmental justice partners:

- Create and require companies to comply with a global battery passport, mineral supply chain tracing, and related commitments to source from IRMA (Initiative for Responsible Mining Assurance) audited mines
- Require disclosure of the wages and benefits of workers at battery manufacturing plants
- Require extended producer responsibility for batteries for when they need to be recycled, and create initiatives or programs to support these requirements
- Require an embodied emissions or life cycle emissions standard

c. How can the U.S. partner more effectively with allies to build secure, transparent energy and materials supply chains?

- Close the national security exemption for critical minerals mined in known conflict zones such as the Democratic Republic of the Congo.
- Ensure strong labor, environmental, and human rights and Indigenous rights protections for minerals mined from other countries.

d. What workforce development strategies should Congress enact to support a resilient energy and manufacturing sector?

- Require card check neutrality for mine sites.
- Work with unions to create paid workforce development programs that prioritize providing historically disadvantaged groups with access to good jobs. Historically disadvantaged groups could include women, people of color, Indigenous peoples, people coming out of incarceration, veterans, people experiencing homelessness, people coming from high poverty zip codes, etc.
- Develop opportunities and strategies for [supporting](#) diverse and minority-owned contractors and developers in addition to clean energy workers.
- Provide analysis on how building new mines could impact local economies and incomes.

Staff Contact: For more information on responses to the questions answered in this section, please connect with Chelsea Hodgkins (Chodgkins@citizen.org) and Abhilasha Bhola (abhola@citizen.org).

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

a. Identify the most important green financing gaps in America today and how Congress can help fill those gaps.

- The most important green financing gaps are the ones left behind as a result of Trump's clawbacks of clean energy tax incentives and climate programs and the cancellation of billions of dollars worth of clean energy projects.
- Congress can help fill the gaps left behind from the Trump Administration by building towards reliable, bipartisan or non-partisan solutions that center affordability, reliability, and resiliency of energy systems. This can and should include prioritizing financing clean and cheap renewable energy and financing distributed renewable energy sources that can be owned by the community.

b. Which financial products (e.g. tax credits, guarantees, grants, debt/equity, etc.) and institutions (e.g. green banks, CDFIs, credit unions, etc.) have proven most effective in accelerating clean technology deployment and lowering costs for consumers, and how can Congress support them?

- Congress can provide long-term capitalization through grants, low-cost federal loans, and flexible revolving-fund authority to state green banks, CDFIs, and public financing authorities to expand concessional and bridge lending.

- Authorize federal loan guarantees that de-risk state green banks and community lenders' portfolios to unlock much larger volumes of private and public capital for clean energy.
- Fund project technical assistance to help states, municipalities, and community lenders standardize contracts, reduce transaction costs, and fully leverage federal tax incentives.
- Additionally, Congress could consider new reforms to certain clean energy tax credits, such as:
 - Reforming manufacturing tax credit to include increases to the tax credit amount based on transparent and responsible sourcing requirements. This could be similar to increases of the ITC/PTC tax credit that included an increase of tax credit amounts based on prevailing wage and energy justice communities.
 - Investing in additional research, development, and deployment tax credits for storage of clean and renewable energy (batteries), as well as incentives for the responsible reuse and recycling of those technologies. Potentially working to include incentives aligned or modeled after circular economies.
 - Considering additional transportation decarbonization incentives. The elimination of the consumer and commercial electric vehicle tax credit will slow the much needed decarbonization of the transportation sector. In addition to new reforms to claiming electric vehicle tax credits, Congress should consider an EV charger installation credit, a research and development for clean transportation innovation, and other incentives for micro-mobility solutions that cities and townships can take advantage of. The transportation decarbonization incentives could also be paired with broader EV policies, such as feebates and/or a low-carbon fuel standard.
 - Repealing the 45Q tax credit and reforming carbon removal technology specific tax credits that better reflect varying nascent carbon removal technologies. Repealing the 45Q tax credit is a first step in broader carbon removal tax credit reforms, specifically for enhanced oil recovery. A [2020 investigation](#) by the U.S. Treasury Inspector General for Tax Administration revealed that nearly 90 percent of 45Q tax credits for carbon capture and storage were improperly claimed, as only 30 percent of companies claiming the credits had the required monitoring, reporting, and verification plans in place with the U.S. Environmental Protection Agency. And in HR.1, the 45Q tax credit was further expanded to claim additional money. The lack of transparency, monitoring and accountability should call into question the feasibility of this tax credit for productive uses to make meaningful carbon emissions reductions.

d. How have recent legislative and regulatory changes affected the ability to finance clean technology innovation and deployment at scale?

- **Rollbacks to IRA and GGRF:** The loss of federal de-risking tools including loan guarantees (DOE's loan program office), elective-pay tax credits, and GGRF grants has widened the financing gap for predevelopment and high-risk clean energy projects. Municipalities, community lenders, mission-driven financiers, and nonprofits that rely on concessional loans and bridge financing now face significant access-to-capital barriers, limiting their ability to pursue and advance clean energy deployment.
- **Expanded Fossil Fuel Subsidies:** Under recent legislative and regulatory changes, the Trump Administration has provided more tax credits and tax breaks to the fossil fuel industry while also clawing back renewables incentives. Expanding renewables incentives and financing the clean energy future needs to include consideration of how fossil fuel subsidies manipulate the electricity market, and thereby incentivizing fossil fuels to stay in the market, while renewables have to continue to "compete" under the same market with less incentives. Some resources to learn more about fossil fuel subsidies include:
 - [Fossil fuel subsidy tracker](#)
 - Public Citizen's [report](#) on the reconciliation bill's fossil fuel tax subsidies, including adding tax incentives for metallurgical coal, and allowing intangible drilling costs to be deducted from a company's 15% corporate alternative minimum tax liability.

- [Oil Change International's fossil fuel subsidies report](#) which found that the U.S. federal government is now subsidizing the production of oil, gas, and coal by at least \$34.8 billion per year.
- **Industry Burnout:** Many in the clean energy sector that were most impacted and targeted by the legislative and regulatory changes from the One Big Beautiful Bill have expressed burnout, whiplash, and exhaustion with trying to stay afloat and are skeptical any future efforts to try and bring back the IRA's clean energy incentives will be effective unless it's done in a non-partisan way and with broad bipartisan support.

f. What challenges exist in applying insurance and other risk-management tools to de-risk projects and unlock private capital into clean energy and resilience projects, and how can Congress help overcome those challenges?

- Provide capital to projects, as was done through the GGRF, for innovative financing including insurance:
 - **Solar Energy Loan Fund's [SAGE Program](#):** This program is an example of the critical role community development financial institutions (CDFIs) and green banks play in helping community-based developers bring affordable and climate-resilient housing to their communities through flexible financing, training, and mentorship.

g. Are there models or tools implemented at the state or local level or internationally that should inform federal climate finance policy?

- The [Nordic Investment Bank](#), a multilateral public development bank, presents an instructive example in terms of productively competing with other public and private banks by “adjusting its terms and rates accordingly to make its offerings more attractive to clients.”
- [Affordable and Special Needs Housing Program](#): Virginia's Department of Housing and Community Development offers forgivable, no-interest loans to support the construction of new and renovation of existing affordable housing units. Loan amounts are capped per project in order to leverage other funding sources, including LIHTC awards, local governments, and nonprofit grants.
- [Mass Solar Loan Program](#): This program provides interest rate buydowns in partnership with local lenders and operates a loan loss reserve to reduce risks to lenders while extending access to borrowers to lower credit scores.
- [Community Efficiency Financing](#): Canada's Green Municipal Fund provides two funding options for municipalities to finance local home energy upgrade programs through a credit enhancement (in partnership with a third-party lender or utility) or a combination of a loan (provided through on-lending locally) and a grant.
- [DC Green Bank Small Business Loan Fund](#): In partnership with City First Enterprises, a local CDFI, DC Green Bank operates a \$1 million loan pool, capitalized with contributions from both lenders, and also provides a loan loss reserve for the entire pool.
- [LISC DC Recoverable Grants for Predevelopment](#): One example includes LISC DC providing a \$100,000 recoverable loan to cover 20% of the overall predevelopment cost of the preservation project.
- [DC Green Bank Pre-Development Loans](#): DC Green Bank's standard Predevelopment Loans is for up to \$250,000 but allows for customization.
- [Bank of North Dakota Flex PACE for Affordable Housing](#): This state-owned bank offers financing for affordable housing and childcare centers with negotiable repayment terms of up to 20 years.

h. What other information would you like us to understand and consider for this section of the Thriving Economy Project?

- Consumer protections for all forms of green lending are a critical component of a fair clean energy future.

- [Consumer solar awareness resources](#) from Treasury, CFPB, FTC, and DOE
- Federal [Sunshine on Solar Lending Act](#), introduced in July 2025
- [Letters to Regulators](#): Equitable and Just Green Lending Starts with Strong Consumer Protections. Signed by 45 organizations.

Staff Contact: For more information on responses to the questions answered in this section, please connect with Mekedas Belayneh (mbelayneh@citizen.org), Elyse Schupak (eschupak@citizen.org), Tracey Lewis (tlewis@citizen.org), and Meghan Pazik (mpazik@citizen.org).

9. Government that Delivers:

a. What barriers exist within federal institutions that prevent efficient, adaptive policymaking and service delivery?

- **Across Federal Agencies:**
 - Across federal agencies, there has been a loss of knowledgeable staff during and likely post-Trump administration. Especially from the DOGE cuts, dismantling of the core purpose of the EPA, and DOE favoring fossil fuel projects and opposing wind and solar. Some solutions to rebuild institutional knowledge could be to bring back federal staff that took buy-outs or retired early and return in an advisory role with an expedited re-hiring process.
 - Additionally, the retention and investing in younger civilian staff across federal institutions. As well as bringing back experts to agencies that have historically lost funding and staff over several administrations. Congress should also direct funding to increase agency staff capacity for those agencies (EPA, DOE, Interior, Treasury, etc.)
 - Process for hiring new staff can be slower and arduous than other hiring practices in other fields, which can become a barrier in hiring skilled talent for federal agencies
- **Within Congress:** Lack of congressional staff knowledge, and at times lack of member knowledge, and capacity for having a deeper understanding of specific policy issues can be a barrier for adaptive and productive policymaking. Additionally, deep partisanship on climate and clean energy issues continues to be an ongoing issue in Congress, especially under the Trump Administration and republicans voting against their constituents, state, and district interests.

b. What models or reforms could Congress enact to improve public-sector delivery of infrastructure, permitting, or community support programs?

- Many of the ideas and programs in the Bipartisan Infrastructure Law (BIL) and Inflation Reduction Act (IRA) provided a first step in improving public-sector delivery of infrastructure, permitting, and community support programs to hasten the clean energy transition. Strong, long-lasting programs take time, trust, and buy-in from local and state stakeholders and reforms at the federal level for any future climate and clean energy legislation be considered, should have more structured buy-in from States and localities to have a potentially faster implementation of federal programs.
- Public Citizen is working on what pro-consumer and pro-climate improvements to environmental and infrastructure permitting could look like, if reforms were to be pursued in a more favorable political climate. Many of those reforms begin with sufficient staff capacity, better NEPA permitting data, and centering community input early and often.

c. How can Congress help ensure that the federal government better coordinates across agencies, jurisdictions, and sectors to achieve integrated solutions?

- Designate staff-level inter-agency working groups or task forces that are interdisciplinary with goals of creating solutions that address multiple challenges such as affordable housing, climate change, and

hastening the clean energy transition. These should be staff level roles so experts are permitted to keep working on established issues across administration changes.

- In addition to staff level engagement, Congress can work to push for better transparency, data, and sharing across agencies. Reporting out findings of specific actions that would require cross-agency coordination to members of Congress, may also improve Congress' understanding of successes or improvements needed for cross-agency coordination.

d. What capacity-building investments should Congress make to help agencies respond to 21st-century economic and climate challenges?

- At a time where there is high distrust of the government and the government systems that are meant to support the public, capacity-building investments means investing in people (staff) and community (community-based organizations). At the government level, this could mean reinvesting in institutional knowledge from agencies lost during the past few decades, especially during the DOGE cuts, and/or working to rebuild trust in the government by making government officials across agencies more available and accessible to people. The reinvestment of institutional knowledge means bringing back experts in an advisory capacity to better inform what new structures may be needed in certain agencies, or what staff-capacity or positions could be improved.
- Re-propose the [Greenhouse Gas Reduction Fund](#) program in its entirety given its value as an economic development, green industrial policy program designed to accelerate public-private partnerships for financing energy efficiency, renewable energy, and other projects for low-income and disadvantaged communities.