U.S. Chamber of Commerce

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Robby S. Saunders
Deputy Assistant Secretary of Commerce for Technology Security
Office of Strategic Industries and Economic Security
Bureau of Industry and Security
U.S. Department of Commerce
1401 Constitution Ave NW
Washington, DC 20230

RE: "Notice of Request for Public Comments on Section 232 National Security Investigation of Imports of Wind Turbines and Their Parts and Components," Federal Register docket number 250818-0143 (XRIN 0694-XC133).

Dear Mr. Saunders:

The U.S. Chamber of Commerce ("the U.S. Chamber") appreciates the opportunity to respond to the U.S. Department of Commerce's request for comments cited above. The Administration has stated it intends to use these comments as part of an investigation to "determine the effects on the national security of imports of wind turbines and their parts and components."

Ample supplies of affordable electricity is itself a national security imperative, underpinning U.S. defense readiness, advanced manufacturing, and America's leadership in artificial intelligence. The renewable energy industry assists in addressing this imperative by helping to meet the nation's surging demand for electricity. The U.S. Chamber strongly supports all forms of energy that can contribute to the reliability and affordability of electricity. This is especially important as our electricity demand is increasing at unprecedented rates due to the imperative that America lead the world in the development of advanced technologies, manufacturing, and artificial intelligence. As such, the U.S. needs to utilize all of the power generation tools available—including natural gas, nuclear, wind, and solar—to support the highest levels of reliability while maintaining affordable electricity rates.

Wind energy, in particular, optimizes grid reliability and is critical to key districts in Iowa, Texas, and other states, including by supporting approximately 300,000 American workers throughout the wind energy supply chain. Blade, tower, and nacelle assembly plants are spread across more than a dozen U.S. states, ensuring geographic and supplier diversity that reduces dependence on any single foreign source. The economic impacts of trade restrictions would also be felt in rural

communities in which landowners and farmers depend on wind projects for income and in manufacturing hubs involving tens of thousands of jobs tied to the wind supply chain.

Amid rapidly growing electricity demand, culling wind power options from the broader suite of energy sources risks sending electricity prices higher across the country, among other potential unintended consequences. This submission explores the impacts trade restrictions would have on this important sector and urges the Administration to employ an all-of-government approach focused on strengthening domestic competitiveness and job creation rather than undermining the viability of a critical component to America's energy independence.

Limit Market Distortions in a Cost Competitive Sector

The cost competitiveness of onshore wind should not be overlooked. The deployment of onshore wind offers significant additional energy supply to meet growing demand at affordable rates. This is part of the reason why demand for wind energy in the U.S. is significantly increasing, with wind energy currently responsible for roughly 10% of U.S. electricity production, and is expected to continue this growth trend for years to come as domestic manufacturing increases and additional data centers come online to power artificial intelligence.

Prospective trade restrictions threaten to restrict this growth and reduce available energy for businesses, farmers, and consumers throughout the U.S. Moreover, any actions that serve to limit the availability of energy resources threaten to drive prices higher for consumers and businesses, undermining our nation's global competitiveness. The Chamber urges the Administration to focus on removing barriers to all forms of energy generally, and electricity generation in particular, including renewable sources, and avoid taking actions that could negatively impact its availability or cost. In this vein, directing federal attention to one type of electricity resource over others distorts the market, limits innovation, and undermines consumer choice.

Additionally, it is critical that the Administration consider the broader investment implications of potential trade restrictions. Hindering access to critical manufacturing components will not only impact future renewable projects but also hamper relevant research and development initiatives and existing facilities in need of repairs or replacements. Such restrictions would have a significant impact on investor confidence, especially with respect to companies that have taken steps to shift supply chains out of China, where only a small percentage of U.S.-bound wind components originate today.

Supply Chain and Industrial Base Considerations

As domestic capacity continues to ramp up—with more than 400 U.S. facilities supporting land-based and offshore wind industries—supply chains connected to trusted allies in North America, Europe, and South and Southeast Asia remain essential. Not only does access to reliable sources limit exposure to China and demonstrate strategic supply chain resilience, it also allows manufacturing to continue when components and parts are not available domestically. The evidence is clear that domestic manufacturing is increasing but is not yet sufficient to meet projected demand without reliance on certain imports.

Imports of nacelles and generators, for example, are largely sourced from Mexico and India. Additionally, wind turbines and parts have significant levels of U.S. content, especially blades and nacelles. Over the past three years, 40% of U.S. imports of wind turbines and all associated parts have come from Mexico. A large majority of the imported parts within the scope of this investigation are therefore imported under the U.S.-Mexico-Canada Agreement (USMCA). In addition to these markets, the wind industry remains diversified via U.S. and European (primarily German, Spanish, Danish and French) OEMs. These transatlantic OEMs are some of the largest suppliers to the U.S. market, with extensive manufacturing operations across the U.S. and Europe.

The implications of the Administration's other tariff regimes (i.e., Section 232 steel, aluminum, and derivative tariffs as well as the "reciprocal" tariffs imposed on most countries) are also worth considering. The steel and aluminum measures are especially impactful since relevant turbine components contain those metals. In this sense, this section of the defense industrial base is already subject to steep tariffs. Further tariffs and other restrictions on reliable sources in the wind supply chain will hurt the U.S. wind industry, and domestic power generation overall, by contracting manufacturing output and creating competitive opportunities for unreliable suppliers.

Renewable Energy is Already Supporting the American AI Boom

Electricity demand is projected to grow significantly in the coming years, driven by factors such as the expansion of data centers, the rise of artificial intelligence, and the increasing electrification of industries like manufacturing and transportation. This growth underscores the need for a reliable and affordable electricity supply to meet the demands of a modern economy. However, challenges such as regulatory delays and infrastructure limitations must be addressed to ensure that the expansion of our energy system aligns with the pace of innovation. Comprehensive permitting reforms and investments in critical infrastructure, including natural gas pipelines, renewable energy projects, and supportive transmission lines, are essential to maintaining grid

reliability and affordability while supporting the national security imperative of leading the world in artificial intelligence.

Wind energy has emerged as a key contributor to our energy grid, playing a vital role in diversifying the energy mix, supporting reliability, and mitigating electricity rate increases. In the United States, wind energy accounts for a growing share of approximately 10% of electricity generation, with its continuing expansion supported by advances in technology and related declining costs.

While onshore wind is well-established in many regions of the country, offshore wind also holds significant potential given the strong attributes of this type of wind energy resource, with significant investments and projects underway. The continued development of wind energy, alongside a diverse set of other types of electricity generation resources, coupled with supportive policies and enhanced and expanded transmission infrastructure, will be critical in meeting future energy demands. Renewable energy is a key contributor to meeting the American artificial intelligence boom. If the components and inputs necessary to support this vital energy resource are impaired from being available to support the expansion of the power grid, there will be one less source available to power AI innovation, potentially causing America to fall behind its international competitors.

Conclusion

The Administration must engage in an all-of-government approach to support domestic energy production and boost supply chain resilience with reliable partners. Punitive restrictions on imports from trusted allies would undermine, not advance, U.S. energy and national security. A forward-looking strategy focused on resilience, competitiveness, and permitting reform will ensure America meets its surging energy demand while maintaining global leadership in advanced technologies.

The U.S. Chamber appreciates the opportunity to submit these comments and looks forward to working with the Department of Commerce to address these important issues.

Sincerely,

John Murphy
Senior Vice President and Head of International
U.S. Chamber of Commerce