S2 Strategies

From: S2 Strategies
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Subject: Overview of Energy and Related Provisions in Budget Reconciliation Legislation – H.R. 1 and U.S. Senate Committee Proposals

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Key Takeaways

This bill will **increase household energy costs** – raising Americans' electricity bills by 10% and as much as $400/year

The bill will **kill energy and manufacturing jobs** – leading to the loss of over 800,000 jobs, putting over $500 billion in investment at risk

The bill will **undermine grid reliability** – at a time of rapid load growth and heat waves it will reduce energy capacity installed on the grid by at least 50% over the next 10 years

Table: **State-by-state impacts** of the Reconciliation bill

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Energy Tax Credits
Technology-Neutral Electricity Credits

The **technology-neutral Production Tax Credit (PTC 45Y)** and **Investment Tax Credit (ITC 48E)** currently provide a credit for up-front investment in or for energy production from zero-emission electricity generation and energy storage projects. These credits can be claimed by solar, wind, geothermal, hydropower, nuclear, and other zero-emission energy technologies, and energy storage (ITC only) projects that commence construction before either 1) the end of 2032 or 2) the year in which U.S. electricity sector emissions are reduced by 75% below 2022 levels, whichever comes later. **H.R. 1 and Senate Finance Committee (SFC) proposals functionally repeal 45Y/48E after 2025.**

Current Law for ITC and PTC	HR1	Senate Text
Solar and Wind Energy	**Swift Cliff.** Wind and solar projects only receive full credit under 45Y/48E if they • Commence construction within 60 days after passage of the bill, and • Are *placed in service* before the end of 2028. A very small number of projects will be able to satisfy those requirements.	**Rapid Phaseout.** 45Y/48E eligibility for wind and solar determined by commence construction date. Projects that *commence construction* • Before the end of 2025 would receive 100% of credit value • In 2026, 60% of credit value (i.e. 18% ITC instead of 30%) • In 2027, 20% of credit value • In 2028 and later, no credit
Geothermal, Hydropower, Energy Storage	**Swift Cliff.** Projects only receive full credit under 45Y/48E if they • Commence construction within 60 days after passage of the bill, and • Are *placed in service* before the end of 2028. A very small number of projects will be able to satisfy those requirements.	**Extension of credits, with phaseout.** Full credit available for **zero-emission technologies <u>excluding wind/solar</u>** based on commence construction date. • Before end of 2033, 100% of credit value • In 2034, 75% of credit value • In 2035, 50% • In 2036 and later, no credit Also loosens lifecycle greenhouse gas emissions analysis to determine eligible technologies.

Nuclear	**Accelerated Sunset.** Allows new advanced nuclear projects and relicensing/expansion of existing plants that commence construction before the end of 2028 to be eligible for 45Y/48E (and remain eligible for 45U the nuclear power PTC, although that credit is moved to expire in 2031). This is a shorter timeframe for new projects than current law, and FEOC requirements still apply, too, making new nuclear projects much more costly to build than under current law.	**Extension with phaseout.** Full credit available for **Nuclear** based on commence construction date. ● Before end of 2033, 100% of credit value ● In 2034, 75% of credit value ● In 2035, 50% ● In 2036 and later, no credit
Foreign Entity of Concern (FEOC) Restrictions	**Unworkable.** Any project receiving "material assistance from prohibited foreign entities," is ineligible for credits starting at end of 2025. Includes functionally unworkable limits on use of even minor parts (e.g. specialized screws) from companies with relationships, including familial ties, to foreign countries. Includes more stringent 'Foreign Entity of Concern' (FEOC) restrictions than earlier versions of the bill.	**Unworkable**. Unlike the House Bill, the Senate text establishes a material assistance *cost ratio* framework—modeled after the existing domestic content bonus—that sets credit-specific eligibility thresholds based on the share of non-FEOC inputs used across different technologies. You can find a full breakdown of ratios from Crux here. In addition to meeting these sourcing thresholds, projects must also pass new Prohibited Foreign Entity (PFE) tests tied to foreign ownership and influence. These tests, originally introduced in the House bill and revised in the Senate version, represent a significant expansion beyond the IRA, which only applied FEOC restrictions to the §30D clean vehicle credit.

		Like the House version, the Senate proposal introduces a substantial and unprecedented compliance burden that could significantly restrict the number of eligible projects. Industry-specific analyses are expected soon as stakeholders evaluate the implications across sectors. The Senate version also includes a 10 year recapture rule (vs. 5 years in current law), in which at any point in the 10 years after receiving a tax credit if an entity violates a FEOC restriction it could have its credit recaptured. This would have a chilling effect on the market.
Modified Accelerated Cost Recovery (Depreciation method that allows businesses to recover the cost of assets, like clean energy equipment, over a period of time through annual deductions. Current law typically allows a 5-year recovery period, reducing tax liability and accelerating the return on investment.)	No change from current law.	**Ends the use of accelerated cost recovery** – further restricting investment in projects using these credits.
Leased Residential Solar Projects	**End Credits for Third-Party Ownership.** Disallows use of 45Y/48E for residential solar and wind projects that utilize a third-party lease financing model, beginning 2026.	Same as H.R. 1, **ends credits for third-party ownership** beginning in the "next-taxable year" or 2026.

Transferability & Elective Pay	**Transferability** (Section 6418) is repealed for all credits starting in 2027, excepting 45Y, 48E and 45U. **Elective Pay** (Section 6417) is not specifically modified. The **expiration and inaccessibility of underlying credits renders both provisions practically unusable.**	**Restricts use of Transferability or Elective Pay** (furthermore, neither provision can be utilized in the case where the underlying credit is repealed): ● **Entities claiming Elective Pay must meet the requirements for the domestic content bonus credit in order to claim the underlying ITC or PTC**, even in situations where relevant products are not produced in the U.S. in sufficient quantity or if procuring them would be prohibitively expensive. However, the SFC bill draft leaves in place the domestic content statutory exemption for direct pay projects that are less than 1 MW. ● **Imposes a FEOC test on buyers of transferable tax credits.**

Other Energy Tax Credits

Current Law	HR1	Senate Text
Advanced Manufacturing Credits	The **Advanced Manufacturing Production Credit (45X)** is phased out, ending after December 31, 2031 (one year earlier than current law). **Wind energy components are no longer eligible after December 31, 2027.**	**Retains the 45X credit, eliminates phasedown and returns full 30% credit through 2032, with exceptions**: Like the House bill, it **restricts the credit for wind technology components sold after 2027**. It also **ends the credit for solar and battery technologies one year early**, at the end of 2031,

	FEOC restrictions also apply to 45X, and are so onerous and complex as to render the credits unusable after December 31, 2025. **Transferability is disallowed** after 2027 The **Advanced Energy Project Credit (48C)** is not altered in this bill.	and it includes a **phaseout for critical minerals** by 2032. It also **expands the number of battery components eligible for the credit**. **FEOC restrictions also apply to 45X**, making it highly unworkable. Amends **48C** – any unexpended credits can't be reallocated.
Electric Vehicle (EV) Credits	The **Clean Vehicle Credit (30D)** is terminated after December 31, 2025, with one exception in 2026 (still allowed for manufacturers that have sold fewer than 200,000 covered vehicles in the U.S. between 2010-2025). Terminates **Previously-Owned Clean Vehicle Credit (25E)** after December 31, 2025. Terminates the **Commercial Clean Vehicle Credit (45W)** after December 31, 2025; allows an exception for vehicles placed in service before January 1, 2033, if acquired via contract before May 12, 2025. Terminates **Alternative Fuel Refueling Property Credit (30C)**, which supports EV charging infrastructure, after December 31, 2025.	Terminates **30D** effective **180 days after enactment**. Terminates **25E** credit **90 days after enactment**. Terminates **45W** credit effective **180 days after enactment**. Terminates **30C** credit **one year after enactment**.

Buildings Credits	The **Energy Efficient Home Improvement Credit (25C)** for residential energy efficiency and electric appliances, and the **Residential Clean Energy Credit (25D),** used primarily for residential rooftop solar, are both repealed at the end of 2025. The **New Energy Efficient Home Credit (45L)** is repealed after December 31, 2025, but will remain available through December 31, 2026, for homes whose construction began before May 12, 2025. The **Energy Efficient Commercial Buildings Deduction (179D)** is not addressed in the legislative text.	**Repeals 25C** and **25D** credits **six months after bill enactment.** **Repeals** the **45L and 179D one year after enactment**.
Nuclear and Carbon Capture Credits	The **Zero-Emission Nuclear Power Credit (45U)** is eliminated for projects that commence construction after December 31, 2031 (one year earlier than current law). This credit is also subject to **FEOC** restrictions. The **Carbon Sequestration Credit (45Q)** is also **subject to FEOC restrictions**. Transferability of this credit is repealed after two years.	**Keeps current timelines but subjects both 45U and 45Q to FEOC restrictions.** Conforms the 45Q credit value for carbon that is utilized with carbon that is captured.
Clean Fuels Credits	The **Clean Hydrogen Production Credit (45V)** is terminated effective January 1, 2026.	**Repeals 45V** after 2025.

	The **Clean Fuel Production Credit (45Z)** is amended to prohibit use of foreign feedstocks and allowing only those from the U.S., Mexico, or Canada. It also excludes indirect land use changes from lifecycle GHG calculations and mandates feedstock-specific emission rates for fuels from animal manure. The credit expiration is extended from December 31, 2027, to December 31, 2031. It also excludes foreign entities and foreign-influenced entities from eligibility, under the **FEOC** provision. No significant changes are made to the **Biodiesel (40A)** or **Sustainable Aviation Fuel (40B)** credits.	**Amends 45Z** – like the House it extends the credit through 2031 (rather than 2028 under current law), imposing a 20% haircut for fuel produced from feedstocks outside the U.S. after 2025, excluding indirect land use changes for the purposes of lifecycle greenhouse gas emissions calculations, and providing authority to establish distinct emission rates for specific manure feedstocks. The proposal also addresses overlapping claims for the 45Z credit, and **FEOC restrictions apply to 45Z** after 2025. No significant changes are made to the **Biodiesel (40A)** or **Sustainable Aviation Fuel (40B)** credits.
Intangible drilling and development costs taken into account for purposes of computing adjusted financial statement income	Not included.	SFC text proposes a provision titled **"intangible drilling and development costs taken into account for purposes of computing adjusted financial statement income"** that would carve out a new **$1 billion subsidy** to oil and gas companies – exempting these companies from the corporate alternative minimum tax established in 2022, and allowing them to avoid an already minimal tax on billions in profits.

Department of Energy (DOE) Programs

<table>
<tr><th>Current Law</th><th>HR1</th><th>Senate Text</th></tr>
<tr><td>Loan Programs Office (LPO)</td><td>Includes full rescission of funds for the DOE Loan Programs Office (LPO), used to cover the costs of credit subsidies supporting the office's loan authority (approx. $9B altogether). Including funds for the:
1703 Loan Guarantee Program
1706 Energy Infrastructure Reinvestment Program
Advanced Technology Vehicle Manufacturing (ATVM) Program
Tribal Energy Loan Guarantee Program
This would in-effect stop the office's ability to finance new energy and advanced manufacturing projects.</td><td>Senate Byrd Update: Updated Senate Energy & Natural Resources (ENR) committee text also zeroes out these DOE loan programs.

For the 1706 program it removes the requirement that projects reduce emissions, adds extra categories for project eligibility, and provides $660 million in credit subsidy funding for energy and minerals projects approved by the president. It also extends 1706 program authority through 2028 (from 2026). (A prior version of ENR text included repeal of the 1706 program and in its place the creation of an "Energy Dominance Financing" program, the updated version leaves 1706 in place but reforms it to match this EDF proposal.)

Updated ENR text also fully repeals the ATVM program and rescinds its unobligated balances.

These changes would in-effect stop the office's ability to finance new clean energy and advanced manufacturing projects, except certain likely polluting energy projects chosen by the president.</td></tr>
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DOE IRA Programs	Rescinded by H.R. 1 are unobligated funds for DOE IRA programs, including: ● **Advanced Industrial Facilities Deployment Program** (AIFDP, estimated at $500M in Jan. 2025) ● **Transmission Facility Financing** ($2B) ● **Grants to Facilitate the Siting of Interstate Electricity Transmission Lines** ● **Interregional and Offshore Wind Transmission Planning** ● **State-Based Energy Efficiency Contractor Training Grants** DOE Home Energy Rebates programs are kept intact. States that have approved programs continue to implement them. Although the Trump administration has not approved any new state programs since it took office in January 2025.	Senate Byrd Update: Senate ENR text **rescinds unobligated balances for these programs.**
Strategic Petroleum Reserve (SPR)	Provides new funding ($1.5B) for the **Strategic Petroleum Reserve** (SPR**).**	Senate Byrd Update: Updated Senate ENR text provides $218M for maintenance of SPR and $510M for acquisition of petroleum products for storage in the SPR.

Environmental Protection Agency (EPA) Programs

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<tr><th>Current Law</th><th>HR1</th><th>Senate Text</th></tr>
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<td>EPA IRA Programs</td>
<td>H.R. 1 repeals authority and rescinds unobligated funding for nearly every major EPA program created by the IRA, including:

Greenhouse Gas Reduction Fund (GGRF) (incl. NCIF, CCIA, S4A)
Climate Pollution Reduction Grants (CPRG)
Methane Emissions Reduction Program (MERP), and delays methane fee until 2034
Clean Heavy-Duty Vehicles
Environmental Justice Block Grants,
Clean Ports Program
School Air Pollution Monitoring
Fenceline Monitoring in Polluted Communities
Diesel Emissions Reductions Act
Low-Emissions Electricity Program
Low-Embodied Carbon Labeling initiative for construction materials
Air Pollution Monitoring Upgrades
Greenhouse Gas Corporate Reporting
Environmental Product Declarations
Enforcement Technology Systems
</td>
<td>Senate Byrd Update: The Senate Environment & Public Works (EPW) committee proposal also rescinds unobligated balances for these EPA programs, with the exception of the Clean Ports program. The Senate text also includes a delay of the methane fee until 2034.

Senate EPW text no longer contains repeal of underlying statutory authority, under the Clean Air Act, for most of these programs – following a ruling from the Senate Parliamentarian that repeal of statutory authorizations violates the Byrd rule. The one exception to this is the GGRF program – the Senate EPW bill would still repeal the statutory authority for the GGRF program, just like H.R. 1.

Repealing EPA's statutory authority could have devastating impacts on affected programs. Without statutory authority, EPA may feel empowered, or possibly even required, to terminate grant award contracts. And rescission of unobligated funds has the potential to bring administration and management of EPA programs to a halt.</td>
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	Repealing EPA's statutory authority could have devastating impacts on affected programs. Without statutory authority, EPA may feel empowered, or possibly even required, to terminate grant award contracts. And rescission of unobligated funds has the potential to bring administration and management of EPA programs to a halt. Removes funding for the **American Innovation Manufacturing (AIM) Act** implementation, aimed at HFC reductions.	Senate ENR text **does not include rescission of AIM Act funding**.
EPA Vehicle Emissions Standards	**Repeals EPA authority to set vehicle emissions standards** for light-duty and medium-duty vehicles. (Repeal of these standards, and other statutory authority under the Clean Air Act, has the potential to be disallowed under budget reconciliation rules in the Senate"Byrd Rule.") Also repeals NHTSA CAFE standards for these vehicle model years (see USDOT section)	Senate Byrd Update: **Senate EPW text no longer contains repeal of EPA multi-pollutant vehicle emissions standards for light-duty and medium-duty vehicles**, beginning model year 2027. This after the Senate Parliamentarian ruled that this provisions violates the Byrd Rule. The Senate Commerce Committee also functionally repeals NHTSA CAFE standards for these vehicle model years (see USDOT section)

Federal Energy Regulatory Commission (FERC) Programs and Energy Infrastructure Provisions

Current Law	HR1	Senate Text
Energy Infrastructure Permitting	Would create an **expedited federal regulatory approval**, and no judicial review, of natural gas projects under the Natural Gas Act – including pipelines and Liquid Natural Gas (LNG) export terminals – for which project sponsors pay the lesser of $10 million or one percent of overall project costs. The bill would create a $1 million fee to provide expedited DOE public interest determinations for liquid natural gas **(LNG) export facilities.** It includes a provision allowing for developers of oil, natural gas, hydrogen, carbon dioxide or other energy pipelines or electric transmission projects to receive a **Cross-Border Permit** for projects crossing into Canada and Mexico, for $50,000. And it creates a new **De-Risking Compensation Program** to compensate fossil fuel, nuclear, and mining companies if projects fail due to lawsuits or permitting issues.	Senate Byrd Update: The **Senate proposal does not include other provisions relating to expedited DOE regulatory approval of LNG projects,** nor other pipelines and cross-border energy projects reviewed by FERC. It also does not include a De-Risking Compensation Program. The Senate Parliamentarian ruled that a prior Senate ENR provision allowing LNG to pay a fee to have their project be deemed "in the public interest" violates the Byrd Rule.

Department of Transportation (USDOT) Programs

Current Law	HR1	Senate Text
USDOT IRA Programs Including the Federal Highway Administration (FHWA) and Federal Aviation Administration (FAA)	**Rescinds unobligated balances for USDOT IRA programs**, including: • **DOT Neighborhood Access and Equity Program** ($2.9B) • **FHWA Low-Carbon Transportation Materials Grants program** ($1B) • **FAA Alternative Fuel and Low-Emission Aviation Technology Program** ($200M)	The Senate EPW text also **rescinds unobligated balances for these programs**
National Highway Traffic Safety Administration (NHTSA) Corporate Average Fuel Economy (CAFE) Standards	**Repeals CAFE standards** for light-duty and medium-duty vehicles starting in 2027 and heavy-duty vehicles in 2030.	The Senate Commerce Committee proposal **eliminates civil monetary penalties against automakers under the CAFE program – effectively repealing the standards** for future vehicle model years, but without attempting to repeal the underlying statute (which could make the proposal more durable under the Senate's Byrd rule).
EV Registration Fee	Establishes a new **$250 annual registration fee for EVs**, and a $100 annual fee for hybrid vehicles, paid into the Highway Trust Fund. A previous proposal to adopt a similar fee for internal combustion engine vehicles was abandoned prior to committee consideration.	The Senate EPW and Commerce committees **do not include an EV fee** in their reconciliation proposals.

Department of Agriculture (USDA) Programs

Current Law	HR1	Senate Text
USDA IRA Programs	Includes **rescission of unobligated IRA funds** for the four following 'working lands' programs: • **Conservation Stewardship Program** (**CSP,** which contained approx. \$2.4B in unobligated funds in January 2025) • **Environmental Quality Incentives Program** (**EQIP** - \$6.5B) • **Regional Conservation Partnership Program** (**RCPP** - \$4.6B) • **Agricultural Conservation Easement Program** (**ACEP** - \$1.1B) These programs were authorized in previous Farm Bills, have long been oversubscribed, and received additional funds from the IRA. **Rescinds funding for IRA sustainable forestry** programs to states, communities and private landowners (estimated at > \$100M).	**Rescinds IRA funding for the same four working lands programs** but also **provides some new funding for each:** • **CSP:** Increases annual funding from \$1B to \$1.3B in 2026, \$1.325B in 2027, \$1.35B in 2028, & \$1.375B through 2031 • **EQIP:** Increases annual funding from \$2.025B to \$2.655B in 2026, \$2.855B in 2027, and \$3.255B through 2031 • **RCPP:** Increases annual funding from \$300M to \$425M annually in 2026, and \$450M annually through 2031 • **ACEP:** Increases annual funding from \$450M to \$625M in 2026, \$650M in 2027, \$675M in 2028, \$700M thru 2031. Also rescinds \$100M+ in funding for **IRA Sustainable Forestry programs.**

Department of Interior Programs

Current Law	HR1	Senate Text
Oil and Gas Leasing	Mandates an **expansion of oil, gas, and coal leasing on public lands and waters**. It requires the Department of the Interior to conduct 30 lease sales in the Gulf of Mexico over the next 15 years, and 6 lease sales in Alaska's Cook Inlet. In addition, the bill blocks federal efforts to limit coal leasing, mandates lease approvals within 90 days, and opens at least 4 million acres of public land to coal development. The bill also proposes **to lower oil and natural gas royalty rates**, reducing them from 16.67% to 12.5%, and for coal from 12.5% to 7%. It imposes new fees on members of the public who file objections to lease sales.	The Senate ENR proposal **mandates increased onshore and offshore oil, gas and coal leasing**. It requires quarterly onshore lease sales on federal lands in each of 9 Western states over the next ten years. It reinstates noncompetitive leasing, amends the Mineral Leasing Act to require all eligible lands are available for leasing, removes agency discretion to deny leases based on environmental, private land, or community concerns, and increases the term of an onshore drilling permit from 3 to 4 years. It also requires the Department of the Interior to conduct 30 lease sales in the Gulf of Mexico over the next 15 years, and six lease sales over the next ten years in Alaska's Cook Inlet. Senate ENR text directs greater federal revenue sharing with Alaska and Gulf Coast states, and it **lowers the federal onshore and offshore oil and gas royalty rates** from 16.67% 18.75%, respectively, to 12.5%. It repeals royalties imposed on all methane extracted from onshore and offshore leases. And it also requires increased coal leasing on federal lands, and reduces the federal coal royalty rate from 12.5% to 7%.

		Senate Byrd Update: The Senate Parliamentarian ruled that requiring leases to be issued to successful bidders within 90 days after sale violates the Byrd Rule, so that provision was removed.
Arctic National Wildlife Refuge & **National Petroleum Reserve Alaska**	The bill mandates the reinstatement of previously canceled oil leases in the **Arctic National Wildlife Refuge** (ANWR), and the scheduling of four new lease auctions there, while expanding drilling in the **National Petroleum Reserve in Alaska**. Additionally, it would reinstate two previously-cancelled mining projects, and approve the Ambler Road project in Alaska.	Senate ENR text also **increases oil and gas leasing in ANWR and NPRA**, requiring four and six lease sales in each, respectively, over the next ten years. Senate Byrd Update: The Senate Parliamentarian has ruled that requiring the Secretary of the Interior to permit construction of Ambler Road violates the Byrd Rule, so that provision was removed from ENR text.
Renewable Energy Fees and Leasing on Public Lands	Provides for **geothermal lease sales** (with expected revenue of $23 million). And it includes portions of the Public Land Renewable Energy Development Act (H.R. 1994), providing for **sharing of revenues from renewable energy projects with counties and states** where the projects are located. Fifty percent of bonus bids, rentals, fees, permits and leases would be evenly divided between the state and county beginning January 1. Currently 100% of that revenue goes to the federal government. It also includes a provision that allows the Secretary of Interior to reduce fees for solar and wind projects on BLM land.	Senate Byrd Update: Following a ruling from the the Senate Parliamentarian, updated Senate ENR text no longer includes ● Increased fees for renewable energy projects on federal lands. ● Revenue sharing from renewables projects on federal land with state and county governments ● Required federal geothermal lease sales.

Sale of Forest Service and BLM Lands	Not included.	Senate Byrd Update: An updated Senate ENR proposal **forces the sale of between 1-2 million acres of Bureau of Land Management lands in 11 Western states** over the next five years, and it gives the secretary of agriculture broad discretion to choose which places should be sold off. The Senate Parliamentarian had ruled that a prior version of this language, which also included Forest Service lands, violates the Byrd Rule.
Timber Contracts	Requires the **U.S. Forest Service** (under the Department of Agriculture) to enter into long-term timber contracts in each of its regions and to increase timber harvests by 25%.	Senate ENR proposal **requires the Forest Service and BLM to conduct increased timber sales** of 250 million and 20 million board feet per year, respectively.
California Water Storage Projects	Provides the **$2B for California water storage projects**.	Senate Update: Updated Senate ENR proposal **provides $1B** (change from $500M) for construction and associated activities that restore or increase the capacity or use of existing conveyance facilities constructed by the Bureau of Reclamation.
Endangered Species Act	Not included.	Senate EPW proposal would **cut funding for Endangered Species Act recovery plans**.

Council on Environmental Quality (CEQ) Programs

Current Law	HR1	Senate Text
National Environmental Policy Act (NEPA)	Makes changes to the **National Environmental Policy Act** (NEPA). It allows companies to pay to receive expedited project approvals, and would allow companies to conduct their own reviews. These fast-tracked projects would be **exempt from judicial review**.	Senate Update: Updated Senate EPW text includes an **'opt-in fee' mechanism for expedited review under the National Environmental Policy Act** (NEPA), when a project sponsor pays a fee equivalent or greater than 125% of the cost to prepare an environmental assessment or impact statement. A prior version of EPW text allowed project sponsors that pay the fee to also avoid judicial review, but this was removed after the Senate Parliamentarian ruled that it violated the Byrd rule.. In addition, a prior provision that deemed offshore oil and gas projects as automatically compliant with NEPA was removed after it was also deemed to violate the Byrd Rule.
White House Council on Environmental Quality	H.R. 1 would rescind **general funding for the White House Council on Environmental Quality** to train staff, do environmental reviews, and improve stakeholder and community engagement. This was not touched by the House bill.	Senate EPW text would rescind **general funding for the White House Council on Environmental Quality** to train staff, do environmental reviews, and improve stakeholder and community engagement. This was not touched by the House bill.

National Oceanic & Atmospheric Administration (NOAA) Programs

Current Law	HR1	Senate Text
National Oceanic and Atmospheric Administration (NOAA)	**Rescinds unobligated IRA funding for the National Oceanic and Atmospheric Administration** (NOAA).	Senate Commerce text proposes **even greater cuts to unobligated NOAA IRA program funds**, estimated at $193 million, for coastal resilience, national marine sanctuaries, environmental reviews, and atmospheric research and weather forecasting.

Department of Housing and Urban Development (HUD) Programs

Current Law	HR1	Senate Text
Green and Resilient Retrofit Program	**Rescinds unobligated funding for the Green and Resilient Retrofit Program (GRRP)** for multifamily housing.	The Senate Banking Committee proposal includes the **same GRRP funding rescission provision** and identifies savings of $138 million.

General Services Administration (GSA)

Current Law	HR1	Senate Text
GSA IRA Programs	Rescinds unobligated balances for GSA IRA programs (collectively approx. $2B), including: ● **GSA Assistance for Federal Buildings** ● **Use of Low-Carbon Materials** ● **GSA Emerging Technologies**	The Senate EPW proposal also **rescinds unobligated balances for these programs**

US Postal Service	Not included	Senate Byrd Update: The Senate Homeland Security & Government Affairs Committee (HSGAC) **no longer requires the GSA Administrator to facilitate the sale of all USPS electric vehicles (approx. 7,200) and EV charging infrastructure** purchased under the IRA. The Senate Parliamentarian ruled that this provision violates the Byrd Rule and therefore it will likely not be included in the final Senate reconciliation bill.

Regulations from the Executive in Need of Scrutiny (REINS) Act

Provision	HR1	Senate Text
Regulations from the Executive in Need of Scrutiny (REINS) Act	Includes a version of the **Regulations from the Executive in Need of Scrutiny (REINS) Act**, which would repeal existing and proposed agency regulation unless Congress votes to approve it within the next five years. This proposal would unconstitutionally allow a single chamber of congress to veto decades of federal protections, which were rigorously designed through public, science-based processes Because these provisions are far outside the bounds of a budget bill, they are expected to be eliminated under the Senate's Byrd Rule.	Senate Byrd Update: The Senate Parliamentarian has ruled that this provision violates the Byrd Rule and therefore it will likely not be included in the final Senate reconciliation bill.