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EPIC 5 Investment Plan Comments from the Tribal Energy & Climate Collaborative and Prosper Sustainably

California Energy Commission Leaders and Staff:

I am submitting the following comments in response to the EPIC 5 Investment Plan public workshop held on June 11, 2026, taken from comments I made during the workshop:

Comments Made During the Transportation Electrification Presentation

My name is Josh Simmons. I am co-director of the Tribal Energy and Climate Collaborative (TECC), which is serving the 26 member tribes of the Southern California Tribal Chairmen's Association (SCTCA).

I appreciate the opportunity to provide feedback. I want to emphasize that tribes have interest in advancing technologies and deployments of EV infrastructure, including vehicle-to-grid and vehicle-to-building. We want to see advancements in the EV technology itself, and the projects themselves also need to include distributed energy resources. With the increased electrification, that creates vulnerabilities in rural and tribal communities. DERs, such as energy storage with generation like solar, are needed for resiliency to mitigate the cost impacts and lead to cost savings. I think they are needed to mitigate the grid impacts itself, benefit the grid, and flatten the duck curve from the increasing strength of the grid from electrification.

And then for tribes, too, when they're deploying EV infrastructure, needing to do utility upgrades can take time and be costly. So having these things paired with distributed energy resources will decrease that need and make these projects more likely to be successful.

The Tribal Energy and Climate Collaborative has an innovation ecosystem under its economic and workforce development program that's seeking to advance emerging clean energy technologies, including those related to transportation electrification, through pilots and demonstration projects, tribal co-ventures, tribally led ventures, and workforce development and training initiatives. So, we'd like to see that there be carveouts in EPIC transportation electrification funding for tribes, and all funding that's out there, that there are carveouts for tribes. Ideally, there would be some transportation electrification capacity building and training available for tribal governments and communities.

My question is, how so far have tribes been incorporated into the programming and investments for this area for transportation electrification to date? I joined a little bit late

and I didn't see any mention of tribes.

Yeah, I mean I think the point is that certainly we want tribal-specific programming, but ideally all the programming has some element of opportunities for tribal participation and tribal benefits—mutual benefits to the state in advancing these technologies writ large. Simultaneously advancing technologies, we have tribes that I think have a unique opportunity to be in a position to help the advancement of these technologies and solutions on behalf of the state, and already are doing so through deployment of things like advanced microgrids, a lot of EV infrastructure being deployed, energy storage, so on and so forth. But I will be prepared to comment, provide some feedback, and ask questions in the next session.

Comments Made During the Leveraging DERs and Load Flexibility for Affordability and Grid Reliability Presentation

Josh Simmons, co-director of the Southern California Tribal Chairmen's Association's Tribal Energy and Climate Collaborative. So, just again, appreciate all the efforts here. I want to share that I believe tribes can be potential ideal communities for participation in the DER and load flexibility initiatives under EPIC. On reservations, there is often a collection of homes, buildings, and facilities that are really more of an integrated community than you would typically see outside of a reservation, where the members of the government themselves, the tribal council, and the general council are mostly those that live on the reservation itself and own and operate the businesses. So, I am really advocating for ensuring that opportunities for tribes to participate, access funding, and be in a position to advance these technologies and solutions should be prioritized. But there still should be some emphasis on capacity building and training for tribes.

I think this is a more general kind of consideration rather than a specific question right here: considering how the unique needs of tribes and unique opportunities that tribal communities present are being considered in the investment plan and in the programming.

And then, one additional question: has any consideration been given to transactive energy models and systems in this realm? I did not see it mentioned at all, and certainly, there's that type of opportunity. The success of something like that, particularly with the emergence of artificial intelligence, means transactive energy could go from potentially being something that's perhaps a little more challenging to more realistic. So, yeah, if you can share any thoughts on that. Thank you.

Accelerating Grid Connection of Clean Resources and Beneficial Loads Comments

Yeah, thanks again, Josh Simmons, the co-director of the Tribal Energy and Climate Collaborative. So, reiterating some points again in this context about tribes having unique needs and presenting unique opportunities to advance these technologies and solutions. With respect to rights of way, tribes have unique challenges, including the need for the Bureau of Indian Affairs to approve rights of way on tribal trust lands. I just

want to advocate for ensuring that all funding and programming has a tribal carveout and that there's capacity building and training for tribes related to advancing grid technologies.

I want to elaborate on something I mentioned before about the TECC innovation ecosystem, which is funded by the California Jobs First regional innovation regional investment initiative tribal fund grant, which is designed to incubate, accelerate, and advance pre-commercial technologies through tribally led pilots, demonstration projects, partnerships, and co-ventures. Our ecosystem partners include Cleantech San Diego, LACI, LARTA, UCSD, UCR, SDSU, and others that are promoting these advancing technologies at earlier stages, where I think our ecosystem is particularly positioned to help these pre-commercial technologies navigate the valley of death on the other side to early commercialization and full commercialization. I would advocate providing funding and programming for tribal-specific initiatives that can build upon and extend this existing infrastructure.

Coming back to an earlier point, in terms of the types of solutions being considered and the research being conducted, I think this should include non-wire solutions, including off-grid systems owned and operated by IOUs. I can't say that tribes are going to have varying perspectives on this, but there are plenty of tribal communities and rural communities that are so far from the nearest grid that they don't have access to power. It's just not feasible and cost-effective to run distribution or transmission miles to get to them. The communities that lack the resources to make these investments themselves could benefit from having access to utility-operated off-grid systems with the same rate base. Has the CEC considered this potential solution or approach?

I understand that the EPIC funding is dependent upon being an IOU customer, and so I think the model is, okay, well, there could be a costly upgrade of infrastructure to get to a community which increases rates versus there not being that costly infrastructure of transmission and distribution infrastructure to get there, and the off-grid system itself being operated as part of the grid without the wires connecting it.

I think that would be not only beneficial to the community that's otherwise lacking basic access to power which should just be a human right and affordable access to that power, while keeping the cost of the infrastructure investment down. That vulnerable infrastructure is likely not in place because it's going across hard, difficult terrain or forested lands that are vulnerable to starting wildfires. Ultimately, it is of benefit to the ratepayers and the grid at large to not be investing in that type of infrastructure if there is a viable alternatives.

Comments Made During the Community-Led Clean Energy Capacity Building and Research Incubation for California Native American Tribes and Community-Based Organizations Presentation

Thank you. Yeah, exciting to see this. I appreciate the consideration of this for California

tribes. I just want to make sure that in the tribal category, tribal consortia are also eligible as a means by which several tribes can work together and build out this programming.

In addition to the proposed training and capacity-building investments that were shared—which absolutely are along the lines of what I have been advocating for in all these areas and I think this kind of covers it—going back to the last topic too, I think there should also be funding for tribes themselves to have an accelerator/incubator program like Cleantech San Diego or LACI, focused specifically for tribes. That can put them in a position to not just build capacity and get training, but also help facilitate partnerships, pilots, demonstrations, and investments in these businesses that can capitalize on the unique opportunities, resources, and challenges that tribes present. I think tribes, potentially on a per capita basis, are deploying clean energy technologies and solutions at a greater rate than perhaps the rest of California through projects supported by CEC and EPIC funds.

And so, I think there's a mutually beneficial opportunity here both for tribes and for the state to advance these solutions and priorities in ways that are also going to help advance tribal energy self-sufficiency, economic investments, and workforce development. So, thank you.

Yeah. I guess it's hard to see what the program looks like itself, but the TECC innovation ecosystem is doing some of this right now already. SCTCA, the Southern California Tribal Chairmen's Association, is a 501(c)(3) whose board is made up of the 26 member tribes throughout Southern California. So there is some infrastructure in place that is funded through the state right now. It originally was funded with a National Science Foundation Regional Innovation Engines grant that got clawed back, and now funded by a California Jobs First Regional Investment Initiative grant, which focuses particularly on this. To be able to do this—providing training and capacity-building activities, but also facilitating pilots, demonstration projects, partnerships, and investments—would help TECC to build out and continue to maintain this complete ecosystem that is partnering with other organizations throughout the state, like the universities and the other non-tribal specific accelerator/incubators.

Thank you.

Comments Made During the Climate Adaptation Presentation

Thank you. Yeah. So, appreciate the CEC's past funding for tribal microgrid projects and efforts, and other funding and programming to increase tribal energy sovereignty and resiliency. Starting with the Blue Lake Rancheria's microgrid—I guess in terms of what I've seen under EPIC, we've not seen a whole lot of funding under EPIC for tribal microgrid deployments. Particularly with the federal government's changes to the investment tax credits impacting solar and renewable energy resources, the resources for these solutions are decreasing. There's the CPUC's microgrid incentive program, but that's only for in-front-of-the-meter systems that really are not a good fit for the majority of tribes and their situations. In-front-of-the-meter systems decrease tribal energy sovereignty versus the behind-the-

meter systems that tribes have greater control of and allow them to decrease their costs.

I'm sorry, this is Josh Simmons with the Tribal Energy and Climate Collaborative. I also have a firm called Prosper Sustainably that serves as owner's representative for probably a half-dozen tribes on tribal microgrid projects. These projects are still challenging. They're still very costly. The simpler ones are relatively easy, like a small solar plus storage system, but larger ones with control systems—there are limited tech controls, technologies, and solutions out there. You're kind of stuck with a few different vendors and you're operating at their whim. We've seen developers go out of business in this space as well. So I really want to encourage the CEC and the EPIC investment plan to include investment in advances in tribal energy microgrid technologies, solutions, and resiliency.

Ultimately, any of the funding in this area, just like others, should have carveouts. Funding, investments, and programming should have carveouts specifically for tribes and also support capacity building and training activities to help tribes build their capacity to be able to deploy these projects successfully.

Thank you for considering these comments.

Respectfully,

Josh Simmons
TECC Co-Director