

Congress of the United States

Washington, DC 20515

May 22, 2023

The Honorable Janet Yellen
U.S. Department of the Treasury
1500 Pennsylvania Avenue, NW
Washington, D.C. 20220

Dear Secretary Yellen,

We are writing on behalf of wind turbine tower manufacturers and workers in our state regarding the U.S. Department of the Treasury's implementation of the advanced manufacturing production (AMP) credits codified in the Inflation Reduction Act (IRA). Recently, the Department released preliminary guidance for the domestic content bonus credit stating that the wind turbine tower is categorized as "steel/iron." Therefore, the domestic content bonus credit will only be awarded if all wind turbine tower sections are entirely produced in the United States. We applaud this decision and encourage the Department to follow a similar path when implementing AMP credits. Specifically, we recommend that the Department only grant AMP credits for wind turbine towers produced entirely in the United States. Together, these actions will ensure that domestic producers of clean energy technologies receive the benefits intended by Congress.

Reliable wind power is critical to the United States' clean energy transition, and onshore demand can be met with domestic manufacturing of wind turbine towers.¹ When wind turbine towers are produced by U.S. manufacturers, the materials are mostly sourced from U.S. steelmakers. Furthermore, each tower consists of multiple sections that are assembled at the final installation site. In this way, tower production and installation directly and indirectly supports thousands of highly-skilled, well-paying jobs around the country.

The IRA provides AMP tax credits for producers of domestic wind turbine components, including towers. However, foreign tower producers with U.S. facilities often combine U.S.-made and foreign-made sections in the same towers. These foreign sections have been found to be unfairly dumped and subsidized in violation of U.S. trade laws.^{2,3,4,5} Since the AMP tax credit

¹ U.S. Department of Energy, Wind Energy Supply Chain Deep Dive Assessment (2021)

² Utility Scale Wind Towers from the People's Republic of China, 78 Fed. Reg. 11,146 (Dep't Commerce Feb. 15, 2013) (antidumping duty order)

³ Utility Scale Wind Towers from Canada, Indonesia, the Republic of Korea, and the Socialist Republic of Vietnam, 85 Fed. Reg. 52,546 (Dep't Commerce Aug. 26, 2020) (antidumping duty orders)

⁴ Utility Scale Wind Towers from Spain, 86 Fed. Reg. 45,707 (Dep't Commerce Aug. 16, 2021) (antidumping duty order)

⁵ Utility Scale Wind Towers from India and Malaysia, 86 Fed. Reg. 69,014 (Dep't Commerce Dec. 6, 2021) (antidumping duty orders)

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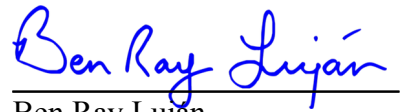
is based on the total rated capacity of the wind turbine, it should only be available to manufacturers who produce all tower sections in the U.S.

Thank you for your attention to this important matter.

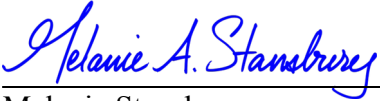
Sincerely,



Martin Heinrich
United States Senator



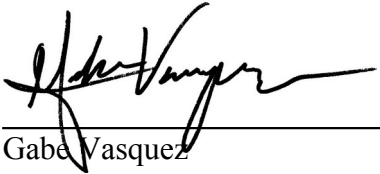
Ben Ray Lujan
United States Senator



Melanie Stansbury
Member of Congress



Teresa Leger Fernández
Member of Congress



Gabe Vasquez
Member of Congress