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Comment Received From: Big Pine Paiute Tribe
Submitted On: 6/17/2019
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On Commissioner Workshop on Funding Opportunities

Additional submitted attachment is included below.



GENEVIEVE JONES
TRIBAL COUNCIL CHAIR

BIG PINE PAIUTE TRIBE OF THE OWENS VALLEY

Big Pine Paiute Indian Reservation

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June 12, 2019

To: The California Energy Commission

CC: Thomas Gates, Energy Commission Tribal Liaison

Christina Snider, Governor's Tribal Advisor

Electronic submission

Subject: Commissioner Workshop on Funding Opportunities and Improving Access to
Native American Tribes

Dear Honorable Energy Commissioners:

The Big Pine Paiute Tribe of the Owens Valley ("Tribe") is federally recognized with ancestral and Reservation lands in Inyo County. The Tribe appreciates the Energy Commission's attention to tribal perspectives and experiences as shared, for example, during the May 14, 2019, Workshop on Energy Commission Funding Opportunities and Improving Access to Native American Tribes. The purpose of this letter is to provide further input regarding ways in which the Energy Commission could better support tribal energy efforts.

Concerning the "Investment Portfolios and Energy Commission Funding Opportunities" described during the May 14th Workshop on Funding for Native American Tribes, the Tribe recommends the following:

- The California Electric Vehicle Infrastructure Program (CALeVIP) has the potential to greatly improve its benefit to tribal communities by reconsidering the geographic regions in which it is investing. While the Tribe understands that the geographic areas of CALeVIP are based on the EV Infrastructure Projection Tool established by the Energy Commission and NREL, it seems that offering incentives throughout more parts of California will be necessary to meet the goal of 250,000 EV chargers described in Executive Order B-48-18. The Tribe recommends the CALeVIP place more emphasis on arterial highways, rather than county boundaries. Expanding some incentives to rural but regularly used highways not only would benefit the state's emissions goals but also could provide economic opportunities for the towns along or accessed by these highways, including tribal communities. CALeVIP may also consider the possibility of working cooperatively with tribes in the implementation and hosting of EV chargers, as tribal lands are fairly spread throughout the state and could expand the reach of electric vehicles, including public transit.
- The Electric Program Investment Charge provides a great source of funding for IOU (Investor-Owned Utility) ratepayers, but unfortunately this excludes the Big Pine Paiute Tribe. The Big Pine Paiute Reservation is located in the service territory of the state's largest Publicly-Owned Utility (POU), the City of Los Angeles Department of Water and Power (LADWP). The Tribe is in the unfortunate predicament of receiving electric service from a POU with policy-makers

and regulators located within the City of Los Angeles, and these decision-makers are not accountable to citizens of the Reservation. The Tribe would encourage the Energy Commission to consider how other funding for implementation could be made available to tribes outside of IOU service territory.

Regarding utilities, the Tribe is concerned that the Energy Commission has failed to acknowledge the role POU's can play in hindering tribal energy development. The Energy Commission has recognized the need for improved relationships between IOUs and tribes, specifically in its state report on the California Tribal Energy Summit, but has not done the same with POU's. The Big Pine Paiute Tribe's Sustainable Energy Coordinator repeatedly cited issues with POU's in regard to solar implementation at the 2018 Tribal Energy Summit. While the Tribe understands that the jurisdictional reach of the Energy Commission and CPUC may not allow for regulatory oversight of POU's, acknowledging that POU's have an impact on the ability of tribes to develop energy sovereignty is important to support tribal energy efforts. At the very least, the Energy Commission should recognize that not all residents of California have a voice in regulations and policies imposed by POU's and should consider recommendations to bring equity to tribes and others in this situation.

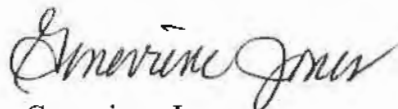
The Tribal Government Challenge Program is important in that it will focus state resources on understanding tribal energy issues and providing assistance to tribes. However, the Tribe is concerned that the Tribal Grant Program is currently limited to just planning activities in the energy sector. Some federal resources already exist for tribal energy planning such as the Department of Energy Technical Assistance Program, the Energy and Mineral Development Program and the Tribal Energy Development Capacity Grant through the Department of the Interior. In the experience of the Big Pine Paiute Tribe, funding for implementation of projects has been the biggest challenge in energy development. Concurrent with the Tribal Grant Program for planning, a Statewide Gap Analysis is to take place. The results of the Gap Analysis should reveal the need for access to implementation funds. The Tribe hopes that, in the near future, funding through the Tribal Government Challenge Program will not be limited to planning activities.

The Tribe is in support of the Energy Commission's efforts to include tribes when considering disadvantaged communities and hopes to see continued tribal representation in the Disadvantaged Communities Advisory Group.

The Tribe hopes to see more forums, such as the Workshop on Funding for Native American Tribes, in which the Energy Commission and tribes work together to understand how both tribal needs and state energy goals can be met.

Thank you for considering these comments. Should you have any questions or concerns, please contact the Tribe's Sustainable Energy Coordinator Emily Ontiveros (e.ontiveros@bigpinepaiute.org) or the Tribal Environmental Director Sally Manning (s.manning@bigpinepaiute.org), or by telephone at (760) 938-2003.

Sincerely,

A handwritten signature in cursive script, appearing to read "Genevieve Jones".

Genevieve Jones
Tribal Chairwoman