

ONE HUNDRED NINETEENTH CONGRESS

Congress of the United States

House of Representatives

COMMITTEE ON ENERGY AND COMMERCE

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WASHINGTON, DC 20515-6115

Majority (202) 225-3641

Minority (202) 225-2927

November 5, 2025

Lee Zeldin
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

Dear Administrator Zeldin:

Pursuant to Rules X and XI of the U.S. House of Representatives, the Committee on Energy and Commerce (Committee) is continuing its oversight of the Greenhouse Gas Reduction Fund (GGRF) program. The Committee shares the Environmental Protection Agency's (EPA) concerns about the GGRF program, including concerns about the use of an outside financial intermediary in a way that impacted the ability of EPA to conduct proper oversight and the potential conflicts of interest and political favoritism that was at issue when EPA selected the GGRF program grant recipients. Additionally, the Committee finds the potential for financial mismanagement particularly worrisome, as some of the grantees' previous revenues were only a small fraction of the GGRF funds they received, which raises questions about whether the grant recipients can adequately manage grant amounts that are significantly larger than their previously documented revenue.

As recommended by the Federal Bureau of Investigation (FBI), Citibank—the financial intermediary—placed an administrative freeze on the accounts associated with the GGRF grantees and stopped disbursing funds to the grantees in February 2025.¹ Shortly thereafter, EPA terminated the grant agreements to protect the funds from being misused.² The grantees subsequently sued Citibank, EPA, EPA Acting Deputy Administrator William McIntosh, and you after EPA terminated the grant agreements and sought a preliminary injunction barring EPA from terminating the grants and ordering Citibank to resume disbursements.³ While the District Court ruled in favor of the grantees, the Court of Appeals vacated the District Court's injunction

¹ Jean Chemnick, *EPA spending freeze continues despite court orders*, POLITICO (Feb. 4, 2025), <https://www.politico.com/news/2025/02/04/epa-spending-freeze-court-orders-00202253>; *Climate United Fund v. Citibank*, N.A., No. 25-5122 (D.C. Cir. 2025).

² *Administrator Zeldin Terminates Biden-Harris \$20B 'Gold Bar' Grants*, ENV'T PROT. AGENCY (Mar. 11, 2025), <https://www.epa.gov/newsreleases/administrator-zeldin-terminates-biden-harris-20b-gold-bar-grants>.

³ Diana DiGangi, *Climate United Fund sues EPA, Citibank over frozen \$7B*, ESGDIVE (Mar. 12, 2025), <https://www.esgdive.com/news/climate-united-fund-sues-epa-citibank-frozen-funds-ggrf/742280/>; *Climate United Fund et. Al. v. Citibank, N.A., et al.*, No. 25-cv-698 (D.C. Dis. 2025).

and remanded the case to the District Court for further proceedings.⁴ The Court of Appeals concluded that the District Court abused its discretion in issuing the injunction because (1) the grantees are not likely to succeed on the merits because their claims are essentially contractual, and therefore jurisdiction lies exclusively in the Court of Federal Claims; and (2) while the District Court had jurisdiction over the grantees' constitutional claim, that claim is meritless.⁵ The Court of Appeals reasoned that "on behalf of the public [EPA] must ensure the proper oversight and management of this multi-billion-dollar fund."⁶ Thus, the decision by the Court of Appeals confirms that you acted within your authority as Administrator to protect taxpayer money and that you took proper action by terminating the grantees' agreements to prevent ongoing abuse of federal funds.

In addition to terminating the grant agreements, earlier this year, EPA formally referred to the EPA Office of Inspector General (OIG) the "urgent and deeply concerning matters of financial mismanagement, conflicts of interest, and oversight failures within the [] GGRF."⁷ The Committee appreciates that you are also conducting a comprehensive review of the GGRF program.⁸ The Committee applauds EPA's oversight and accountability measures—despite the GGRF being created with limited oversight—and EPA's cooperation with the U.S. Department of Justice (DOJ) and FBI in their ongoing investigation.⁹

Alongside EPA, the Committee has been conducting oversight of the GGRF program since February. Specifically, on February 26, 2025, the Subcommittee on Oversight and Investigations held a hearing at which Members of the Committee raised concerns about EPA's historical challenges in grant oversight and the weaknesses of the GGRF program.¹⁰ Significant concerns included the GGRF's unusual structure, large funding amounts, speed of the awards process, and reports of potential conflicts of interest.¹¹ Additionally, on April 10, 2025, the Subcommittee sent letters to eight grant recipients—including the three National Clean Investment Fund (NCIF) program grant recipients and five Clean Communities Investment Accelerator (CCIA) program grant recipients—requesting information to further investigate the GGRF program.¹² As a result of the Committee's work and concerns with how taxpayer dollars are being spent, the Committee took further action in voting to repeal the underlying

⁴ *Climate United Fund v. Citibank, N.A.*, No. 25-5122 (D.C. Cir. 2025).

⁵ *Id.*

⁶ *Id.*

⁷ *EPA Formally Refers Financial Mismanagement of \$20B "Gold Bars" to Inspector General*, ENV'T PROT. AGENCY (Mar. 3, 2025), <https://www.epa.gov/newsreleases/epa-formally-refers-financial-mismanagement-20b-gold-bars-inspector-general>.

⁸ *Id.*

⁹ *Id.*

¹⁰ *Examining the Biden Administration's Energy and Environment Spending Push: Hearing Before the Subcomm. on Oversight and Investigations of the H. Comm. on Energy and Commerce*, 119th Cong. (2025).

¹¹ *Id.*

¹² *Chairmen Guthrie, Palmer, and Griffith Investigate Greenhouse Gas Reduction Fund Grant Recipients*, H. COMM. ON ENERGY AND COMMERCE (Apr. 11, 2025), <https://energycommerce.house.gov/posts/chairmen-guthrie-palmer-and-griffith-investigate-greenhouse-gas-reduction-fund-grant-recipients>.

authorization for the GGRF program and rescind all unobligated funds during the full Committee markup of budget reconciliation text in June.¹³

The Committee seeks to ensure that the federal government is a good steward of taxpayer dollars and to continue supporting EPA's efforts in combatting waste, fraud, and abuse within the GGRF program. To assist with the Subcommittee's investigation of GGRF and support the Administration's efforts, the Committee requests the following documents no later than November 19, 2025:

1. The complete grant file for the three NCIF grantees and the five CCIA grantees, including the application submitted by the organization with all supporting documentation and appendices, any additional information requested by EPA, and any memos on changes to the grant terms and conditions.
2. The scoring breakdown and rationale for each score for all the NCIF and CCIA applicants included in the final rankings lists for the top-ranked applications, including any changes to scoring or rescores and rationale for why those changes occurred.
3. Any checklist or guidance for EPA grants employees on what steps they should be taking to conduct appropriate pre-award due diligence and to ensure all required paperwork and documentation is submitted and verified. This should include briefing materials used to advise the Administrator, Deputy Administrator, Chief of Staff, General Counsel, Associate Administrator for Mission Support, and Associate Administrator for the Office of Air and Radiation about the selection of NCIF grantees and CCIA grantees.
4. Any reports received from Citibank or the U.S. Treasury regarding the account balances or transactions histories of the GGRF accounts for the three NCIF grantees and the five CCIA grantees and any of their sub-awardees.
5. Any progress reports received from the three NCIF grantees and the five CCIA grantees.
6. The names of all panel chairs, senior review panels, selection officials, and all individuals involved in the review panels for all the NCIF and CCIA applicants included in the final rankings lists for the top-ranked applications.

¹³ Full Committee on Energy and Commerce Advances 13 Bills to Unleash American Energy, H. COMM. ON ENERGY AND COMMERCE (Jun. 25, 2025), <https://energycommerce.house.gov/posts/full-committee-on-energy-and-commerce-advances-13-bills-to-unleash-american-energy-1>.

Letter to Administrator Lee Zeldin

November 5, 2025

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We appreciate your prompt attention to this matter. If you have any questions regarding this request, please contact the Committee Majority staff at (202) 225-3641.

Sincerely,



Brett Guthrie
Chairman
Committee on Energy and Commerce



John Joyce, M.D.
Chairman
Subcommittee on Oversight and
Investigations



Gary Palmer
Chairman
Subcommittee on Environment