

September 27, 2023

Amy Coyle
Deputy General Counsel
Council on Environmental Quality
730 Jackson Place NW
Washington, DC 20503

Re: Proposed Rule, Council on Environmental Quality, "National Environmental Policy Act Implementing Regulations Revisions Phase 2," 88 Fed. Reg. 49924 (July 31, 2023)

Dear Ms. Coyle,

The Energy Workforce & Technology Council respectfully requests an extension of the comment period of at least 45 days for the Council on Environmental Quality's Proposed Rule, "National Environmental Policy Act Implementing Regulations Revisions Phase 2," 88 Fed. Reg. 49,924 (July 31, 2023).

The Energy Workforce & Technology Council is the national trade association for the energy services and technology sector representing over 370 member companies and 650,000 workers in the United States. Like the rest of the energy sector, the companies that comprise our membership are diverse in size, scope, and governance models. Our members represent the spectrum from private sole proprietorships to publicly held companies with thousands of employees.

CEQ has put forth a complex regulation with wide-ranging implications for both large and small projects and activities within the federal review process. Given its extensive reach, the current comment period falls short in providing adequate time for assessment.

CEQ's proposed regulations could significantly influence the way agencies evaluate energy projects. Additionally, as written, this regulation would influence all NEPA processes initiated after the final rule's effective date and could also affect any ongoing activities and environmental documents initiated prior to the final rule's enactment. This would directly impact projects and activities Energy Workforce companies are involved in, as the servicers, manufacturers and suppliers of NEPA reviewed projects.

The extensive nature of the proposed requirements and their potential impacts necessitates an extension of the timeline, allowing Energy Workforce and the broader energy industry adequate time to offer more comprehensive and constructive feedback. Extending the comment period by 45 days would afford Energy Workforce and the industry the opportunity to provide the comprehensive analysis and input a regulation of this significance requires.

Thank you for your consideration of this request, and Energy Workforce looks forward to engaging with CEQ as this proposed rule is reviewed.

Sincerely,



Tim Tarpley
President
Energy Workforce & Technology Council