

March 25, 2024

Jennifer Granholm
U.S. Secretary of Energy
U.S. Department of Energy
1000 Independence Ave., SW
Washington, DC 20585
United States
By email: The.Secretary@hq.doe.gov

Martin Keller
President
National Renewable Energy Laboratory
901 D St SW #930
Washington, DC 20024
United States
By email: martin.keller@nrel.gov
Cc: julie.baker@nrel.gov; meyer.seligman@nrel.gov

Re: National Renewable Energy Laboratory and Sharif University of Technology

Dear Secretary Granholm and Dr. Keller:

On behalf of United Against Nuclear Iran (“UANI”¹), I am writing to seek your clarification on the policy of the U.S. Department of Energy’s National Renewable Energy Laboratory (“NREL”) with respect to Iran and in particular, NREL’s ties to Sharif University of Technology (“SUT”). The U.S. Department of the Treasury has sanctioned several divisions and individuals within SUT pursuant to counterproliferation authorities, while SUT is also sanctioned by the EU and the UK, for involvement in the development of Weapons of Mass Destruction (“WMD”).²

National Renewable Energy Laboratory and SUT

On February 23, 2024, the Institute of Electrical and Electronic Engineers (“IEEE”) published an article titled, “Grid-Forming Inverter-Based Resource Research Landscape:

¹ UANI is a not-for-profit, bi-partisan, advocacy group that seeks to prevent Iran from fulfilling its ambition to obtain nuclear weapons. UANI was founded in 2008 by Ambassador Mark D. Wallace, the late Ambassador Richard Holbrooke, and Middle East expert Dennis Ross. UANI’s private sanctions campaigns and state and federal legislative initiatives focus on ending the economic and financial support of the Iranian regime by corporations until Iran verifiably abandons its drive for nuclear weapons, support for terrorism and gross human rights violations. Former U.S. Senator Joseph Lieberman is UANI’s Chairman. UANI’s Advisory Board consists of distinguished leaders in government, academia and business. See www.unitedagainstnucleariran.com/about/leadership.

² Wisconsin Project on Nuclear Arms Control, “[Sharif University of Technology](#),” updated February 14, 2023.

Understanding the Key Assets for Renewable-Rich Power Systems,”³ co-authored by seven researchers, including one from NREL⁴ and one from SUT.⁵ IEEE also notes that the research was grant-funded by the U.S. Department of Energy’s Solar Energy Technologies Office (“SETO”).

Grid-Forming Inverter-Based Resource Research Landscape: Understanding the Key Assets for Renewable-Rich Power Systems

Publisher: IEEE [Cite This](#) [PDF](#)

Behrooz Bahrani ; [Mohammad Hasan Ravanji](#) ; Benjamin Kroposki ; Deepak Ramasubramanian ; Xavier Guillaud ; Thibault Prevos... [All Authors](#)

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Sharif University of Technology, Tehran, Iran

(IEEE)


Sharif University of Technology

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Mohammad Hasan Ravanji

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(Sharif University of Technology)

³ IEEE, “[Grid-Forming Inverter-Based Resource Research Landscape: Understanding the Key Assets for Renewable-Rich Power Systems](#),” February 23, 2024.

⁴ NREL, “[Ben Kroposki](#)”

⁵ SUT, “[Mohammad Hasan Ravanji](#),”

Grid-Forming Inverter-Based Resource Research Landscape: Understanding the Key Assets for Renewable-Rich Power Systems

Publisher: IEEE [Cite This](#) [PDF](#)

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Power Systems Engineering Center at the National Renewable Energy Laboratory, Golden, CO, USA

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Ben Kroposki
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Ben Kroposki is the director of the Power Systems Engineering Center at NREL where he leads NREL's strategic research in the design, planning, and operations of electrical power systems. As center director, he manages

(NREL)

SUT, Sanctions, and WMD Proliferation

As noted, SUT (a.k.a. Arya-mehr University of Technology a.k.a. Sharif Technical University) is a sanction-designated Iranian institution. SUT and several SUT research units, departments, and affiliated individuals are variously sanctioned by the United States, Canada, the European Union, and the United Kingdom for supporting entities involved in Iran's military and in production and procurement for Iran's ballistic missile program proliferation of weapons of mass destruction.

U.S. authorities have designated various SUT divisions and individuals. SUT oversees the Advanced Information and Communication Technology Center ("AICTC"), Digital Media Lab

(“DML”), and the Mobile Value-Added Services Laboratory (“VASL”). All three entities were sanctioned by the United States Department of the Treasury, Office of Foreign Assets Control (“OFAC”), as Specially Designated Nationals (SDN) in 2012, pursuant to Executive Order (EO) 13382 which targets WMD proliferators.⁶ AICTC, DML and VASL are all additionally subject to “secondary sanctions,” which target not only the sanctioned entity itself but any third-party actors doing business with the sanctioned entity.

The screenshot shows the OFAC Sanctions List Search interface. At the top, it features the OFAC logo and the title "Sanctions List Search". Below this is a detailed explanation of the search tool's purpose and usage. The search results are displayed in a structured format:

Details:

Type:	Entity	List:	SDN
Entity Name:	ADVANCED INFORMATION AND COMMUNICATION TECHNOLOGY CENTER	Program:	NPWMD; IFSR
Remarks:			

Identifications:

Type	ID#	Country	Issue Date	Expire Date
Website	www.aictc.ir			
Additional Sanctions Information -	Subject to Secondary Sanctions			

Aliases:

Type	Category	Name
a.k.a.	strong	AICTC

Addresses:

Address	City	State/Province	Postal Code	Country
No. 5, Golestan Alley Shahid Ghasemi St. Sharif University of Technology	Tehran			Iran

(OFAC, Sanctions Search [AICTC, Sharif University of Technology])

According to the official SUT website and OFAC, the SUT Associate Professor at the Department of Computer Engineering is Rasool Jalili.⁷ Jalili was individually sanctioned by OFAC and is also

⁶ OFAC, “[Non-proliferation Designations](#),” July 12, 2012, and See Appendix.

⁷ SUT, “[Dr. Rasool Jalili](#)”

subject to secondary sanctions.⁸ According to the U.S. Department of the Treasury, Office of Public Affairs:⁹

As of February 2009, Rasool Jalili was attempting to acquire equipment related to monitoring of SMS traffic from abroad and as of early July 2012, Rasool Jalili was actively assisting the Government of Iran's internet censorship activities and was involved in blocking Iranian citizens' internet access to Facebook, ebay, and YouTube, in addition to other sites. Rasool Jalili also assisted in blocking any website that contained content criticizing the Iranian Government such as independent and international newspapers, blogs, and activist sites. In addition, Rasool Jalili's company, AmnAfzar, provided internet censorship and filtering software to the Government of Iran. On March 7, 2012, Rasool Jalili was appointed by the Supreme Leader of Iran as a member of Iran's Supreme Council of Virtual Space (AKA Supreme Council of Cyberspace). The Council is charged with establishing a center of national cyberspace to define policy and coordinate and make decisions regarding cyberspace.

In addition to U.S. Government sanctions, SUT is also specifically placed on the "Restricted Universities List" of some U.S. universities.¹⁰ In February 2019, various Iranian media reports quoted Iranian Minister of Science Research and Technology Mansour Gholami who reportedly stated, "Due to their nuclear research, Shahid Beheshti University and Sharif University of Technology were included in the [U.S.] sanctions list."¹¹

The European Union has also imposed sanctions on SUT "in relation to the non-proliferation of weapons of mass destruction."¹² On July 31, 2021, the EU designated SUT for having "a number of cooperation agreements with Iranian Government organisations which are designated by the UN and/or the EU and which operate in military or military-related fields, particularly in the field of ballistic missile production and procurement."¹³

SUT was originally listed by the European Council in 2011 for nuclear proliferation activities: "Sharif University of Technology (SUT) is assisting designated entities to violate the provisions of UN and EU sanctions on Iran and is providing support to Iran's proliferation sensitive nuclear activities. As of late 2011 SUT had provided laboratories for use by UN-designated Iranian nuclear entity Kalaye Electric Company (KEC) and EU-designated Iran Centrifuge Technology

⁸ OFAC Sanctions Search, "[Rasool JALILI](#)"

⁹ U.S. Treasury Department, Office of Public Affairs, "[FACT SHEET: SANCTIONS ON IRANIAN GOVERNMENT AND AFFILIATES](#)," 11/8/2012.

¹⁰ Columbia University, "[Sanctions & Export Controls: Identifying The Risks](#)," 4/18/2018.

¹¹ University World News, "[US adds two Iranian universities to sanctions list](#)," 2/22/2019; PersiaDigest, "[Two Iranian universities are sanctioned](#)," 2/18/2019; the accuracy of these reports is unconfirmed.

¹² EU Sanctions Map, "[Sharif University of Technology](#)"

¹³ EU Sanctions Tracker, "[Sharif University of Technology](#)"

Company (TESA).”¹⁴ The Institute for Science and International Study (“ISIS”) has likewise detailed SUT’s extensive, illicit, and clandestine nuclear program procurement efforts:

In the early 1990s, the Physics Research Center engaged in an extensive procurement effort that included using Sharif University of Technology and other entities to assist in outfitting a nuclear program. In many cases, Sharif University appears to have been used as a front for purchases made by PHRC. Some goods could have gone to Sharif University, but the bulk of the procurements appear destined for the PHRC or its sponsors. Sharif University also housed significant relevant expertise on nuclear technology, and there may have been cooperation between Sharif University and PHRC on undeclared nuclear activities that went beyond procurement.¹⁵

On April 28, 2016, the General Court of the European Council upheld the original decision to designate SUT by dismissing SUT’s suit to have it removed from the list. This decision was upheld by the European Court of Justice in April 2017.¹⁶ The European Council reaffirmed in 2016 that SUT has provided support to Iran’s nuclear and ballistic missile programs, and has several “cooperation agreements with Iranian Government organisations which are designated by the UN and/or the EU and which operate in military or military-related fields, particularly in the field of ballistic missile production and procurement.”¹⁷ These agreements include:

an agreement with the EU-designated Aerospace Industries Organisation for inter alia the production of satellites; co-operating with the Iranian Ministry of Defence and the Iranian Revolutionary Guards Corps (IRGC)¹⁸ on smart boat competitions; a broader agreement with the IRGC Air Force which covers developing and strengthening the University’s relations, organisational and strategic cooperation; SUT is part of a 6-university agreement which supports the Government of Iran through defence-related research; and SUT teaches graduate courses in unmanned aerial vehicle (UAV) engineering which were designed by the Ministry of Science among others. Taken together, these show a significant record of engagement with the Government of Iran in military or military-related fields that constitutes support to the Government of Iran.¹⁹

¹⁴InfoCuria – Case Law of the Court of Justice, Council of the European Union, “[JUDGMENT OF THE GENERAL COURT \(Seventh Chamber\)](#),” 4/28/2016.

¹⁵ ISIS, “[The Physics Research Center and Iran’s Parallel Military Nuclear Program](#),” 2/23/2012.

¹⁶ European Sanctions “[Sharif University ECJ appeal rejected](#),” April 17, 2017.

¹⁷ InfoCuria – Case Law of the Court of Justice, Council of the European Union, “[JUDGMENT OF THE GENERAL COURT \(Seventh Chamber\)](#),” April 28, 2016.

¹⁸ The IRGC was designated as a Foreign Terrorist Organization (“FTO”) by the United States in 2019.

¹⁹ InfoCuria – Case Law of the Court of Justice, Council of the European Union, “[JUDGMENT OF THE GENERAL COURT \(Seventh Chamber\)](#),” April 28, 2016.

Sharif University of Technology

Sharif University of Technology (SUT) has a number of cooperation agreements with Iranian Government organisations which are designated by the UN and/or the EU and which operate in military or military-related fields, particularly in the field of ballistic missile production and procurement.

DESIGNATION DATE	REGIME	NATIONALITY
7/31/2021	<u>IRAN</u>	<u>UNKNOWN</u>
FINANCIAL SANCTION	<u>2021/1242 (OJ L272)</u>	

(EU Sanctions Tracker: Sharif University of Technology)

The United Kingdom, too, re-listed SUT on its “Consolidated List of Financial Sanctions Targets in the UK” on December 31, 2020.²⁰

119. Organisation Name: SHARIF UNIVERSITY OF TECHNOLOGY

a.k.a.: (1) Arya mehr University of Technology (2) Sharif Technical University (3) SHFT (4) SUT **Address:** (1) Azadi Ave, 11365 8639, Tehran, Iran.(2) Azadi Ave/Street, PO Box 11365 11155, Tehran, Iran.(3) P.O. Box 11155 9466, Tehran, Iran.(4) P.O. Box 11365 9161, Tehran, Iran.(5) P.O. Box 11365 9466, Tehran, Iran.(6) PO Box 11365 8639, Azadi St, Tehran, Iran.**Other Information:** (UK Sanctions List Ref):INU0042. (UK Statement of Reasons):Sharif University of Technology provides support for and is associated with designated entities involved in Iran’s nuclear proliferation activities. (Phone number):(1) +98 21 600 5419 (2) +98 21 6022727 (3) +98 21 6602 2721 (4) +98 21 66022727 (5) +98 21 6616 5201 (6) +98 21 6616 5202 (7) +98 21 918 8287 (8) +98 21 S5366 161 (Website):www.sharif.ac.ir, www.sharif.ir (Email address):Ghorbani@sharif.ir. info@sharif.ir. oisc@sharif.edu. vafai@sharif.edu (Type of entity):University **Listed on:** 24/12/2012 **UK Sanctions List Date Designated:** 31/12/2020 **Last Updated:** 04/03/2022 **Group ID:** 12816.

Office of Financial Sanctions Implementation HM Treasury, “[CONSOLIDATED LIST OF FINANCIAL SANCTIONS TARGETS IN the UK](#),” updated November 27, 2023.

²⁰ Office of Financial Sanctions Implementation HM Treasury, “[CONSOLIDATED LIST OF FINANCIAL SANCTIONS TARGETS IN THE UK](#),” updated June 14, 2022; Department for Business Innovation & Skills, UK, “[IRAN LIST](#),” 8/15/2012.

Conclusion

We welcome your explanation for NREL’s apparent cooperation with SUT, which works in highly sensitive regime-controlled sectors, is complicit in the development of WMD, and of which is subject to multiple sanctions designations from a range of authorities, including the U.S. We are sure that you agree that a national laboratory of the U.S. Department of Energy should not be cooperating with such entities or their researchers/employees—under any circumstances. We therefore trust that you share our concerns and we respectfully request that you conduct a thorough review into the foregoing. As a first step, please clarify the status of NREL’s ties to SUT, and confirm the suspension of all Iranian research/cooperation ties.

Thank you for your attention and we look forward to hearing from you.

Very truly yours,




Ambassador Mark D. Wallace

UANI is a not-for-profit, bi-partisan, advocacy group that seeks to prevent Iran from fulfilling its ambition to obtain nuclear weapons. UANI was founded in 2008 by Ambassador Mark D. Wallace, the late Ambassador Richard Holbrooke, and Middle East expert Dennis Ross. UANI's private sanctions campaigns and state and federal legislative initiatives focus on ending the economic and financial support of the Iranian regime by corporations until Iran verifiably abandons its drive for nuclear weapons, support for terrorism and gross human rights violations. Former U.S. Senator Joseph Lieberman is UANI's Chairman. UANI's Advisory Board consists of distinguished leaders in government, academia and business. See www.unitedagainstinucleariran.com/about/leadership.

APPENDIX

Additional Sanctions on SUT

№ з/п	Ідентифікаційні дані (повне найменування та реквізити юридичної особи)	Вид обмежувального заходу (відповідно до Закону України "Про санкції")	Строк застосування
77.	Шаріфський технологічний університет (Sharif University of Technology), Мисленізхаджація юридичної особи: Ісламська Республіка Іран, м. Тегеран (Tehran, Azadi Street, Sharif University of Technology, Iran).	товариств, підприємств, у яких резидент іноземної держави, іноземна держава, юридична особа, учасником якої є нерезидент або іноземна держава, володіє 10 і більше відсотками статутного капіталу або має вплив на управління юридичною особою чи її діяльність; 12) запровадження додаткових заходів у сфері екологічного, санітарного, фітосанітарного та ветеринарного контролю; 13) припинення дій торговельних угод, спільних проєктів та промислових програм у певних сферах, зокрема у сфері безпеки та оборони; 14) заборона передачі технологій, прав на об'єкти права інтелектуальної власності.	десять років
		1) блокування активів – тимчасове позбавлення права користуватися та розпоряджатися активами, що належать фізичній або юридичній особі, а також активами, щодо яких така особа може прямо чи опосередковано (через інших фізичних або юридичних осіб) вчиняти дії, тожожні за змістом здійсненню права розпорядження ними; 2) обмеження торговельних операцій (повне припинення); 3) обмеження, часткове чи повне припинення транзиту ресурсів, польовтів та перевезень територією України (повне припинення); 4) заборона виведення капіталу за межі України; 5) зупинення виконання економічних та фінансових зобов'язань; 6) анулювання або зупинення ліцензій та інших дозволів, одержання (навітьність) яких є умовою для здійснення певного виду діяльності, зокрема, анулювання чи зупинення дії спеціальних дозволів на користування надрами; 7) заборона участі у приватизації, оренді державного майна резидентами іноземної держави та особами, які прямо чи опосередковано контролюються резидентами іноземної держави або діють в їх інтересах; 8) заборона здійснення публічних та оборонних закупівель, товари, робіт і послуг у юридичних осіб – резидентів іноземної держави державної форми власності та юридичних осіб, частка статутного капіталу яких знаходиться	



O F A C

Office of Foreign Assets Control

Sanctions List Search

Specially Designated Nationals and Blocked Persons List ("SDN List") and all other sanctions lists administered by OFAC, including the Foreign Sanctions Evaders List, the Non-SDN Iran Sanctions Act List, the Sectoral Sanctions Identifications List, the List of Foreign Financial Institutions Subject to Correspondent Account or Payable-Through Account Sanctions and the Non-SDN Palestinian Legislative Council List. Given the number of lists that now reside in the Sanctions List Search tool, it is strongly recommended that users pay close attention to the program codes associated with each returned record. These program codes indicate how a true hit on a returned value should be treated. The Sanctions List Search tool uses approximate string matching to identify possible matches between word or character strings as entered into Sanctions List Search, and any name or name component as it appears on the SDN List and/or the various other sanctions lists. Sanctions List Search has a slider-bar that may be used to set a threshold (i.e., a confidence rating) for the closeness of any potential match returned as a result of a user's search. Sanctions List Search will detect certain misspellings or other incorrectly entered text, and will return near, or proximate, matches, based on the confidence rating set by the user via the slider-bar. OFAC does not provide recommendations with regard to the appropriateness of any specific confidence rating. Sanctions List Search is one tool offered to assist users in utilizing the SDN List and/or the various other sanctions lists; use of Sanctions List Search is not a substitute for undertaking appropriate due diligence. The use of Sanctions List Search does not limit any criminal or civil liability for any act undertaken as a result of, or in reliance on, such use.

[Download the SDN List](#)
[Sanctions List Search: Rules for use](#)
[Visit The OFAC Website](#)

[Download the Consolidated Non-SDN List](#)
[Program Code Key](#)

Details:

Type:	Entity	List:	SDN
Entity Name:	DIGITAL MEDIA LAB	Program:	NPWMD: IFSR
		Remarks:	

Identifications:

Type	ID#	Country	Issue Date	Expire Date
Additional Sanctions Information -	Subject to Secondary Sanctions			


Aliases:

Type	Category	Name
a.k.a.	strong	DML

Addresses:

Address	City	State/Province	Postal Code	Country
No. 5, Golestan Alley Ghasemi St. Sharif University of Technology	Tehran			Iran

OFAC: Sanctions Search [Digital Media Lab, Sharif University of Technology]



O F A C

Office of Foreign Assets Control

Sanctions List Search

Specially Designated Nationals and Blocked Persons List ("SDN List") and all other sanctions lists administered by OFAC, including the Foreign Sanctions Evaders List, the Non-SDN Iran Sanctions Act List, the Sectoral Sanctions Identifications List, the List of Foreign Financial Institutions Subject to Correspondent Account or Payable-Through Account Sanctions and the Non-SDN Palestinian Legislative Council List. Given the number of lists that now reside in the Sanctions List Search tool, it is strongly recommended that users pay close attention to the program codes associated with each returned record. These program codes indicate how a true hit on a returned value should be treated. The Sanctions List Search tool uses approximate string matching to identify possible matches between word or character strings as entered into Sanctions List Search, and any name or name component as it appears on the SDN List and/or the various other sanctions lists. Sanctions List Search has a slider-bar that may be used to set a threshold (i.e., a confidence rating) for the closeness of any potential match returned as a result of a user's search. Sanctions List Search will detect certain misspellings or other incorrectly entered text, and will return near, or proximate, matches, based on the confidence rating set by the user via the slider-bar. OFAC does not provide recommendations with regard to the appropriateness of any specific confidence rating. Sanctions List Search is one tool offered to assist users in utilizing the SDN List and/or the various other sanctions lists; use of Sanctions List Search is not a substitute for undertaking appropriate due diligence. The use of Sanctions List Search does not limit any criminal or civil liability for any act undertaken as a result of, or in reliance on, such use.

[Download the SDN List](#)
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[Visit The OFAC Website](#)

[Download the Consolidated Non-SDN List](#)
[Program Code Key](#)

Details:

Type:	Entity	List:	SDN
Entity Name:	MOBILE VALUE-ADDED SERVICES LABORATORY	Program:	IFSR, NPWMD
		Remarks:	

Identifications:

Type	ID#	Country	Issue Date	Expire Date
Website	www.vaslab.ir			
Additional Sanctions Information -	Subject to Secondary Sanctions			

Aliases:

Type	Category	Name
a.k.a.	strong	VALUE-ADDED SERVICES LABORATORY VASL

Addresses:

Address	City	State/Province	Postal Code	Country
5th Floor, Azadi St. Sharif University of Technology	Tehran			Iran

OFAC: Sanctions Search [Digital Media Lab, Sharif University of Technology]