

To: Public Comment File – Docket No. OCC–2023–0008

From: Carl Kaminski, Assistant Director, Bank Advisory

Date: January 18, 2024

Subject: Meeting with Representatives from the American Council on Renewable Energy ("ACORE"), American Clean Power ("ACP"), Solar Energy Industries Association ("SEIA"), Avangrid, JP Morgan Chase & Co., NextEra Energy, Invenergy, and US Bank to discuss: Notice of Proposed Rulemaking: "Regulatory Capital Rule: Large Banking Organizations and Banking Organizations with Significant Trading Activity"

Staffs of the Federal Deposit Insurance Corporation, Federal Reserve System, and Office of the Comptroller of the Currency (collectively, the "agencies") met with representatives from the renewable energy sector and two financial institutions (collectively, the "renewable energy sector representatives") regarding the agencies' Notice of Proposed Rulemaking on Regulatory Capital Rule: Large Banking Organizations and Banking Organizations With Significant Trading Activity (the "NPR"), which was published in the Federal Register on September 18, 2023 (88 FR 64028). As a follow-up to the parties' meeting of September 28, 2023, the renewable energy sector representatives discussed their comment letter and the impact of the NPR on the renewable energy sector, encouraged the agencies to reconsider the risk weight proposed for tax equity investments, and provided additional information about the historical performance of tax equity investments in the renewable energy sector.

Attendees

OCC	Margot Schwadron Venus Fan Andrew Tschirhart Diana Wei Carl Kaminski	
FDIC	Adam Casella Benedetto Bosco Catherine Wood Richard Smith Anjoly David Ernest Barkett Olga Lionakis	

	Lauren Brown Andrew Carayiannis Iris Li Michael Maloney David Riley Huiyang Zhou Keith Bergstresser
Federal Reserve Board	Andrew Willis Brian Chernoff Mark Buresh David Imhoff Cecily Boggs Sarah Dunning Alice Moore Anna Lee Hewko Isabel Echarte Jasmin Keskinen Matthew McQueeney Ryan Rossner Shooka Saket Lucy Chang Christopher Appel David Alexander
ACORE	Lesley Hunter Jose Zayas
American Clean Power	Gene Grace (ACP)
Solar Energy Industries Association	Sean Gallagher Ben Norris
Avangrid	Sarah Garman
JP Morgan	Rubiao Song
NextEra Energy	Michael Dunne

Phil Musser (NextEra Energy)

Invenergy	Andrew Wills
US Bank	Adam Altenhofen