



July 20, 2026

SUBMITTED ELECTRONICALLY

Scott Turner
Secretary
U.S. Department of Housing and Urban Development
451 Seventh Street, SW, Washington, DC 20410

**RE: RFI Regarding Products and Categories of Products Used in Housing Programs
Pursuant to the Build America, Buy America Act (Docket No. FR-6616-N-01)**

Dear Secretary Turner:

The Solar Energy Manufacturers for America (SEMA) Coalition appreciates the opportunity to comment on the U.S. Department of Housing and Urban Development's (HUD) Request for Information regarding the availability of domestically manufactured products used in HUD-assisted housing programs pursuant to the Build America, Buy America Act (BABA). As detailed in the following comments, the SEMA Coalition is encouraged that HUD is evaluating the domestic availability of solar panels and other manufactured products as it continues implementing BABA across its housing and infrastructure programs.

The U.S. solar manufacturing industry has undergone unprecedented growth over the past several years, with billions of dollars in private investment supporting new factories producing solar modules, cells, wafers, inverters, polysilicon, and other critical components throughout the domestic supply chain. Today, American manufacturers possess substantial and growing capacity to supply BABA-compliant solar products for HUD-assisted housing and infrastructure projects. Continued implementation of strong domestic procurement requirements will reinforce these investments, strengthen supply chain resilience, create high-quality manufacturing jobs, and reduce dependence on foreign suppliers for critical energy technologies.

The [SEMA Coalition](#) is a diverse group of solar manufacturers united to rebuild the domestic solar supply chain. We represent the interests of the major non-Chinese solar manufacturers who are building or looking to build strategic solar components across the value chain in the United States. Our coalition advocates for policies that strengthen domestic manufacturing, enhance American energy security, and ensure the United States remains globally competitive in energy manufacturing.

We respectfully submit the enclosed comments in response to Docket No. FR-6616-N-01 and welcome the opportunity to continue engaging with HUD. For follow-up, please contact dylan@semacoalition.org.

Sincerely,

Mike Carr
Executive Director
SEMA Coalition

Domestic Production of Solar Modules and Cells

The United States has undergone a remarkable expansion in domestic solar manufacturing over the past several years. SEMA Coalition members support over 14,500 high-quality jobs across the country (Figure 1) and over 50,000 jobs in the solar manufacturing supply chain. Multiple SEMA Coalition members will open billion-dollar facilities in the next year to strengthen American energy dominance and onshore energy manufacturing. SEMA Coalition members also lead the world in commercially viable next-generation solar technologies that will allow the U.S. to compete with China's supply chain on price without long-term government subsidies.

Figure 1: SEMA Coalition, Manufacturing Supply Chain Supports Manufacturing Jobs Across the U.S

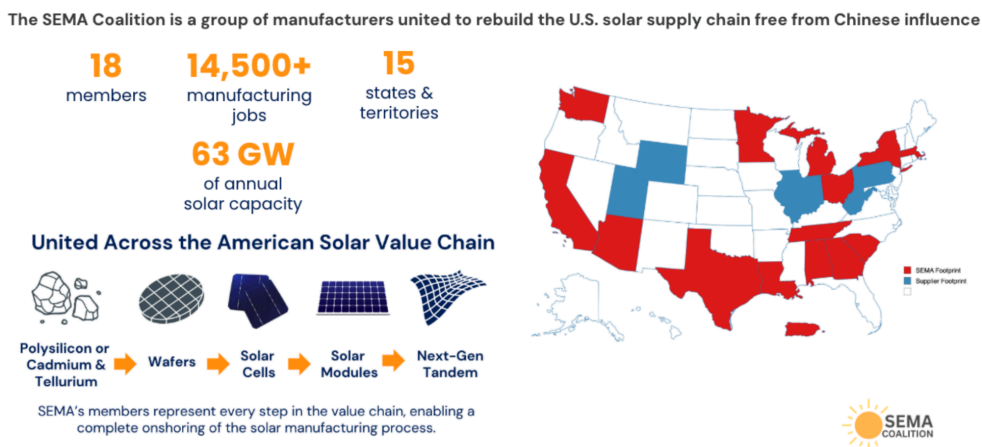
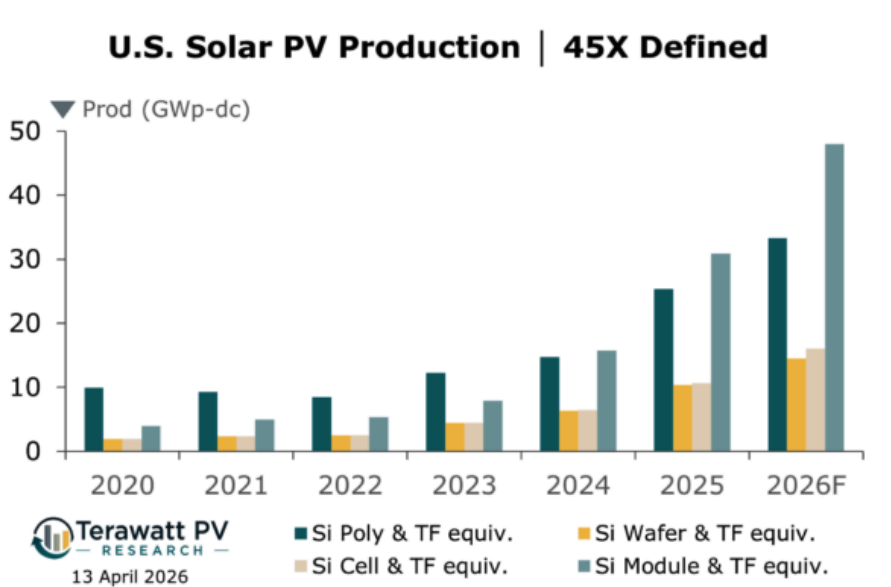


Figure 2: PV Magazine, Domestic Manufacturing by Solar Segment¹

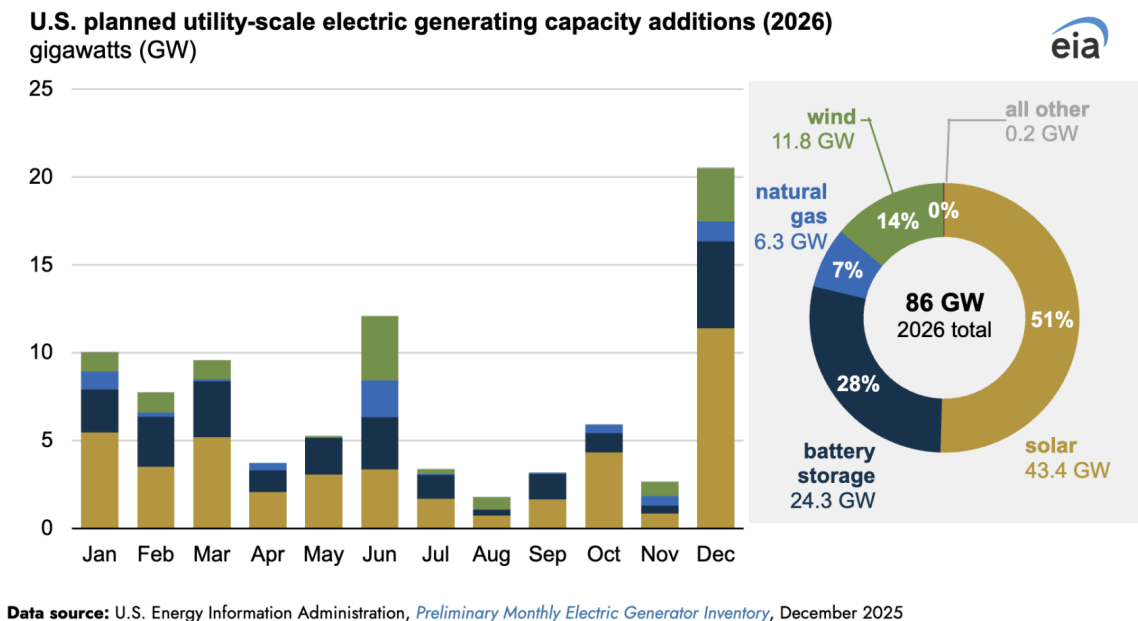


¹ Note: TF equiv. Is "thin film equivalent" – May undercount First Solar's vertically integrated Cadmium Telluride production in 2026

Today, SEMA Coalition member companies manufacture solar modules in Alabama, California, Georgia, Louisiana, Minnesota, Ohio, Texas, Washington, and Puerto Rico. Companies including First Solar, Heliene, Mission Solar Energy, Qcells, Solx, and Silfab Solar produce American-made solar modules serving residential, commercial, utility-scale, and public-sector markets. Together, these facilities represent a geographically diverse domestic manufacturing base capable of supplying HUD-assisted housing and infrastructure projects with American-made products.

SEMA Coalition members are projected to produce approximately 35 GW of solar module capacity this year. For context, that level of production is sufficient to supply nearly 81 percent of the 43.4 GW of utility-scale solar capacity that the U.S. Energy Information Administration [estimates](#) developers plan to add to the grid in 2026 (Figure 2), illustrating the scale of today's domestic manufacturing base. SEMA Coalition cell production this year will be about 18 GW, consistent with projections from Terrawatt PV (Figure 2), though additional domestic cell capacity exists. Given BABA's 55 percent domestic construction requirement for solar modules, U.S.-made cells in U.S. made modules are needed to hit BABA thresholds. This means that SEMA members alone have the capacity to produce 18 GW or more of BABA-compliant solar modules this year. SEMA Coalition member EPC Power can produce 40 GW of domestic inverter capacity annually. These inverters can be used in energy storage, data center and utility-scale solar facilities.

Figure 2: [EIA, January 2026 Short-Term Energy Outlook](#)



SEMA Coalition members are making historic investments across the upstream solar supply chain. Companies including Qcells, First Solar, Suniva, and Talon PV are producing, building, or investing in domestic solar cell manufacturing, while other coalition members continue expanding U.S. production of polysilicon, wafers, inverters, and next-generation photovoltaic

technologies. These investments are rebuilding critical segments of the solar supply chain that previously migrated overseas and reducing America's dependence on imports from China and other foreign adversaries.

As highlighted in [previous](#) SEMA Coalition comment letters, major utilities, energy developers, and AI companies have emphasized the need to deploy additional electricity generation as quickly as possible to meet rapidly growing demand. President Trump has likewise made clear that expanding affordable, reliable energy is essential to America's long-term economic competitiveness and national security. A strong domestic solar manufacturing base is therefore critical not only to securing resilient supply chains, but also to ensuring the United States can deploy the low-cost electricity needed to support economic growth.

Recommendations

The domestic solar manufacturing base has expanded significantly and continues to grow, with recently announced facilities increasing production and new factories beginning commercial operations. At the same time, investments in domestic solar cell and inverter production are strengthening manufacturers' ability to produce products with greater domestic content and increasing the availability of BABA-compliant solar products.

HUD should recognize that significant BABA-compliant domestically manufactured solar modules and inverters are commercially available today and that domestic solar cell production is expanding rapidly. Some stakeholders may contend that domestic sourcing requirements could increase project costs. However, as domestic manufacturing capacity has scaled, American-made solar products have become increasingly cost-competitive. Consistent, predictable demand drivers are precisely what enable manufacturers to achieve production volumes that further reduce costs. Waivers would invert this dynamic and suppress a critical demand signal that justifies continued investment.

As a result, the Department can confidently implement Build America, Buy America requirements for solar products without waivers while supporting the Administration's broader goals of strengthening American manufacturing and reducing dependence on foreign adversaries.

Providing clear, predictable implementation of BABA requirements will continue to encourage investment across the full domestic solar supply chain, not simply module assembly, and further strengthen America's long-term manufacturing competitiveness. This approach is consistent with the SEMA Coalition's previous recommendation that BABA implementation recognize and encourage investment throughout the domestic solar value chain. HUD should also continue engaging directly with domestic manufacturers as production capacity expands. The solar manufacturing industry is evolving rapidly, and regular engagement with manufacturers will help ensure HUD has the most current information regarding domestic availability, manufacturing capacity, and lead times as it administers Build America, Buy America requirements.

The SEMA Coalition appreciates HUD's efforts to evaluate domestic manufacturing capacity and stands ready to serve as a resource as the Department continues implementing Build America, Buy America. Strong implementation of these requirements will help ensure that

taxpayer-funded housing investments support American workers, strengthen domestic manufacturing, reduce reliance on foreign adversaries, and advance the Administration's America First manufacturing agenda.