National Association of State Energy Officials Comments on
DOE Request for Information (RFI) DE-FOA-0003568: Energy Critical Materials Assessment

National Association of State Energy Officials (NASEO)
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The National Association of State Energy Officials (NASEO) represents the 56 governor-designated State and Territory Energy Offices across the nation. We appreciate the opportunity to provide input on the U.S. Department of Energy's (DOE) Request for Information (RFI) to inform the next Energy Critical Materials Assessment.[1] NASEO supports the states' efforts to advance practical energy policies and programs and energy-related economic development that delivers affordable energy from all energy sources, advances innovative energy technologies, and ensures energy system security, reliability, environmental quality, and resilience.

Reliable and secure critical materials supply chains, including advancing domestic production and processing, are vital to meeting state energy goals. States across the nation are considering the following questions and issues relating to critical materials:

- **What energy and economic opportunities may be available to develop critical material resources and supply chains?**
  -Conventional and innovative resources; mining, extraction, processing, reuse, and recycling.
  -Potential remediation of brownfields and revitalization of mining and industrial sites, with associated employment and income opportunities.
- **How will critical material supply chain reliability or uncertainties affect the production of energy-related products and technologies?**
  -Supply and price trends and vulnerabilities for manufacturing of energy production, processing, transmission, and end-use products and technologies (e.g., permanent magnets for motors and generators, alloys for turbines, batteries, nuclear power components)
  -Attention to supply chain policies and to technological change, including opportunities for new technologies, alternatives, and substitute materials.
- **How will critical material availability, price, and supply chains affect energy infrastructure modernization, energy-related product innovations, and energy system security?**
  -Potential effects on the availability and cost of critical material-containing products to modernize and strengthen the electrical and broader energy systems, including needs for reliable and affordable growth in electrical generation and delivery and fuel supplies.

A few examples illustrate how states are working to advance their critical materials opportunities: **Alaska** has created a Critical Minerals Collaborative at the University of Alaska Fairbanks to advance research with industry, government, and academic partners.[2] The **Utah**

[1] Our comments can be considered to fit under RFI Category 8: Other.
[2] Alaska Critical Minerals Collaborative, https://acmc.alaska.edu/

legislature passed a Joint Resolution to advance critical minerals production, including streamlining permitting, encouraging public-private partnerships, and other supportive measures.[3] The **West Virginia** Water Research Institute operates a pilot facility to recover rare earth elements from acid mine drainage.[4] **Indiana**, among other states, is also examining recovery of critical materials from coal-associated materials and sites.[5] **Michigan** allocated $5 million for RD&D to increase reuse and recycling of batteries and other critical materials.[6] The **Wyoming** Energy Authority was expanded in 2021 to include bond funding for critical mineral and rare earth element production, and since 2023 has provided almost $17.6 million to three major rare earths projects in the state.[7] **Texas** is developing lithium and rare earth element mining and processing plants.[8] The **Missouri** Department of Natural Resources, with U.S. Geological Survey support, is exploring historic lead mining districts for cobalt and rare earth elements and the Missouri University of Science and Technology leads a Critical Minerals and Materials for Advanced Energy (CM2AE) consortium.[9], [10]

To help State Energy Offices in this area, with DOE Office of Fossil Energy support, NASEO published Critical Energy-Related Minerals: Considerations for State Energy Planning, Policy, and Programs, created a Critical Minerals resources site, and has shared state energy policy and planning actions to inform decision making. NASEO is developing a Critical Minerals working group of State Energy Offices and private-sector partners focused on helping develop critical materials production and processing policies, planning, and actions to expand U.S. production. NASEO is also facilitating discussions with State Energy Offices and critical minerals experts at NASEO's regional meetings and other events, and identifying opportunities for continued state-federal-private sector coordination and collaboration. We welcome continued opportunities to work with DOE to advance this topic with the states and support state-federal cooperation.

NASEO supports the Department's Critical Minerals and Materials Program and its intent to develop a Critical Materials Assessment to help make the United States a leading producer and

[3] Utah State Legislature, S.J.R. 11: Joint Resolution Regarding Critical Minerals, https://le.utah.gov/~2025/bills/static/SJR011.html
[4] West Virginia Water Research Institute, Rare Earth Recovery https://wvwri.wvu.edu/divisions/critical-materials/rare-earth-recovery
[5] M. Mastalerz, et al. (2022), "Coal and Coal Byproducts as Potential Sources of Rare Earth Elements (REE) in Indiana," *Indiana Journal of Earth Science*, (Vol 4), https://scholarworks.iu.edu/journals/index.php/IJES/article/view/35307
[6] Michigan Department of Environment, Great Lakes, and Energy, https://www.michigan.gov/egle/newsroom/press-releases/2024/10/09/critical-minerals-grants
[7] State of Wyoming Legislature, (2021), S0043 – Wyoming energy authority amendments, https://www.wyoleg.gov/Legislation/2021/SF0043
[8] Texas Comptroller of Public Accounts, Fiscal Notes, "Rare Earth Elements: Texas Rare Earths Show Economic Potential for the State" (2021) https://comptroller.texas.gov/economy/fiscal-notes/archive/2021/nov/elements.php
[9] Missouri Department of Natural Resources (2024), Missouri Geological Survey receives funding to hunt for critical minerals, https://dnr.mo.gov/communications/news/missouri-geological-survey-receives-funding-hunt-critical-minerals
[10] Missouri University of Science and Technology, Critical Minerals and Materials for Advanced Energy Tech Hub, https://criticalminerals.mst.edu/techhub/

processor of critical minerals and materials, consistent with the President's directive in Executive Order 14154 *Unleashing American Energy*.

NASEO appreciates this opportunity to respond to the important RFI. We hope this is useful to DOE, welcome additional discussion, and are grateful for our partnership with the Department to support state energy priorities.