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DATE: November 30, 2022

TO: Department of Energy (dpaenergy@hq.doe.gov)

RE: Comments on the "Request for Information (RFI) on Defense Production Act"

INTRODUCTION

On behalf of the Greenlining Institute, 350.org, The Climate and Community Project, Kinetic Communities Consulting, and the Just Solutions Collective, we urge the DOE to adopt the recommendations set forth in this letter on the Request for Information on Defense Production Act ("DPA") to ensure racial, climate and economic equity are centered in the development of the program.

The Greenlining Institute ("Greenlining"), works toward a future where communities of color can build wealth, live in healthy places filled with economic opportunity, and are ready to meet the challenges posed by climate change. Greenlining greatly appreciates the opportunity to submit public comments on the DPA to the Department of Energy ("DOE"). We believe the DPA will be a crucial tool in building social, environmental, and economic resilience to the impacts of climate change in the nation's most frontline communities. Based on Greenlining's decades long experience providing input on the development and implementation of grant programs at the intersection of climate and economic equity, our work to build deep relationships with California neighborhoods and communities where the majority of residents are low-income and people of color, and our connections to local and national environmental justice groups, we offer the following guidance and context to support the development of the DPA funding program. Greenlining is joined by our partner organizations in sharing these recommendations.

Greenlining will send a complementary letter specific to the RFI to support electric heat pump manufacturing and deployment under the DPA. In addition to submitting letters in response to the DPA RFIs, we attended roundtable discussions around the implementation of the DPA. In an

effort to establish procedural equity¹ in the implementation of the DPA, we encourage greater communication and transparency into how the DOE will utilize stakeholder and public input in the design of DPA actions. For example, we sent a request to extend the RFI deadlines to ensure a comprehensive review and the DOE did not provide a response. Organizations require sufficient time to review materials, draft letters, and coordinate with partners; better communication with the DOE would have greatly helped streamline these processes and potentially allowed organizations with less capacity to weigh in. In addition, the RFI request states that “stakeholder input will inform DOE on the design of potential DPA actions” but does not elaborate on a timeline or whether they will provide details on how the feedback will be incorporated. Moving forwards, greater transparency in how the recommendations will be considered by the DOE will help build trust amongst environmental justice and equity focused organizations and create a table for a collaborative process on implementing the DPA.

Collectively, we firmly believe that equity must be an active, ongoing and evolving process in the DPA program to be successful in addressing injustices. We welcome the opportunity to work with the DOE to develop an equity centered DPA program that will benefit the most vulnerable members of our communities and align with the priorities of the Justice40 Initiative.

DETAILED RECOMMENDATIONS IN RESPONSE TO RFI QUESTIONS

9. *Program structure:* *Is there anything else that the government should be aware of as DOE designs potential implementation of DPA tools to support U.S manufacturers, developers, and installers?*

- The Center for Community Action and Environmental Justice, which works to bring people together through community organizing for social and environmental justice in the Imperial Valley of California, emphasized the importance of the DOE showing transparency, accountability, and commitment to advancing a just transition throughout the process, implementation, and evaluation of the DPA program.²
- In addition to the design of the grant program, the DOE could help ensure equity in the implementation of the DPA program by considering the demand side in addition to the supply side of deploying insulation and solar PV components. If the DOE has the authority to pre-purchase either of these technologies through advanced market commitments, DOE could pre-purchase insulation/solar components at a lower cost and deploy them in disadvantaged communities to ensure affordability and access.

¹Procedural Equity - Decision makers create inclusive and accessible processes for developing and implementing clean energy programs. Retrieved from: <https://www.aceee.org/topic/energy-equity>

² Center for Community Action and Environmental Justice. <https://www.ccae.org/requests-for-proposals>

16. **Workforce programs:** For the eligible technology areas covered in this RFI, what workforce training program(s) or partnerships (for instance, employer/community college/labor consortia, on-the-job training, private sector training providers, sector strategies) do you think will be useful for your technology(ies) of interest? What unions, worker groups, economic development centers, professional societies, community-based organizations, (post)secondary education facilities, and other stakeholders could be valuable partners in these training activities? Please fill out the chart below for technology(ies) for which you are providing input, and add rows as needed.

Supply chain activities	Labor skills need	Training programs/ partnerships to address need	Key Partners
<i>Name the eligible technology supply chain activity (e.g., grain-oriented electrical steel production, solar PV cell fabrication)</i>	<i>List the labor skills needed</i>	<i>Identify training programs and type of partnerships needed to address these labor skills</i>	<i>Identify the key partners needed</i>
The DOE should include technical assistance on business skills to all parts manufacturers	Workers should receive marketing, outreach and business development training to ensure that manufacturers are equipped to effectively partner with contractors, utilities, and retail outlets who employ and serve residents of disadvantaged communities. The DOE should provide support and resources specifically for small, women, and BIPOC installers and contractors.	Economic development centers, professional societies, community-based organizations, community colleges, universities, state workforce training programs	Key partners will vary across regions; in addition to the national partners listed out below, the DOE should also partner with regional and local organizations to ensure equity in the process and diverse representation in the technical advisory committee.

Supply chain activities	Labor skills need	Training programs/ partnerships to address need	Key Partners
The DOE should support training for installers of all these technologies (i.e. electricians, PV installers) to build the installation pipeline.	Training (including pre-apprenticeship, certification, and union-affiliated programs) should provide technical skills as well as cultural competency and anti-bias education. This training should align with DOE efforts to hire from Disadvantaged Businesses and Disadvantaged Workers.	Professional societies, utility programs, HVAC training groups, community-based organizations, community colleges, universities, state workforce training programs	

Key Partners

- The DOE should partner with a variety of workforce development organizations to help build the workforce across different geographies and communities. We have provided an initial, non-comprehensive list of potential partners below to provide examples of the types of organizations that the DOE should consider partnering with:
 - Examples of international/national/multi-state organizations to partner with:
 - Solar Energy International³ - International nonprofit that provides solar and electrician training to communities
 - Emerald Cities Collaborative HVAC Contractor Academy⁴ - National nonprofit network of organizations working together and providing policy and workforce training programs to advance a sustainable environment while creating sustainable, just and inclusive economies with opportunities for all
 - Elevate⁵ - National nonprofit that provides workforce and business development opportunities to developing and diverse workforce

³ Solar Energy International. Retrieved from: <https://www.solarenergy.org/>

⁴ Emerald Cities Collaborative. E-Contractor Academy. Retrieved from: <https://emeraldcities.org/our-work/e-contractor-academy/>

⁵ Elevate Energy. Retrieved from: <https://www.elevatenp.org/>

- Community Action Partnerships⁶ - National nonprofit that provides direct services like health and safety upgrades and weatherization to communities
- Green City Force⁷ - Non-profit focused on training public housing residents into the clean energy workforce
- Examples of regional/local organizations to partner with:
 - Richmond BUILD⁸ - City of Richmond program that works with majority low income people of color and many who were formerly incarcerated
 - Rising Sun Center for Opportunity⁹ - Nonprofit working in the Bay Area region providing pre-apprenticeship and apprenticeship programs including Opportunity Build
 - Laney College¹⁰ - Community college with an Environmental Technologies Program providing degrees and certificate programs
 - ReWork the Bay¹¹ - Regional nonprofit that partners with funders and workforce leaders to promote education and collaboration in the Bay Area so that everyone has access to quality, empowered jobs
 - BayREN¹² - Regional energy network offering energy and building training to a variety of stakeholders including contractors, building managers, and city employees
 - Cypress Mandela¹³ - Community based organization that offers free 16 week pre-apprenticeship training
 - Construction Trades Workforce Initiative (CTWI)¹⁴ - Workforce development nonprofit that works to bridge the gap between organized labor and key stakeholders

17. Labor standards and project selection criteria: *What specific labor standards and project selection criteria should guide the federal government in deciding which manufacturing firms benefit from DPA actions? These could include worker wages and benefits, access to unions, training opportunities, labor-management training programs, health and safety committees, or recruitment programs. What kinds of programs or partnerships do you participate in (or would*

⁶ Community Action Partnerships. Retrieved from: <https://communityactionpartnership.com/>

⁷ Green City Force. Retrieved from: <https://greencityforce.org/>

⁸ Richmond California. RichmondBUILD Academy. Retrieved from:

<https://www.ci.richmond.ca.us/1243/RichmondBUILD>

⁹ Rising Sun Center for Opportunity. Retrieved from:

<https://risingsunopp.org/programs/opportunity-build/join-opportunity-build/>

¹⁰ Laney College. Environmental Control Technology. Retrieved from: <https://laney.edu/ect/>

¹¹ Rework the Bay. <https://reworkthebay.org/>

¹² Bay Area Regional Energy Network. <https://www.bayren.org/>

¹³ Free Training For High Paying Careers. Cypress Mandela. <https://www.cypressmandela.org/programs>

¹⁴ Construction Trades Workforce Initiative. <https://ctwi-btca.org/>

you recommend) to support worker recruitment and retention in regarding the technology areas covered in this RFI?

- We agree that the DOE should consider prevailing wages and benefits, access to unions, training opportunities, labor-management training programs, health and safety committees, or recruitment programs.
- Furthermore, the DOE should consider aligning prevailing wage and apprenticeship requirements with applicable tax credits, such as § 48C.
- Building on these suggestions, we recommend that DOE emphasize the role of partnerships in ensuring equity in developing the labor standards and project selection criteria. From our research on workforce development programs in California, we recommend that the DOE work with organizations adhere to these general principles:¹⁵
 - **1. Prioritize partnerships across programs:** Partnerships across programs, agencies and training providers have proven to improve employment outcomes for populations with higher barriers to employment than a single pipeline program itself.
 - **2. Follow the Multi Craft Core Curriculum (MC3):** MC3 curriculum is a comprehensive pre-apprenticeship training curriculum that rigorously prepares trainees for adaptability in jobs thus creating a pathway for success in the trades.
 - **3. Utilize Project Labor Agreements (“PLAs”) and Community Workforce Agreements (“CWAs”):** The DOE should encourage engaging with PLAs and CWAs (see Seattle example below) that promote quality jobs and family sustaining wages to ensure equity in implementation. The DOE should also consider incorporating training programs within PLAs to streamline resources.
 - **4. Orient toward broad occupational training:** Orienting toward earn-as-you-learn apprenticeship training for broad occupational skills provides a range of career opportunities as opposed to training for specific tasks related to clean energy.
 - **5. Prepare students for Union apprenticeships:** The DOE should provide training geared toward success in union apprenticeships that put them on a pathway to a career with family sustaining wages and benefits instead of providing project-by-project jobs without job security.
 - **6. Establish formal agreements with apprenticeship programs:** When agreements are created between apprenticeship programs and employers, the students benefit from the removal of certain entry cost barriers.

¹⁵ *Research Highlights: Bay Area Green Infrastructure Jobs for Populations with High Barriers to Employment.* The Greenlining Institute. <https://drive.google.com/file/d/1C3w15kj2sZ4ttZ1dJxL9SlzgWRFUuoGy/view>

- **7. Provide additional support to address multiple challenges:** Funding needs to be available to support additional challenges that workers with high barriers to employment face such as transportation, homelessness, racism, hunger etc.
- With these principles in mind, the DPA program should provide technical assistance to help manufacturers partner with cities on workforce development to stimulate local economies in the long term.
 - These partnerships can help create pipelines of local workers and help cities meet their climate action plans and economic development goals. There are several examples of cities in diverse political contexts that have implemented inclusive workforce measures at the local level. Here are some examples of inclusive city-led workforce development:
 - **Boston¹⁶**
 - The Mayor of Boston took action to promote economic development for minority and women-owned businesses with an executive order following a study of employment related disparities in the city.
 - To support the city's objectives, the Emerald Cities Collaborative created the Boston Contractor Academy which provides free contractor training to disadvantaged contractors to improve diversity and inclusion in the HVAC industry.
 - **Seattle¹⁷**
 - The city entered into a community workforce agreement (CWA) with the local trade alliance to ensure consistent working conditions for construction workers
 - The CWA created a Priority Hire program which required a percentage of the labor hours on city projects worth \$5 million or more be performed by workers from economically distressed neighborhoods.
 - The CWA also required that 15% of city construction labor hours must be performed by apprentices.
 - The DOE should consult these organizations and cities to develop partnerships that promote diversity, equity, and inclusion in contracting for DPA eligible technologies manufacturing and installation.

¹⁶ Cha, Mijin, Dr. J, Devlin, Aria, & Conroy, J. *Winning on Climate: Case Studies of Cities Centering Economic Inclusion*. https://emeraldcities.org/wp-content/uploads/2022/05/CET-Report_Final_2022-04-27-1.pdf

¹⁷ Inclusive Economics. (2021). High-Road Workforce Guide for City Climate Action. 64. https://www.usdn.org/uploads/cms/documents/workforce-guide_4.12.21_form.pdf

- In addition to partnerships with cities, we recommend that the DOE build partnerships with and consider frameworks and recommendations from organizations leading on high road jobs and climate. For example, the DOE should consider:
 - The BlueGreen Alliance’s Solidarity for Climate Action¹⁸ platform for guidance on high quality jobs in climate action. The platform calls for:
 - Increased union density as a pathway forward to quality jobs and a family-sustaining livelihood
 - Raising labor standards in the non-construction sectors, such as improved wages and benefits and prioritizing full-time work
 - Setting mandatory labor standards including PLAs, community benefit agreements, local hire, and respect for collective bargaining agreements
 - PolicyLink and Emerald Cities Collaborative’s guidance on Inclusive Procurement and Contracting.¹⁹ The guide calls for:
 - Strengthening the constituency for and advocacy efforts around minority-owned, women-owned, and disadvantaged businesses (“MWDBEs”)
 - Developing a community of practice with inclusive procurement policy toolkits by sector
 - Developing accountability and reporting mechanisms to monitor and improve MWDBE participation rates
 - The Urban Sustainability Directors Network has developed a toolkit that local governments can use for building decarbonization programs specifically that includes guidance on workforce development.²⁰
 - The Emerald Cities Collaborative provides recommendations on how to enhance diversity in building electrification and provides some lessons learned in San Francisco.²¹
- The DOE can ensure that manufacturing is integrated within a more holistic vision for equitable building decarbonization by incorporating lessons learned from these frameworks and case studies and consulting the groups that led these projects.

¹⁸ BlueGreen Alliance. Solidarity for Climate Action.

<https://www.bluegreenalliance.org/work-issue/solidarity-for-climate-action/>

¹⁹ Fairchild, Denise. Rose, Kalima, Tell, Brian. (2018). Inclusive Procurement and Contracting: Building a Field of Policy and Practice.

https://emeraldcities.org/wp-content/uploads/2021/06/Inclusive-procurement_02.21.18-002-1.pdf

²⁰ *Equity in Buildings* (2021). The Urban Sustainability Directors Network.

https://emeraldcities.org/wp-content/uploads/2021/09/usdn_equity_and_buildings_framework_-_june_2021.pdf

²¹ *The Building Electrification Equity Project*. (2020). The Emerald Cities Collaborative.

https://emeraldcities.org/wp-content/uploads/2021/09/usdn_equity_and_buildings_framework_-_june_2021.pdf

18. **High road jobs:** *How can the federal government ensure that the jobs supported by any DPA actions in these clean energy technology sectors offer good wages and benefits and access to unions?*

- The DOE should build from successes and lessons learned from California Workforce Development Board's High Road Training Partnership (H RTP) program²² across the areas of equity, climate resilience, and job quality in evaluating the DPA program. The H RTP model:
 - Builds collective power, offers a more inclusive definition of industry leadership, and places systemic issues at the forefront
 - Responds to change and shifts workforce development assessment to more qualitative measures
 - Can be further improved through communities of practice and alignment with the workforce development system
- In addition, the DOE should consult state agencies that have demonstrated strong contracting practices with MWDBEs and replicate best practices.
 - For example, the California High-Speed Rail Authority has commissioned work from 653 small businesses including 213 Certified Disadvantaged Business Enterprises including 155 small businesses in disadvantaged communities, resulting in over 6,000 construction jobs in the Central Valley of California.²³
- The DOE should look at manufacturing and workforce recommendations for related sectors such as in the transportation industry and apply best practices to DPA eligible technologies manufacturing. For example, a Greenlining and UCS report on electric vehicle workforce development and manufacturing has the following recommendations:²⁴
 - California's electric truck and bus manufacturers should support the development of formal training pathways for new workers from underserved communities so they can access employment in this emerging field
 - California's government agencies should invest in skill-development programs aimed at training jobseekers in underserved communities to fill the emerging employment needs in the heavy-duty EV industry

²² Gonzalez-Vasquez, Ana Luz, Magaly, N. Lopez. (2021). The High Road to Economic Prosperity. *UCLA Labor Center*. https://www.labor.ucla.edu/wp-content/uploads/2021/05/Eval-Report_The-High-Road_UCLA-Labor-Center_FINAL.pdf

²³ *The High-Speed Rail Project*. California High-Speed Rail Authority. <https://www.caclimateinvestments.ca.gov/hsr>

²⁴ Chandler, Sara, Espino, Joel, O'Dea, Jimmy. (2017). Delivering Opportunity: How Electric Buses and Trucks Can Create Jobs and Improve Public Health in California. <https://www.ucsusa.org/sites/default/files/attach/2016/10/UCS-Electric-Buses-Report.pdf>

20. Economic benefits: *How can DPA authority provide the greatest opportunity to create broad regional economic benefits including economic diversification, tax revenues, and economic cluster effects?*

In addition to manufacturing, the DOE should provide a streamlined resource on all federal government programs that will procure these technology components and materials and help create partnerships with state and local governments. These partnerships can enable unit cost reductions from bulk procurement and greater economies of scale. It is important that the DOE coordinate across all of its programs aimed towards greater adoption of these technologies to make sure that disadvantaged communities have access to affordable and reliable products and services. To achieve this goal of increased access for disadvantaged communities, the DOE should:

- Support professional development opportunities for workforce development and highlight opportunities within these manufacturing industries and provide education on distribution and installation as well.
- Streamline all federal, state, and local programs to reduce inefficiencies and promote more economic diversification, tax revenues, and economic cluster effects
- Provide connections and strategies for manufacturers to form partnerships with local contractors and service providers for other federal, state, regional, and local government programs
- Provide support to foster collaboration within the HVAC and electricians' industries across companies that work in mining, manufacturing, marketing, distribution, installation, repairs, and disposal

21. Re-using infrastructure: *How can DPA authority provide the greatest opportunity to reuse/leverage existing industrial infrastructure to support clean energy transition?*

- It is essential to have a community driven process to ensure that communities can avoid any new health and safety concerns, mitigate past harms, and realize the full benefits of new economic opportunities. The DOE should include communities in the process of identifying and mitigating any negative impacts from closing fossil fuel or other industrial facilities. Community preferences must be the first priority in the decision to leverage or reuse existing industrial infrastructure.
- If appropriate, the DOE should use DPA financial assistance authority to support companies in remediating and repurposing industrial sites to meet health and safety standards before manufacturing these technologies. NYSERDA's Just Transition Site Reuse Planning Program is one example of a program that is designed to provide communities with planning services to inform future decision making at the local level to help mitigate any negative impacts of pending or future fossil fuel power plant

closures.²⁵ NYSERDA provides technical assistance to communities on site evaluation, economic analysis, stakeholder input, alternative reuse plans, demolition and abatement, and public health impacts. They have follow-on funding available for communities and developers to consider pre-development environmental site access, detailed infrastructure assessment, and workforce development. The DOE should consider offering similar services for a wider range of potential industrial infrastructure that could be repurposed to produce the DPA eligible technologies through the financial assistance provision in DPA or connect awardees with other similar programs.

22. Regional clusters:*How can DPA authority support “regional clusters” for clean energy manufacturing in underserved communities and communities where the economy is currently highly dependent on fossil fuel production (such as coal communities) to transform their economy in the next 5 to 10 years? If possible, please include information explaining your answer.*

- The DOE should consult and collaborate with affected communities and follow the *Just Transition Alliance’s Just Transition Principles* (listed below):²⁶
 - 1. Workers, community residents, and Indigenous Peoples around the world have a fundamental human right to clean air, water, land, and food in their workplaces, homes and environment.
 - 2. There is no contradiction among simultaneously creating sustainable development, having a healthy economy and maintaining a clean and safe environment.
 - 3. Liberalization of environmental, health and labor laws and corporate globalization -- know no borders. Therefore, solutions call for local, regional, national, and global solidarity.
 - 4. The development of fair economic, trade, health and safety and environmental policies must include both the frontline workers and fenceline communities most affected by pollution, ecological damage, and economic restructuring.
 - 5. The costs of achieving sustainable development, a healthy economy and clean environment should not be borne by current or future victims of environmental and economic injustices and unfair free trade policies.
 - 6. Workers and community residents have the right to challenge any entity that commits economic and/or environmental injustices. These entities include

²⁵ *Just Transition Site Reuse Planning Program*. New York State Energy Research and Development Authority. <https://www.nyserda.ny.gov/All-Programs/Just-Transition-Site-Reuse-Planning-Program>

²⁶ *Just Transition Principles*. Climate Justice Alliance. <https://climatejusticealliance.org/just-transition/>

governments, the military, corporations, international bodies, and mechanisms for securing corporate accountability.

- We recommend that the DOE consult local and state governments and community based groups to learn from best practices on just transition for fossil fuel workers at the state and local levels.
 - For example, the California Workforce Development Board created a *Regional Workforce Strategies in Contra Costa Project* to ensure that communities and workers in Contra Costa County who are most impacted by the transition from fossil fuels to a clean economy are prepared for the future.²⁷ This was a collaborative partnership between non-profit organizations, state agencies, environmental justice groups, labor unions, research institutions, consultants, and state agencies.
 - Another example is the Edge Collaborative that is convening a wide variety of partners to advance climate justice, technological innovation, and high quality economic opportunities across the energy and environmental sector in Stockton.²⁸
 - The DOE should similarly convene a range of stakeholders and use community input to determine how to use DPA authority to spur local manufacturing in communities specifically impacted by fossil fuel plant closures and other disadvantaged communities more broadly.

23. *Impacts of clean energy technology manufacturing and deployment* How could securing the national supply chain and increasing manufacturing and deployment in these technology areas impact underserved, overburdened, and frontline communities (“disadvantaged communities”)?

a. What could be the positive impacts of manufacturing initiatives supported by DPA authority? (For example: jobs, community enrichment, research opportunities).

- Increased manufacturing of the DPA eligible technologies has many benefits including:
 - **[More economic opportunities]:** Domestic manufacturing of these technologies can lead to more high road jobs which can ensure that disadvantaged communities enjoy the economic benefits associated with the clean energy transition.
 - The clean energy workforce is growing quickly and continues to provide tremendous economic opportunity. The clean energy industry employed nearly six times as many workers compared to the number of employees

²⁷ *Regional Workforce Strategies in Contra Costa County*. California Workforce Development Board.
https://cwdb.ca.gov/wp-content/uploads/sites/43/2021/04/2021.HRTP_BGA_ACCESSIBLE.pdf?emrc=43e649

²⁸ *Climate & EJ: Building a future green economy that centers justice + jobs*. Edge Collaborative.
<https://edgecollaborative.org/climate>

who work in fossil fuel extraction and generation in 2021.²⁹ Furthermore, median hourly wages for clean energy jobs are almost 30% higher than the statewide median wage. However, only 8% of the clean energy workforce are Black, 16.5% are Latinx, and 27% are women.³⁰ If designed and implemented well, the DPA can ensure that disadvantaged communities and underrepresented groups are included from the start in the clean energy economy.

- One report estimates that \$30B–90B investment in transmission is needed to meet electrification needs by 2030 in the U.S. with an additional \$200B–600B needed from 2030 to 2050.³¹ Intentionally capturing these investments domestically can grow local and national economies and streamline electrification efforts around the country.
- **[Energy affordability]:** Both solar panels and better insulation can potentially reduce energy bills and fuel poverty.³² However, it's important to note that the adoption of these technologies has multiple barriers that make it difficult for low-income households to adopt, especially renters.
- **[Decarbonizing industries]:** Green hydrogen can be used to decarbonize otherwise hard-to-electrify industries like industrial feedstock and the maritime and aviation industries. However, definitions of clean hydrogen should be clarified³³ and the end use of the hydrogen produced should be regulated to maximize efficiency and ensure there are minimal emissions³⁴, particularly in fenceline fossil-fuel communities.
- **[Increase grid reliability]:** A domestic supply of transformers and grid components and solar components will support the reliability of the grid during

²⁹ America's Clean Energy Powerhouse in the Wake of Covid-19. E2.

<https://e2.org/reports/clean-jobs-california-2021/>

³⁰ Hsieh, E. *Climate Tech's Inclusion Problem*. Canary Media. <https://www.youtube.com/watch?v=xGHX0TtXvc0>

³¹ Weiss, Jurgen, Hagerty, J. Michael, Castaner, Maria. (2019). *The Coming Electrification of the North American Economy*. Retrieved from: <https://wiresgroup.com/wp-content/uploads/2020/05/2019-03-06-Brattle-Group-The-Coming-Electrification-of-the-NA-Economy.pdf>

³² Best, Rohan, Sinha, Kompal. (2021). *Fuel poverty policy: Go big or go home insulation*. Energy Economics, 97. <https://doi.org/10.1016/j.eneco.2021.105195>

³³ Gersen, Sara. (2022). Stakeholder Feedback on Clean Hydrogen Production Standard (CHPS) Draft Guidance. Retrieved from: https://earthjustice.org/sites/default/files/files/earthjustice-et-al_comments-on-chps-guidance.pdf

³⁴ Saadat, Sasan. (2021). *Reclaiming Hydrogen for a Renewable Future*. Retrieved from: https://earthjustice.org/sites/default/files/files/hydrogen_earthjustice_2021.pdf

electrification. As one study notes, “Being carbon neutral is only possible by upgrading the grid”.³⁵

- **[Community ownership]:** Government agencies have the opportunity to work in partnership with communities to increase community agency and ownership through increasing grid reliability, distribution of renewable energy, and retrofitting the building stock.

b. What could be the negative impacts of manufacturing initiatives supported by DPA authority, and how can DOE alleviate these negative impacts? (For example: pollution, potential exacerbation of existing harms to communities hosting these industries).

- Increased manufacturing could add more air pollution, potential economic displacement, and health and safety concerns for communities and workers.
- The DOE should ensure that potential negative impacts are researched, communicated, acknowledged, and addressed in the community engagement plan and Community Benefits Plan (“CBP”). Otherwise, we risk perpetuating industrial pollution and creating low road jobs.
 - The DOE should require companies to disclose any negative impacts publicly to enhance transparency and should support them in finding ways to mitigate some of these impacts. Companies should be trained on appropriate ways to solicit and incorporate community feedback in a respectful and non-extractive way.
 - For example, DOE should fund and support companies in creating a life cycle assessment analysis to reduce embodied carbon and criteria pollution during the supply chain of the DPA eligible technologies. They should consider the supply chain for materials such as steel, junction boxes, and electrolyzers and attempt to minimize negative health and environmental impacts. In addition to raw materials, the DOE should work with other programs to incentivize clean shipping where possible to reduce emissions associated with transportation and distribution.
 - Green hydrogen is a nascent technology with the potential to have significant emissions through its life cycle. In addition to considering the standards for production and use of clean hydrogen as mentioned above, the DOE should fund more research on effects of hydrogen emissions and leakage rates.³⁶ They should clearly communicate any risks and hazards to

³⁵ Morvaj, Boran, Evins, Ralph, Carmeliet, Jan. (2017). *Decarbonizing the electricity grid: The impact on urban energy systems, distribution grids and district heating potential*. Applied Energy, 191, 125-140. <https://doi.org/10.1016/j.apenergy.2017.01.058>

³⁶ Ocko, B. Illissa, Hamburg, P. Steven. (2022). *Climate consequence of hydrogen emissions*. Atmos. Chem. Phys., 22, 9349-9368. <https://doi.org/10.5194/acp-22-9349-2022>

communities before projects are sited and approved so they have the chance to have any potential concerns and harms mitigated proactively.

- DPA funding allocated to produce hydrogen could support ongoing emissions by allowing the production of blue hydrogen and green hydrogen with biogas as the fuel source. The DOE should consider a stronger definition, than that established under the Clean Hydrogen Production Standard, of what qualifies as clean hydrogen in projects under the DPA authority.

c. Are there any legal, policy, economic, or environmental barriers that would prevent disadvantaged communities from benefiting from DPA activities?

- Many MWDBEs do not have the startup capital and operational support to start a business in the heat pump manufacturing industry or to apply for grants or other financial assistance.
 - The DOE should consider providing technical assistance (available for all) to clarify the DPA application process and provide support for community members and small companies to apply for grants.
- Permitting is often a barrier for contractors and manufacturers. The DOE should provide support to clarify and streamline the permitting process and other regulatory or administrative processes to lower barriers of access to joining the heat pump industry.
- The DOE must make the process for outreach, selection, implementation, and evaluation as transparent as possible to make sure that communities know about funding and employment opportunities and have the training and support to succeed.
- The DOE should provide training and support to awardees on developing and implementing a CBP and on social equity topics such as supply chain diversity, internal Diversity, Equity, Inclusion, Accessibility (“DEIA”) practices, and equitable building decarbonization programs and policy.
 - It is essential that the DOE provides technical assistance to help companies who are selected for DPA to follow through on their equity goals. To make equity real, companies need to be selected carefully that demonstrate commitment to creating and implementing a CBP. The awardees need support from DOE after the grant is awarded to demonstrate progress towards achieving the provisions in a CBP and internal DEIA practices.
 - If companies do not follow through on their stated equity goals, this can damage trust with communities. Companies must be held accountable to

mitigating against poor labor practices, health and safety concerns, and environmental hazards in disadvantaged communities.

24. ***Project Selection Criteria:*** *What project selection criteria and qualifying requirement(s) should the government consider or embed in DPA funded projects to ensure the DPA funded projects benefits the American public, support underserved communities, and do not cause unintended harm to the environment or communities?*

We recommend that the DOE do the following to center equity in the selection criteria:

[Criteria Language] - Clearly define and align equity related criteria with DOE's Justice40 Implementation guidance.

- The DOE should clearly define “diversity, equity, inclusion, and accessibility” and “community benefits plan” and make these definitions clear in the solicitation announcement. This is important because applicants need to clearly understand that this is a core criteria of selection and not a “nice to have.”
 - Clearer definitions can lead to more specific applications. For example, Greenlining’s report on Building a Diverse, Equitable, and Inclusive Cleantech Industry provides some examples of definitions for diversity, equity, and inclusion within the cleantech industry that can be a reference for DOE.³⁷
 - These criteria should also be clearly aligned with DOE’s Justice40 requirements and benefits methodology, as well as the policy priorities identified by the Office of Economic Impact and Diversity. In particular, project applicants should be required to provide a Stakeholder Engagement Plan and other elements of a Justice40 implementation plan as outlined in DOE’s “General Guidance for Justice40 Implementation.”³⁸
- The DOE should clearly identify and communicate how the DPA initiative advances specific Justice40 policy priorities in the solicitation announcement. This is important because it will provide more guidance for applicants to understand what the Justice40 priorities are and how their project could advance them.

³⁷ Ayub, P., Mohnot, S. (2020). *Building a Diverse, Equitable and Inclusive Cleantech Industry*. The Greenlining Institute. <https://greenlining.org/wp-content/uploads/2021/04/R4-DEI-report.pdf>

³⁸ *Department of Energy General Guidance for Justice40 Implementation*. Department of Energy. <https://www.energy.gov/sites/default/files/2022-07/Final%20DOE%20Justice40%20General%20Guidance%20072522.pdf>

- The DOE should include outreach, incorporation of community feedback, and transparent, two-way communication with affected communities about possible risks and opportunities as part of the requirements of assessing a successful CBP. The company should outline any potential risks (industrial waste or pollution, economic displacement, safety hazards etc) and create plans to mitigate them with community input. The DOE's General Guidance for Justice40 Implementation provides examples and guidelines for conducting an effective community benefit plan.
- The DOE should explicitly include outreach and inclusion of communities impacted by fossil fuel facility closures. This is important because it can help enable the just transition to shift from a conceptual framework to a core part of the design of the DPA program from the very beginning.

[Scoring Criteria and DPA Program Design] - Specify how the criteria will advance equitable community investment and apply these principles into the design of the DPA program

The DOE should incorporate the *Greenlined Economy Guidebook's Six Standards for Equitable Community Investment* in its selection criteria for the DPA to advance proposals that:³⁹

1. Emphasize race-conscious solutions

- While the DOE cannot explicitly use race as a selection criteria, they should still acknowledge and mitigate racial biases in the DPA program. This is important because acknowledging racial inequities in the construction and energy industries is the first step in repairing past harms and providing future opportunities to communities of color.
- The DOE should conduct inclusive outreach to institutions and professional societies that serve communities of color (such as Historically Black Colleges and Universities and professional societies such as the Association for Blacks in Energy). The DOE should include historical context on racial and economic disparities in the energy industry and how the DPA is an opportunity to mitigate future harms and provide benefits to affected groups during informational sessions on the DPA.
- In the DPA selection process, the DOE should utilize anti-bias training for reviewers. Providing training can reduce unintended bias against groups that traditionally have received less federal funding because of the legacy of past discriminatory federal policies such as redlining.

● Prioritize multi-sector approaches

³⁹ Cooper, S., & Sanchez, A. (2020). *The Greenlined Economy Guidebook*. The Greenlining Institute. <https://greenlining.org/publications/2020/greenlined-economy/>

- The DOE should prioritize solutions that simultaneously advance multiple benefits (economic, health, social, and environmental) in disadvantaged communities.
- In the DPA selection process, the selection committee should provide a higher score to programs that have the potential to advance high road job creation in low-income communities while improving public health and environmental benefits than programs that only provide one of these projects.
- In addition to the selection process, the DOE should streamline communications with community members and other stakeholders by combining program outreach for DPA with other DOE programs that provide capital to companies manufacturing clean energy technologies such as programs offered through the DOE's Loans Programs Office,⁴⁰ the Office of Clean Energy Demonstrations (OECD) Regional Clean Hydrogen Hubs, or H2Hubs program⁴¹, other workforce development and educational grants⁴², and programs that provide direct benefits to disadvantaged communities such as the Weatherization Assistance Program.⁴³ This will enable communities and business owners to understand the wide range of opportunities for DOE funding to advance multiple benefits.
- Furthermore, the DOE should coordinate with other federal offices administering like
- Deliver intentional benefits
 - The DOE should avoid unintended consequences of direct investments in low-income communities of color by making sure that they are eligible to participate in the economic and environmental benefits of clean energy technology manufacturing and do not experience any negative environmental or economic impacts such as displacement.
 - In solicitation language, the DOE should include examples of negative social and environmental impacts that are common to many industrial manufacturing processes (potential displacement, increase in criteria air pollutants, etc.) to help prospective applicants respond directly to the ways that their companies will try to mitigate them. The DOE should consult the Transformative Climate

⁴⁰ *Department of Energy Loan Programs Office*. Department of Energy.
<https://www.energy.gov/lpo/loan-programs-office>

⁴¹ *Regional Clean Hydrogen Hubs*. Department of Energy.
<https://www.energy.gov/oced/regional-clean-hydrogen-hubs>

⁴² *STEM Rising Workforce Opportunities at Department of Energy*. Department of Energy.
<https://www.energy.gov/workforce>

⁴³ *How to Apply for Weatherization Assistance*. Department of Energy.
<https://www.energy.gov/eere/wap/how-apply-weatherization-assistance>

Communities guidance for Transformative Elements (Appendix C of the Program Guidelines)⁴⁴ as an example of language to help applicants identify and propose solutions to mitigate potential negative impacts of their projects. For example, Appendix C-2 provides guidelines on example policies to avoid the displacement of very low and low-income households from climate change mitigation projects.

- Build community capacity

- The DOE should ensure that under-resourced communities are able to apply for, develop and implement clean energy manufacturing programs. To achieve this, DOE must require and build in technical assistance, capacity building, and long term training and skills development.
- The DOE should conduct inclusive outreach and partner with regional networks, programs, state and local agencies, and intermediaries who have existing relationships and experiences building capacity. There are several programs across the country that are aimed towards building community capacity, especially for MWDBEs. For example, the Transformative Communities Program⁴⁵ is an example of a program that works closely with community based groups in California to develop long term capacity for communities to apply for and implement climate mitigation programs that also advance other community economic and health goals. The Regional Climate Collaborative is a grant that provides technical assistance for under-resourced communities in California to access funding and resources to plan and implement climate mitigation, adaptation, and resiliency programs.⁴⁶ The Massachusetts Supplier Diversity Office has several recommendations for capacity building, financial, and technical assistance for diverse and small businesses.⁴⁷ Several states have resources available for small businesses. For example the Governor's Office in Texas provides resources for Veteran, Minority & Women-Owned Businesses.⁴⁸

- Are community-driven at every stage

- Community-centered investment means lifting up community-led ideas and sharing decision-making power throughout every phase of a program's goal-setting, needs assessments, outreach, implementation and evaluation. DOE

⁴⁴ *Transformative Climate Communities Program Round 5 Draft Program Guidelines FY 2022-2023*, Strategic Growth Council. https://sgc.ca.gov/programs/tcc/docs/20221121-TCC_Round_5_Draft_Guidelines.pdf

⁴⁵ *Transformative Climate Communities*. Strategic Growth Council. <https://www.sgc.ca.gov/programs/tcc/>

⁴⁶ *Regional Climate Collaboratives*. Strategic Growth Council. <https://www.grants.ca.gov/grants/regional-climate-collaboratives-program/>

⁴⁷ *Capacity Building, Financial and Technical Assistance*. Massachusetts Supplier Diversity Office. <https://www.mass.gov/info-details/capacity-building-financial-and-technical-assistance>

⁴⁸ *Veteran, Minority & Women-Owned Business Resources*. Office of the Texas Governor. <https://gov.texas.gov/business/page/veteran-minority-women-resources>

funding should be in service of community identified goals and economic opportunities. DOE should give higher scores for companies that have a clear community-driven process.

- DOE funding should be in service of community identified goals and economic opportunities. DOE should give higher scores for companies that have a clear community-driven process as a part of the selection criteria.
 - The DOE can drive community-driven processes in the DPA program's design by setting an inclusive outreach strategy, including community members in the application review process, encouraging letters of support from trusted community partners in the application process, and aligning the implementation and evaluation process with Justice40 priorities. These technical advisory committee members must be compensated for their time and effort.
 - As part of the awardee selection process, the DOE should have a technical advisory committee that includes representatives from community based groups, community colleges, universities, apprenticeship and workforce training organizations, labor unions, tribal organizations, and MWDBEs. This is important to help provide diverse perspectives in scoring applications to ensure that the process is community-driven. This advisory committee will help score applications and inform the design of the solicitation. State and federal programs currently follow this approach. For example, the California Sustainable Energy Entrepreneur Development Initiative convenes an Equity Committee with representatives from MWDBEs, workforce development organizations, and equity focused investors to score applications for seed funding for entrepreneurs advancing clean energy and social equity innovations.⁴⁹ The Climate Change Research Program is an example of another state funded grant program that convened an Advisory Committee of environmental justice scholars, public health practitioners, social scientists, and community members to advance equity in the program.⁵⁰
- Establish paths towards wealth-building
 - The DOE must make sure that the program selects companies that have the potential to generate high road job opportunities in disadvantaged communities ("DACs") and workforce development support for awardees.

⁴⁹ *CalSEED Social Impact and Energy Equity*. California Energy Commission. <https://calseed.fund/impact/>

⁵⁰ Mohnot, S., Bishop, J., Sanchez, A., (2019). *Making Equity Real in Climate Adaptation and Community Resilience Policies and Programs: A Guidebook*. The Greenlining Institute. <https://greenlining.org/wp-content/uploads/2019/08/Making-Equity-Real-in-Climate-Adaption-and-Community-Resilience-Policies-and-Programs-A-Guidebook-1.pdf>

- The DPA should prioritize solutions that advance community-owned assets and infrastructure. The DOE can achieve this in the DPA by including community ownership as a selection criterion.
- Greenlining created a resource called the *Clean Mobility Equity Playbook Lessons from California's Clean Transportation Programs* that provides specific examples of how these principles have been incorporated by various clean mobility programs. The report contains a worksheet that the DOE can use to assess whether these six principles are being incorporated into all portions of the program's mission, process, outcomes, and evaluation.⁵¹

[Scoring Weighting] - Ensure that the criteria that prioritize equity are weighted appropriately in the scoring process.

- The reviewers should provide significant weight to the aforementioned selection criteria and should provide transparency of the weighting to prospective applicants. This weighting should be at least 40% under Section M: Evaluation Factors for Award of the solicitation in line with the Justice40 requirement that 40% of benefits directly go towards disadvantaged communities.
 - This criteria should be included in both Section L: Instruction to Offerors, to require bidders to submit documentation verifying how they meet the equity criteria, and Section M: Evaluation Factors of the final solicitation.
- In addition, the DOE can consider providing bonus points to applicants who are strong on equity related criteria. For example, other federal government agencies provide additional points for applications that have demonstrated experience conducting effective outreach and provided trusted support within disadvantaged communities. For example, the Federal Communications Commission provides bonus points for applicants that have demonstrated trusted relationships with disadvantaged communities and experience conducting inclusive outreach as part of the Notice of Funding Opportunity for the *Affordable Connectivity Outreach Grant Program*.⁵²

25. Equity standards: What equity standards should guide the government in carrying out DPA actions for the covered technologies?

⁵¹ Creger, H., Aguayo, L., Partida-Lopez, R., & Sanchez, A. (2021). *Clean Mobility Equity Playbook Lessons from California's Clean Transportation Programs*. The Greenlining Institute. <https://greenlining.org/wp-content/uploads/2021/03/Clean-Mobility-Equity-A-Playbook-Greenlining-Report-2021.pdf>

⁵² Notice of Funding Opportunity: *Affordable Connectivity Outreach Grant Program*. Federal Communications Commission. https://www.fcc.gov/sites/default/files/acp_outreach_grant_program_nofo.pdf

Greenlining's *Making Equity Real Framework*⁵³ is a tool that we use to ensure that equity is at the core of the entire program in every step including the goals, process, implementation, and evaluation. This framework was developed as part of Greenlining's efforts advising and shaping climate change grants in California. California offers a variety of climate change grants that aim to both fight climate change and also create a variety of other benefits. These grant programs can improve air quality and community health, reduce consumers' energy bills, and create clean economy jobs. But far too often these programs fail to adequately reach the communities with the greatest needs, especially low-income communities of color. For that reason, we believe officials designing these grants must make a conscious, thoughtful effort to embed social equity into all aspects of each program and grant-making process. We believe that these same considerations apply to federal grant making programs. Here is a brief overview of the framework:

1. The program's **Goals, Vision, and Values** should explicitly state the social equity goals of the grant program to help ensure these goals get prioritized.
2. The program's **Process** should include working with partners who have social equity expertise and incorporate strategies for inclusive outreach and technical assistance.
3. The **Implementation** of climate change grants is critical. Staff must make sure that grant awardees have the resources and tools they need to get the greatest possible environmental and economic benefits and minimize unintended negative consequences. Programs should target community-identified needs.
4. Finally, programs should **Evaluate** their impact, based on clearly defined social equity goals and criteria track success. This requires proactive planning to collect the data needed, so that administrators and officials can use the analysis to improve the program going forward and inform the design of future climate change grants.

Our theory is that by intentionally building equity into all aspects of a program, we can achieve the strongest equity outcomes in frontline communities.

To uphold equity in the DPA funding allocation, the DOE must ensure that equity is embedded throughout the program's:

I. Stated Goal, Mission, and Values

⁵³ Mohnot, S., Paykar, V., & Sanchez, A. (2019). *Social Equity in California Climate Change Grants: Making the Promise Real*. The Greenlining Institute.
<https://greenlining.org/publications/2019/social-equity-in-california-climate-change-grants-making-the-promise-real/>

- A. The DOE should clearly define diversity, equity, inclusion, and accessibility and community benefits plan, and make these definitions clear in the solicitation announcement.
- B. The DOE should clearly identify and communicate how the DPA initiative advances specific Justice40 priorities in the solicitation announcement

II. Process

- A. The DOE should conduct inclusive outreach and provide technical assistance to increase accessibility of this funding opportunity to minority-owned, women-owned, and disadvantaged businesses
- B. As part of the awardee selection process, the DOE should have a technical advisory committee that includes representatives from community based groups, community colleges, universities, apprenticeship and workforce training organizations, labor unions, tribal organizations, and MWDBEs
- C. The DOE should explicitly incorporate equity as a criteria for awardee selection
 - 1. The DOE should incorporate the *Greenlined Economy Guidebook's Six Standards for Equitable Community Investment* (outlined in response to Question 24) in its awardee selection criteria to advance proposals that:
 - a) Emphasize race-conscious solutions
 - b) Prioritize multi-sector approaches
 - c) Deliver intentional benefits
 - d) Build community capacity
 - e) Are community-driven at every stage, and
 - f) Establish paths towards wealth-building

III. Implementation

- A. The DOE should include technical assistance on skills such as marketing, outreach, and business development to ensure that manufacturers are equipped to effectively partner with contractors, utilities, and retail outlets who employ and serve residents of disadvantaged communities
- B. The DOE should provide a streamlined resource on all federal government programs that will procure DPA eligible technologies and help create partnerships with state and local governments to enable unit cost reductions from bulk procurement and greater economies of scale
- C. The DOE should provide training and support to awardees on developing and implementing a CBP and on social equity topics such as supply chain diversity,

internal DEIA practices, and equitable building decarbonization programs and policy

IV. Evaluation

- A. The DOE should coordinate evaluation of the DPA funding within the context of the DOE's larger Justice40 criteria and priorities
- B. The DOE should refer to research and case studies by community based groups and workforce development organizations leading on high road job creation and equity to develop evaluation criteria for awardees
- C. The DOE should build from successes and lessons learned from California Workforce Development Board's High Road Training Partnership program across the areas of equity, climate resilience, and job quality in evaluating the DPA program

As mentioned above, the DOE should coordinate evaluation of the DPA funding within the context of the DOE's larger Justice40 criteria and priorities and Equity Action Plan.

- The most relevant Justice40 policy priorities identified by DOE's Office of Economic Impact and Diversity are:⁵⁴
 - Decrease energy burden in disadvantaged communities.
 - Increase parity in clean energy technology (e.g., solar, storage) access and adoption in DACs.
 - Increase clean energy enterprise creation and contracting (MWDBEs) in DACs.
 - Increase clean energy jobs, job pipeline, and job training for individuals from DACs.
 - Increase energy resiliency in DACs.
 - Increase energy democracy in DACs.
- The most relevant DOE Equity Action Plan strategic equity goals are:⁵⁵
 - Increasing opportunities for new applicants to DOE funding opportunities
 - Increasing participation in DOE R&D and financial assistance programs

⁵⁴ U.S. Department of Energy General Guidance for Justice40 Implementation. U.S. Department of Energy, <https://www.energy.gov/sites/default/files/2022-07/Final%20DOE%20Justice40%20General%20Guidance%20072522.pdf>

⁵⁵ U.S. Department of Energy's Equity Plan, U.S. Department of Energy, https://www.energy.gov/sites/default/files/2022-04/DOE%20Equity%20Action%20Plan_Letterhead.pdf

- Expanding strategic tribal and stakeholder engagement across DOE programs
- The DOE should track whether the DPA advances the priorities set in the interim guidance as part of the program evaluation criteria. The DOE should prioritize the “Training and Workforce Development” benefits outlined in the interim guidance published on Justice40:⁵⁶
 - Training and Workforce Development
 - Increased participation in clean energy good job training and subsequent good job placement/hiring, including providing the free and fair chance to join a union and collectively bargain.
 - Increased participation in good job training programs that target participation from disadvantaged communities, including formerly incarcerated individuals and youth transitioning out of foster care
 - Increased climate-smart training, including training to identify waste, efficiencies, and GHG inventories.
 - Increased percentage of good job training programs within energy communities, such as those that include paid employment and that measure and report participant outcomes
- In addition to the DOE’s own internal guidance, the DOE should refer to research and case studies by community based groups, BIPOC led advocacy groups, and workforce development organizations leading on high road job creation and equity to develop evaluation criteria for awardees. There are several examples of work by and for community based groups and workforce development organizations cited throughout this comment letter.
 - Greenlining created a resource called the *Clean Mobility Equity Playbook Lessons from California’s Clean Transportation Programs* that provides specific examples of how these principles have been incorporated by various clean mobility programs. The report contains a worksheet on Page 23 that the DOE should use to assess whether the six principles discussed in our response to Question 24 are being incorporated into all portions of the program’s mission, process, outcomes, and evaluation.⁵⁷

⁵⁶ *Interim Implementation Guidance for the Justice40 Initiative*. (2022). Executive Office of the President Office of Management and Budget.
<https://www.energy.gov/sites/default/files/2022-07/Final%20DOE%20Justice40%20General%20Guidance%20072522.pdf>

⁵⁷ Creger, H., Aguayo, L., Partida-Lopez, R., & Sanchez, A. (2021). *Clean Mobility Equity Playbook Lessons from California’s Clean Transportation Programs*. The Greenlining Institute.

26. ***Additional comments:*** *Is there anything else that government should be aware of as DOE designs potential implementation of DPA tools to ensure projects benefits the American public, support underserved communities, and do not cause unintended harm to the environment or communities?*

The DOE should officially include the DPA as a DOE Justice40 Covered program and list this on the Office of Economic Impact and Diversity's website.⁵⁸ Officially including DPA as a DOE Justice40 covered program will enhance accountability and transparency and will enable advocates and community members to more easily track the implementation of the program. This will also give DPA awardees clarity on the criteria for program selection and evaluation.

CONCLUSION

The Greenlining Institute, 350.org, The Climate and Community Project, Kinetic Communities Consulting, and the Just Solutions Collective appreciate the opportunity to comment on the DPA Request for Information and we urge the DOE to address the recommendations and concerns outlined above. We look forward to continuing to collaborate with the DOE to track progress on this effort and hope that it can evolve into a powerful tool that enables equitable processes and tangible outcomes for frontline communities.

Please do not hesitate to reach out to Sneha Ayyagari (sneha.ayyagari@greenlining.org) with any questions or to schedule time to discuss our recommendations further.

Sincerely,

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<https://greenlining.org/wp-content/uploads/2021/03/Clean-Mobility-Equity-A-Playbook-Greenlining-Report-2021.pdf>

⁵⁸ DOE Justice40 Covered Programs, Department of Energy Office of Economic Impact and Diversity, <https://www.energy.gov/diversity/doe-justice40-covered-programs>

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