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The Energy Coalition Comments - Tribal EBD Draft Guidelines (22-DECARB-03)

Additional submitted attachment is included below.



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Subject: The Energy Coalition Responses to Request for Information on the Tribal Equitable Building Decarbonization Direct Install Program (CEC Docket No. 22-DECARB-03)

Introduction

The Energy Coalition appreciates the opportunity to provide comments on the California Energy Commission's (CEC) draft guidelines for the Tribal Direct Install Program under the Equitable Building Decarbonization (EBD) initiative.

We commend the CEC for setting aside dedicated funding for tribes and tribal members. This Program has the potential to deliver transformational benefits by advancing energy equity, supporting tribal sovereignty, and ensuring California Native American communities are fully included in the state's decarbonization goals.

The Energy Coalition (TEC) is currently an implementing partner within the Southern California Regional Administrator team for the Statewide Direct Install EBD program. TEC also leads the Southern California Regional Energy Network (SoCalREN) Tribal Initiative.

Feedback

Program Implementer Selection - What qualifications or criteria are important to consider when selecting the program implementer?

The qualifications of the program implementer will be critical to the Program's success. We encourage the CEC to prioritize implementers with direct experience working with tribal communities, cultural competency, and a demonstrated understanding of tribal sovereignty. The implementer (or implementer team) must be capable of recruiting and training local and tribal contractors, not just larger market actors, to ensure that economic benefits remain in tribal communities. It is also important that the implementer be able to coordinate with other state, federal, and utility programs to leverage funding and avoid duplication. Finally, while one statewide implementer may be administratively efficient, we encourage CEC to consider whether a regional implementer model, or at minimum a statewide implementer working in partnership with tribal-serving organizations, would provide more equitable and responsive delivery (additional related recommendations are below).

Supporting Tribal Enrollment and Decision-Making

The choice between receiving a direct grant and opting for services through the Program implementer is an important one. To make an informed decision, tribes will need clear information about Program timelines and the period of performance. Tribes will also need clarity on how the administrative cost cap



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will function in both pathways. It should be made clear that the implementer's administrative costs will not reduce the funding available for projects or households served under the non-implementing pathway.

Encouraging broad tribal participation will require dedicated outreach and pre-application technical support. We suggest that the Program Implementer scope include these services (in addition to the services currently envisioned in the proposed guidelines). To facilitate this, we encourage the CEC to consider issuing the Program Implementer RFP in parallel with opening the program to tribal enrollment. A possible approach would be to allocate a pre-determined budget for the Program Implementer to support enrollment outreach as well as services to a pre-determined number of non-implementing tribes.

Additional Considerations

We support the provisions of this Program that recognize tribal sovereignty, and we believe that tribes should retain decision-making authority over which homes are served, which contractors are hired, and which retrofit measures are prioritized. The guidelines should also allow flexibility for tribes to propose alternative retrofit packages that reflect their unique housing stock, cultural preferences, and climate conditions.

We believe resilience should be a stronger focus. Many tribes face unreliable grid service, and the exclusion of solar PV and standalone battery storage from eligible measures risks leaving critical gaps. At minimum, the guidelines should explicitly enable coordination with solar and storage programs, and the CEC should consider including limited resilience measures within the Program itself.

Finally, data collection and reporting must respect tribal data sovereignty and privacy. Household-level data requirements may create concerns and administrative burdens for tribes. We urge CEC to provide options for aggregate reporting and simplified reporting pathways, particularly for tribes with limited staff capacity.

Thank you again for this opportunity to comment.

Sincerely,

Laurel Rothschild
Vice President
The Energy Coalition