

Common Themes and Issues Seen in Concept Papers Submitted in § 48C(e)

Background

The Department of Energy (DOE), on behalf of the Internal Revenue Service (IRS), received a large number of meritorious concept paper submissions for Round 2 of the § 48C(e) Qualifying Advanced Energy Property Credit Allocation Program (Program). While many concept papers described meritorious and eligible projects, and DOE encouraged many of the applicants submitting those concept papers to submit § 48C(e) applications, DOE observed common issues, areas frequently needing improvement, frequent eligibility issues, and other themes during its review of the Round 2 concept papers. This document, which builds upon observations documented following [Round 1 concept paper submissions](#), [48C Application Round 1 Best Practices \(energy.gov\)](#) highlights common themes and issues meant to assist potential applicants with understanding why DOE may have discouraged them from submitting § 48C(e) applications. The document also aims to enable all potential applicants to address common issues and to ensure the best quality applications that comply with § 48C requirements and applicable guidance. This document does not address specific projects.

This document is not a comprehensive guide for the Program, and applicants are reminded to read [IRS Notice 2024-36](#), including [Appendices A & B](#) for guidance regarding the Program and its application process. Additionally, DOE and IRS published answers to applicants' questions, which can be found at [Qualifying Advanced Energy Project Credit \(48C\) Program](#) and [Frequently asked questions about the Qualifying Advanced Energy Project \(48C\) Credit](#). Applicants are also reminded to see IRS Notice 2024-36 Appendix A for a comprehensive list of qualifying advanced energy projects; IRS Notice 2024-36 Appendix B, Section 2.3.3 for a list of priority areas for the Clean Energy Manufacturing and Recycling category of the Program; and U.S. Department of Energy Releases 2023 Critical Materials Assessment to Evaluate Supply Chain Security for Clean Energy Technologies for the list of critical materials eligible under the Critical Materials project category in Round 2.

If your organization chooses to submit a § 48C(e) application, **which you may do whether your organization received a letter of encouragement or discouragement**, DOE and IRS recommend that you read through this document and IRS Notice 2024-36 (including Appendix A, portions of Appendix B relating to § 48C(e) applications, and, as relevant, the list of eligible § 48C(e) Energy Community Census Tracts in [Appendix C](#)) for issues that may apply to your submission. DOE and IRS highly recommend that applicants pay close attention to the sections below which are organized thematically. Further, several sections in this document correspond to the feedback bullet points provided in their letters of encouragement or discouragement, which are noted with “*”. Potential applicants are encouraged to read through this entire document for themes relevant to your concept paper submissions.

Glossary of Terms:

Specified Advanced Energy Property: A specific category of property listed in § 48C(c)(1)(A) and described in further detail in Appendix A, Section 1.1. Clean Energy Manufacturing and Recycling Projects under § 48C(e) must either produce or recycle one or more specified advanced energy properties. For example, solar glass would be considered a specified advanced energy property covered under Appendix A, Section 1.1(a). See IRS Notice 2024-36 Appendix B, Section 2.2 “Glossary of Terms”.

Concept Paper Submission Process and Contents

1. 48C Portal submission process

- For each project for which a taxpayer seeks an allocation of § 48C credits in Round 2, the taxpayer must use the 48C Portal to submit to the IRS (1) a concept paper for DOE consideration; and (2) a joint application for DOE recommendation and for IRS § 48C(e) certification (§ 48C(e) application). We encourage applicants to read the [48C Portal Applicant User Guide](#) for help with the submission process on 48C Portal. If you require further assistance, feel free to contact the Support Desk at 48CQuestions@hq.doe.gov or by calling 202-586-9786. Support Desk hours of operation are 8 AM to 5 PM Eastern, Monday through Friday, excluding holidays. Emails received outside of those hours will be processed the following business day.

2. Inconsistent or incomplete information submitted in the 48C Portal, Concept Paper, and/or Data Sheet.

- Some applications included inconsistent information in the 48C Portal, concept paper, and/or datasheet. Common examples of inconsistent data include, but are not limited to, project category, tax credit amount requested, energy community status, company name, and zip code for the facility. When fields appear in multiple documents or forms, it is important that applicants provide consistent information. In the § 48C(e) application stage, in case of any discrepancy between the 48C Portal, application narrative, and the Excel data sheet, **information in the Excel data sheet will be considered as final and definitive by DOE and IRS in their deliberations and notifications. (This will include important data fields such as requested tax credit, energy community status, and facility zip code).**
- Many applicants improperly formatted dollar values, often by using abbreviations or spelling out units instead of using number formatting (e.g., writing out 26.4 million dollars). All dollar values should be specified in numerals only (e.g., 26,400,000.00).

3. Lack of sufficient detail in one or more of the following documents that were required by IRS Notice 2024-36: Concept Paper and/or Data Sheet provided by DOE.*

- See IRS Notice 2024-36, Appendix B, Section 2.4 and concept paper templates and data sheets available at 48C Portal for documents and information that were required for the concept paper and § 48C(e) application submissions.
- For Round 2, there were several common areas where applicants did not provide sufficient detail in their concept paper submissions. These include:
 - Some **project abstracts** were found to be incomplete or provide limited information. Abstracts should be complete and descriptive as this narrative plays an important role in helping clearly communicate the nature of the project as well as its impact. In the § 48C(e) application phase of Round 2, the abstract field will have a character limit of 6,000 characters (including spaces); applicants are encouraged to use most or all available space.
 - For Clean Energy Manufacturing and Recycling Projects, some applicants provided little to no description of the project scope and product produced at the facility. Applicants should clearly state the output(s) (i.e. product(s), component(s), etc.) that their facility will produce. In some cases, applicants used vague or general terms or alluded to multiple components being produced without specific details. For example, stating that the facility will produce “electric grid components” is not sufficient detail. In this example, applicants must specify exactly which types of grid components will be produced at the facility.

- Applicants submitting multiple applications for different projects did not always clearly distinguish the projects from one another. In the § 48C(e) application, applicants should ensure that projects are clearly differentiated and clearly explain the distinctions between the projects (e.g., noting the differences, if any, of the specified advanced energy property and/or facility product, if producing different components, different scale of production, additional production, unique workforce and community engagement considerations, etc.).
- 4. Some applicants submitted concept papers when they had not yet determined the project location and/or proposed multiple possible locations for one project.**
- There were applicants who, at the concept paper stage, were still determining the location of their facility. Each application may only be for one facility (i.e., location). Please see prior FAQs (for example, [48C FAQs - July 3, 2024](#); [IRS website -Frequently Asked Questions](#)) on this topic. The location of the project facility must be finalized by submission of the § 48C(e) application. This is especially important for applicants deciding whether to locate their facility in a § 48C(e) energy community versus a non-energy community location. DOE will consider whether the proposed project is located in a § 48C(e) energy community as part of its determination as to whether to recommend a project for an allocation. This consideration is necessary in order to ensure compliance with the statutory requirement that not greater than \$6 billion may be allocated to qualified investments which are not located within an energy community census tract.

Project Eligibility and Selected Project Category

- 5. Failure to meet the criteria for an eligible qualifying advanced energy project, as described in IRS Notice 2024-36 Appendix A, in the project category/topic selected, as demonstrated in the project description or narrative by the applicant.***
- **If an applicant’s encourage or discourage notification cited eligibility concerns based on their concept paper, applicants must address these concerns in their § 48C(e) application.** If the eligibility concerns are not clearly addressed, the project may be deemed ineligible during review of the application.
 - **Lack of clear description of proposed project:** A project described in an application can only be deemed eligible under § 48C(e) if it clearly describes the project activities included in the qualified investment, including but not limited to:
 - The facility involved, and whether the project is re-equipping, expanding, or establishing that facility. (In the case of an Industrial Decarbonization project, the project may only re-equip an existing facility.)
 - The specific activities supported by the project’s qualified investment, including procurements, installation of equipment, and other activities at the facility; what the facility will produce, and what key inputs are needed for the manufacturing or recycling process.
 - See IRS Notice 2024-36 Appendix B, Section 2.5 “Stage 2, 48C(e) Application Guidance” for detailed information on content requirements for the § 48C(e) application for each project category, including information describing the proposed project.

6. Eligibility Concerns Related to Clean Energy Manufacturing and Recycling Projects (Notice 2024-36, Appendix A, Section 1.1)

- **Deployment of power generation facilities:** Projects that construct or expand power generation facilities are not eligible Clean Energy Manufacturing and Recycling projects under IRS Notice 2024-36 Appendix A, Section 1.1(a) (“Property designed to be used to produce energy from the sun, water, wind, geothermal deposits”) or Appendix A, Section 1.1(i) (“Other advanced energy property designed to reduce GHG emissions as may be determined by the Secretary”). Instead, eligible manufacturing projects related to power generation must re-equip, expand, or establish a facility that, after being placed in service, will manufacture products (e.g., equipment or components) that can be installed in power generation facilities. Eligible recycling projects must re-equip, expand, or establish a facility that recycles those power generation products. While projects building or expanding power generation facilities are not eligible under the 48C Program, they may be eligible for other tax credits through the IRS or financial assistance programs at DOE, such as the Title 17 Clean Energy Financing Program through DOE’s Loan Programs Office.
- **Deployment of facilities that produce fuels (such as biofuels or hydrogen), chemicals, or other industrial feedstock products:** Projects that re-equip, expand, or establish facilities that produce fuels, chemicals, or other feedstock products are not eligible Clean Energy Manufacturing and Recycling Projects, per IRS Notice 2024-36 Appendix A, Section 1.1(e) (“Equipment designed to refine, electrolyze, or blend any fuel, chemical, or product which is renewable, or low-carbon and low-emission”). Instead, eligible projects in this area must re-equip, expand, or establish a facility that, after being placed in service, will manufacture or recycle equipment that can be installed in other facilities to produce fuels, chemicals, or other feedstock products. For example:
 - A project that builds a biorefinery or hydrogen production facility, or that *procures* or *installs equipment* for a biorefinery or hydrogen production facility, is not eligible as a Clean Energy Manufacturing and Recycling project.
 - A project whose proposed qualified investment includes the cost to produce, procure, or install biorefinery components or electrolyzers, whether mass-produced or first-of-a-kind, is not eligible as a Clean Energy Manufacturing and Recycling project.
 - A project that re-equips, establishes, or expands a facility which, after completion of the project, will *produce* components or other equipment of a biorefinery, hydrogen production facility, or other facility that produces qualifying fuels, chemicals, or other products under IRS Notice 2024-36 Appendix A, Section 1.1(e) is eligible as a Clean Energy Manufacturing and Recycling project.

While projects that build or expand production facilities for fuels or chemicals products are not eligible under 48C(e) program, they may be eligible for other tax credits through the IRS or financial assistance programs at DOE, such as the Title 17 Clean Energy Financing Program through DOE’s Loan Programs Office.

- **Deployment of facilities that produce low-carbon fuels (such as biofuels or hydrogen).** Projects that re-equip, expand, or establish facilities that produce low-carbon fuels are not eligible Clean Energy Manufacturing and Recycling Projects, per IRS Notice 2024-36 Appendix A, Section 1.1(i) (“Other advanced energy property designed to reduce greenhouse gas emissions as may be determined by the Secretary.”). The expansion in the guidance to include low carbon materials in Round 2 of the program does not include the production of

low-carbon fuels. Eligible advanced energy properties in this lower carbon intensity energy properties category include energy-intensive materials that have a substantially lower carbon intensity when compared to an appropriate industry-specific benchmark. These materials must not be derived from primary feedstocks such as palm fatty acid distillates or fossil fuels including coal, natural gas, and petroleum.

- **Deployment of carbon capture, removal, use, or sequestration (CCUS) technologies submitted under the Clean Energy Manufacturing and Recycling category:** For projects submitted under the Clean Energy Manufacturing and Recycling category, projects that procure, produce, or install property (equipment or components) designed to capture, remove, use, or sequester carbon oxide emissions are not eligible. Instead, eligible manufacturing projects in this category must re-equip, expand, or establish a facility that, after being placed in service, will manufacture or recycle equipment (e.g., equipment or components) designed to capture, remove, use, or sequester carbon oxide emissions. The installation of CCUS equipment at existing facilities may be eligible under the Industrial Decarbonization category (see IRS Notice 2024-36 Appendix A, Section 1.2).
- **Uranium enrichment, conversion, and deconversion:**
 - Projects re-equipping, expanding, or establishing facilities that, once placed in service, would manufacture equipment that could be used in facilities to enrich, convert, or deconvert uranium are eligible under the Clean Energy Manufacturing and Recycling category. However, projects re-equipping, expanding, or establishing facilities that would themselves be used in the enrichment, conversion, or deconversion of uranium are not eligible. Similarly, projects that procure or manufacture equipment that would be used in the enrichment, conversion, or deconversion of uranium are not eligible. See IRS Notice 2024-36 Appendix A, Section 1.1(i).
 - If applicants who submitted concept papers with uranium enrichment, conversion, or deconversion projects described as ineligible above choose to submit § 48C(e) applications, they are encouraged to limit the proposed activities to the eligible activities described above in the Clean Energy Manufacturing and Recycling Category.

7. Eligibility Concerns Related to Industrial Decarbonization Projects (Notice 2024-36, Appendix A, Section 1.2),

Note that in Round 1, the Industrial Decarbonization Project category was referred to as “Greenhouse Gas Emissions Reduction Projects.” The updated project category name in Round 2 is a change in terminology only, and is designed to avoid confusion with the second technical review criterion. An advanced energy project qualifies under this category if it involves retrofitting an industrial or manufacturing facility, particularly in energy-intensive sectors such as cement, iron and steel, aluminum, and chemicals. The retrofit must include the installation of equipment specifically designed to reduce greenhouse gas emissions by at least 20 percent.

- **Industrial Decarbonization projects that build new or expand existing facilities:** Projects proposed under the Industrial Decarbonization category must re-equip an existing industrial or manufacturing facility with equipment designed to reduce GHG emissions, as described in IRS Notice 2024-36 Appendix A, Section 1.2. Projects that include in their qualified

investment the cost of building a new facility or expanding a facility's production capacity are not eligible in the Industrial Decarbonization category. Similarly, projects that propose changes to the design of a new facility are also not eligible.

- **Industrial Decarbonization projects that propose energy-as-a-service models:** As described in the FAQ, the registration process for the Qualifying Advanced Energy Project Credit (48C(e)) Program requires that an individual create and submit applications on behalf of an organization (applicant) that owns, or will own, the property for which the tax credit will be claimed. To be eligible to register and submit an application for an organization, the individual must have authority to act on behalf of, and legally bind, the organization that owns, or will own, the relevant property. The individual will be required to attest that they have authority to legally bind the organization. Additionally, this individual will be responsible for signing attestations for the organization, within the application, and will receive all communications for the organization. See question 8 of FAQs posted on June 10, 2024. ([48C FAQs - July 3, 2024](#))

8. Eligibility Concerns Related to Critical Materials Projects (Notice 2024-36, Appendix A, Section 1.3)

- **Critical Materials Processing, Refining, and Recycling projects:** Any activities equipping a facility to drill, pump, or use other means to extract resources would be ineligible for inclusion in a § 48C project's qualified investment, as these activities occur upstream of processing and refining. Subsequent steps in the process of producing the critical material, such as physical refining (e.g., filtration, separation, and other techniques) and chemical or thermal treatment, would be eligible for inclusion in the project's qualified investment.
- **Uranium enrichment, conversion, and deconversion:**
 - Uranium is not listed in [Final 2023 Critical Materials List](#) as a critical material and is not an eligible critical material under Critical Materials Projects (IRS Notice 2024-36, Appendix A, Section 1.3).
 - For additional eligibility considerations, see "Uranium enrichment, conversion, and deconversion" under "6. Eligibility Concerns Related to Clean Energy Manufacturing and Recycling Projects" above.

9. Additional eligibility considerations

- **Research and Development Facilities:** Facilities or portions of facilities that conduct research and development are not eligible under § 48C. Facilities that manufacture eligible property and, in doing so, are also used for research and development purposes, may be eligible under § 48C, but the application must demonstrate that the facility built, re-equipped, or expanded is a § 48C Facility as defined under IRS Notice 2024-36. Applications will be evaluated according to the criteria in IRS Notice 2024-36 Appendix B, Section 2.7.1, which are intended for facilities that produce or recycle specified advanced energy property under the Clean Energy Manufacturing and Recycling project category.

10. The described project may more appropriately align with a different project category than the submitted project category.*

(Note: In this context, “project category” refers to the 3 eligible § 48C project categories: Clean Energy Manufacturing and Recycling, Critical Materials, and Industrial Decarbonization. Categories in this context do NOT refer to other groupings such as the specified advanced energy property.)

- Some concept papers were submitted in a project category where the projects could be ineligible. For example:
 - A project that retrofits an existing industrial facility to reduce greenhouse gas (GHG) emissions would be considered ineligible if submitted under the Clean Energy Manufacturing and Recycling category, but eligible if submitted under the Industrial Decarbonization project category.
 - A project that refines or processes a critical material could be considered ineligible if submitted under the Clean Energy Manufacturing and Recycling project category but could be eligible if submitted under the Critical Materials project category.
 - A project that retrofits or establishes a new facility to produce low carbon materials could be considered ineligible if submitted under the Industrial Decarbonization project category but could be eligible if submitted under the Clean Energy Manufacturing and Recycling project category.
 - It is applicant’s responsibility to differentiate § 48C qualified investment and project scope eligibility if it is considered as part of larger project.
- For purposes of technical review of Round 2 concept papers, DOE considered the project in a more appropriate category, as stated in the encouragement or discouragement letter in the 48C Portal to provide feedback. For example, a low carbon material project submitted under the Industrial Decarbonization project category was evaluated against other low carbon material projects correctly submitted under the Clean Energy Manufacturing and Recycling project category, and the applicant’s encourage or discourage letter indicated that their project was likely submitted under the wrong project category. **DOE will not adopt this practice in the § 48C(e) application stage. Instead, each project will be considered in the category chosen by the applicant, and its eligibility will be determined under that project category.**
- **It is the applicant’s responsibility to determine the most applicable qualifying advanced energy project category**, according to the guidance in Appendix B, section 2.8.2, Determining an Application’s Project Category. Submissions by applicants must be eligible in the § 48C category (the “topic” dropdown list in the 48C Portal) selected by the applicant. If an applicant chooses to submit a § 48C(e) application, they may update the project category in the 48C Portal. In the application stage, a project will be considered ineligible if it is ineligible in the category selected by the applicant - even if the project may have been eligible under a different § 48C project category.

The described project was determined to be ineligible under the project categories considered.

- As stated above, if a project was submitted under the wrong category in the concept paper stage, DOE evaluated it under a more appropriate category during the technical review process to provide feedback (e.g., a low carbon material project submitted under the Industrial Decarbonization project category was evaluated against other low carbon material projects correctly submitted under the Clean Energy Manufacturing and Recycling project

category). For these projects, if applicants also received feedback in their encourage or discourage letter that the project was ineligible, the project was determined to be ineligible under the new project category. That is, the project was not found to be eligible under any project category.

Qualifying Investments

11. Proposed qualified investment appears to include costs not eligible for inclusion in a qualified investment.*

- See IRS Notice 2023-18 section 5.04, and discussion of qualified investment in IRS Notice 2023-44, including section 3.01 (“Section 48C Facility”) and Appendix A (“Qualifying Advanced Energy Projects”). It is applicant’s responsibility to determine the qualified portion of the project investment and the requested tax credit. IRS or DOE cannot provide tax advice or guidance on determining the qualified investment.
- **Construction or expansion of a building:** The qualified investment proposed by an applicant, which may be a portion of an overall project carried out by the applicant, cannot include the construction or expansion of a building or its structural components. Applicants that included expenses for constructing or expanding buildings in their qualified investment should remove such costs from the qualified investment in their § 48C(e) application. See IRS Notice 2023-44, section 3.01(2) for more information.
- **Portion of facility used to produce or recycle eligible property (specified advanced energy property):** If only a portion of a facility will be used to produce or recycle eligible property as described in IRS Notice 2024-36 Appendix A, then the qualified investment proposed in the § 48C(e) application should only include costs for the portion of the facility that will be used to produce or recycle eligible property.
- **Industrial Decarbonization projects that build new or expand existing facilities:** Projects proposed under the Industrial Decarbonization category must re-equip an existing industrial or manufacturing facility with equipment designed to reduce GHG emissions, as described in IRS Notice 2024-36 Appendix A, Section 1.2. The qualified investment proposed by a project must therefore re-equip the industrial or manufacturing facility to reduce GHG emissions, and investments to expand that facility (e.g., with additional manufacturing capacity), are not eligible costs to include in the qualified investment. For concept papers that included such ineligible costs, those ineligible costs must be removed from the qualified investment in the Round 2 § 48C(e) application.
- For projects related to manufacturing in offshore wind ports, typically, not all expenses associated with infrastructure upgrades will be eligible to be considered part of the project’s qualified investment. Applicants are encouraged to refer to § 48C guidance on qualified investment eligibility, and to clearly differentiate between the work and expenditures that comprise the qualified investment versus projects costs which are not being claimed as part of the qualified investment.

Technical Review Criteria

12. It does not appear that the project will be permitted or placed in service within the required timeframes.*

- See IRS Notice 2023-44, section 5.03 and Appendix B(I)(e)(v).

As described in IRS Notice 2023-44, section 5.03 and Appendix B(I)(e)(v), applicants who receive an Allocation Letter for a credit must provide documentation to DOE within 2 years of receiving the allocation demonstrating that they have received necessary permits and met other requirements of the Program. After receiving a subsequent certification letter from the IRS, applicants will have an additional 2 years to place the proposed facility in service and notify DOE that the facility has been placed in service within the 2-year period. Applications demonstrating evidence of timelines that would not meet these timeframe requirements are highly unlikely to receive an allocation.

13. Applicant did not sufficiently demonstrate likelihood of commercial viability of a proposed project. (Criterion 1: Commercial Viability)*

- See “Criterion 1: Commercial Viability” in IRS Notice 2024-36, Appendix B, Section 2.7.1 Clean Energy Manufacturing and Recycling projects and Critical Materials Projects; Appendix B, Section 2.7.2 for Industrial Decarbonization projects.

14. Applicant did not sufficiently demonstrate likelihood of net impact on avoiding or reducing anthropogenic emissions of greenhouse gases of a proposed project. (Criterion 2: Greenhouse Gas Emissions Impacts)*

- See “Criterion 2: Greenhouse Gas Emissions Impacts” in IRS Notice 2024-36, Appendix B, Section 2.7.1 Clean Energy Manufacturing and Recycling projects and Critical Materials Projects; Appendix B, Section 2.7.2 for Industrial Decarbonization projects.

15. Applicant did not sufficiently demonstrate likelihood of the proposed project’s ability to strengthen U.S. supply chains and domestic manufacturing needed for a net-zero economy. (Criterion 3: Strengthening U.S. Supply Chains and Domestic Manufacturing for a Net-Zero Economy)*

- See “Criterion 3: Strengthening U.S. Supply Chains and Domestic Manufacturing for a Net-Zero Economy” in IRS Notice 2024-36, Appendix B, Section 2.7.1 Clean Energy Manufacturing and Recycling projects and Critical Materials Projects; Appendix B, Section 2.7.2 for Industrial Decarbonization projects.

Components not specialized for an eligible clean energy product: Eligible components proposed under the Clean Energy Manufacturing and Recycling category should generally be specialized components required for eligible clean energy products. Non-specialized components that are used broadly for products beyond those eligible under § 48C are likely to score low when evaluated against the § 48C evaluation criteria in IRS Notice 2024-36. **Lack of need for § 48C credit:** A concept paper may have scored low on the “Strengthening U.S. Supply Chains and Domestic Manufacturing for a Net-Zero Economy” review criterion if it did not demonstrate that a § 48C tax credit is needed for the project to move forward or would significantly expand domestic manufacturing beyond what would occur without the credit. Applicants might consider other programs that may provide support tailored to their projects, such as loans and loan guarantees offered by DOE’s Loan Programs Office. If a § 48C tax credit is needed to move a project forward in its proposed form, the applicant should work to demonstrate the need and to explain the differential impact to manufacturing capacity that would be enabled by a § 48C tax credit.

16. Applicant did not sufficiently demonstrate the workforce benefits and completed/proposed community engagement of the proposed project. (Criterion 4: Workforce and Community Engagement)*

- See “Criterion 4: Workforce and Community Engagement” in IRS Notice 2024-36, Appendix B, Section 2.7.1 Clean Energy Manufacturing and Recycling projects and Critical Materials Projects; Appendix B, Section 2.7.2 for Industrial Decarbonization projects.
- As described in IRS Notice 2024-36, the Workforce and Community Engagement portion of the submission should be specific to the applicant’s proposed project and provide more detail about the project-specific activities than general company commitments to workforce and community engagement.
- As described in IRS Notice 2024-36, the Workforce and Community Engagement portion of the submission should speak to how the project may be supporting transition opportunities for displaced workers in coal, automotive, or other industrial sectors. This evaluation criterion is relevant to all projects, not just projects located in § 48C(e) Energy Communities.

Additional Common Themes

17. Applicants submitted a concept paper for a project that received an allocation in Round 1 of the 48C Program.

- If an applicant applies in Round 2 for a project that is the same, similar, or related to a project that received a 48C allocation in Round 1, they must communicate the distinction, if any, between the two projects. Specifically, DOE asks that the applicant clearly differentiate the two qualified investments and state the relationship, if any, between the two projects. A field has been added to the § 48C(e) application data sheet, in the Project Overview tab (“48C Round 1 allocation”), where applicants can provide this information. Applicants are also encouraged to elaborate in their narrative application.

18. Specific considerations for projects located in § 48C(e) Energy Community Census Tracts

- Applicants that indicated in their concept paper submission that their project is located in a § 48C(e) Energy Community Census Tract must confirm that their proposed project is located in such a § 48C(e) Energy Community Census Tract using the resources described in Question 5 at [Frequently asked questions about the Qualifying Advanced Energy Project \(48C\) Credit | Internal Revenue Service \(irs.gov\)](#). For a concept paper submission that indicated its proposed project is located in a § 48C(e) Energy Community Census Tract, the project location in the § 48C(e) application must be located in a confirmed § 48C(e) Energy Community Census Tract to be considered for a Round 2 allocation.
- Some applicants did not sufficiently address the workforce and community engagement technical review criteria. Please refer to IRS Notice 2024-36, Appendix B Section 2.7 for additional details.