

Bipartisan Infrastructure Law - SECTION 40101(d)
PREVENTING OUTAGES AND ENHANCING THE RESILIENCE OF THE ELECTRIC GRID

Caddo Nation of Oklahoma
June 2023

Caddo Nation Resilience Program Narrative

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1. Objectives and Metrics:

Caddo Nation of Oklahoma (the “Tribe”) intends to use the following four (4) objectives to guide the energy resilience investment decisions as part of the Preventing Outages and Enhancing the Resilience of the Electric Grid Program (“Program”). The Tribe selected these objectives after considering Tribal priorities and needs, the possible scope of priority projects given our federal allocation¹, and Department of Energy’s (DOE) guidance as stated in the Administrative and Legal Requirements Document. The overarching objective of this Program is to improve the resilience of the electric grid against disruptive events, where a disruptive event is defined as an event in which operations of the electric grid are disrupted, preventively shut off, or cannot operate safely due to extreme weather, wildfire, or a natural disaster.

Caddo Nation of Oklahoma is a federally recognized Native American Tribe with approximately 7,121 members. The Caddo people live in parts of Oklahoma, Texas, Arkansas, and Louisiana, with most living in Oklahoma. Caddo Nation of Oklahoma is committed to responsibly managing tribal land in ways that promote economic and sustainable energy generation, sovereignty, and resiliency while improving the quality of life of the community in and around the area to provide more affordable energy for area businesses, create jobs, and stimulate economic activity for the benefit of the Tribe.

This Program Narrative, unless otherwise adopted, covers the duration of the Grid Resilience Formula Grants to States and Indian Tribes (IIJA Section 40101(d)). The Program will provide funding annually over a period of five years.

Objective 1: To deploy the 40101(d) funding to increase the resiliency of power supply serving Caddo Nation of Oklahoma’s Reservation. Under this objective, targeted resiliency measures will be evaluated based on the measure’s expected ability to mitigate the impact of disruptive events, especially natural disasters, on the electric grid. Fortifying electrical infrastructure is critical to responding to natural disasters.

¹ The Grid Resilience Formula Grants to States and Indian Tribes (IIJA Section 40101(d)) will provide funding annually over a period of five years. The amount allocated to the Tribe may change each year.

This objective will be assessed based on the improvement in resiliency as compared to the baseline prior to investment in the resiliency measure. The outcomes will be measured by the number of power outages experienced by the community in the years prior to the project as compared to the years following the resiliency measure. Power outage severity will be measured by duration (in hours) and number of community members/critical infrastructure that lost service.

Objective 2: To deploy the 40101(d) funding to develop distributed energy resources (DER) that in addition to providing system adaptive capacity during disruptive events on the electric grid allow the Tribal community to capture energy savings, generate revenue for reinvestment into the community, and control their energy future.

This objective will be measured through a combination of the following metrics: 1) the capacity in kW of the DER, 2) the ability of the DER to reduce the frequency and severity of disruptive events, and 3) the environmental impact of the DER.

Objective 3: To use the 40101(d) funding to increase energy justice in our Tribal community through resiliency measures that reduce (or eliminate) the impact of disruptive events on disadvantaged communities and at critical infrastructure.

This objective will be measured by the number of disadvantaged persons and critical infrastructure that benefit from the resiliency measure.

Objective 4: To select investments that strengthen the community through a combination of one or more of the following measures: strong labor standards and protections, partnerships with training providers, and the use of appropriately credentialed workforce, where possible.

This objective will be measured by the number of good-paying jobs created, as well as the number of local people employed or trained in relation to the resiliency measure.

2. Criteria:

The Tribe may or may not make subawards to eligible entities as part of this grant program. The Tribe is contemplating implementing projects through its own Tribal departments and/or entities within the exterior boundaries of the Tribe's Reservation. The Tribe will give priority to project(s) that will generate the greatest community benefit in reducing the likelihood and consequences of disruptive events. In selecting projects, the Tribe will consider how the federal funds can be used to leverage existing efforts in the community to decrease the impacts of disruptive events, especially on vulnerable communities and critical infrastructure. The Tribal Council, as the elected governing body of the Tribe, will select projects based on the merit criteria described below.

- ✓ Merit Criteria 1: The projected impact of the resiliency project, as measured through a combination of one or more of the following: reduced duration of power outages, reduced severity of power outages, and reduced number of people impacted by power outages.
- ✓ Merit Criteria 2: The projected community impact and alignment with the Tribe's energy and environmental goals, as measured by indicators reported on the following dashboard: <https://energyjustice.egs.anl.gov/>. The Tribe will prioritize investments in census tracts identified as a "Disadvantaged Communities" (DAC) by the Department of Energy. Within DAC census tracts, the Tribe will target investments that positively impact vulnerable populations (i.e., elderly, low-income) and critical infrastructure.
- ✓ Merit Criteria 3: The project's demonstrated support, as indicated by sources of funding for the balance of project costs (where applicable) and effort, to date, on scoping the project (i.e., feasibility studies, implementation planning).
- ✓ Merit Criteria 4: The project's likelihood of success in the near term, as demonstrated by technical and financial feasibility. The Tribe will prioritize projects that have completed a feasibility study that included economic analysis or have preliminary engineering design or project scope identified. This will work to maximize community benefit through fast tracking the most feasible projects.

3. Methods:

The Tribe will use the Tribal Council to select projects that will receive the 40101(d) funding. As elected representatives, the Tribal Council is very aware of the needs of the community and can appropriately select projects that will improve resilience by reducing the likelihood and consequences of disruptive events, generate quality jobs, and improve equity and community benefits. The Tribal Council can also rely on the appropriate Tribal departments to provide expertise on potential projects. The Caddo Tribal Council is the democratically elected governing body consisting of eight members: the chairman, vice chairman, secretary, treasurer and four representatives. The Tribal Council is empowered to adopt and implement all policies, plans, procedures, and applications for programs for the benefit of the Tribe and its Members. The Tribe will select third-party vendors to complete any planning, design, engineering, and/or construction work that cannot be completed by the Tribe (or any of its components). Contracting will be subject to the Tribe's procurement policies (i.e., competitive bids). The Tribe will track and make public during one or more Tribal Council meetings the following metrics:

- ✓ Metric 1: Reduction in number of power outages (i.e., frequency) experienced by the community in the years prior to the project as compared to the years following the resiliency measure.
- ✓ Metric 2: Reduction in the severity of power outages experienced by the community in the years prior to the project as compared to the years following the resiliency measure. Power outage severity will be measured by duration (in hours) and number of community members who lost service.
- ✓ Metric 3: The effectiveness of the investments at reaching vulnerable communities (i.e., elderly, low income, homeless) and at critical infrastructure (i.e., medical facilities, community facilities, emergency services).

The Tribe will follow the process outlined by the Department of Energy in the Statement of Project Objectives in implementing the Program, which includes the following four tasks:

Task 1 - Project Management & Administration: The Tribe will manage and administer all activities to achieve the project objectives, including tasks relating to grant reporting. The Tribe will also submit an initial Project Management Plan (PMP) within 45 days of the initial award and any subsequent PMPs within 90 days of the beginning of each budget period, as applicable.

Task 2 - Technical Assistance and Planning: The Tribe will submit the Program Narrative each year to receive subsequent allocations (if the Tribe wants to continue involvement in the Program).

Task 3 - Resilience Project Approval: The Tribe will prepare and submit Resilience Project Packages to the Department of Energy Project Officer in accordance with the Resilience Project and Subaward/Subcontract Notification Term in the Assistance Agreement.

Task 4 - Resilience Project Execution: Once the Department of Energy issues a written determination of adequacy regarding the Resilience Project Package, the Tribe will execute the approved resilience project engage contractors to execute assigned portions of the resilience project.

4. Funding Distribution:

The Tribe may or may not issue subawards to eligible entities as part of this grant program. The Tribe will implement projects through its own Tribal entities within the boundaries of the Tribe's Reservation. The Tribe reserves the right to engage qualified contractors to perform portions of the work on their behalf, either through a competitive bid process or direct hire.

5. Equity Approach:

The Tribe will strive to ensure that projects funded through this Program contribute to the country's energy technology, climate, and workforce development goals and promote the Department of Energy's equity, environmental, and energy justice priorities as part of the Justice40 Initiative. The Caddo-Wichita-Delaware OTSA has two census tracts with DAC status of disadvantaged. In total, there are 10 census tracts within Caddo-Wichita-Delaware OTSA with the following tracts at the highest grid resiliency risks:

- Census Tract 40017300100 has a DAC score of 20 and is in the 98 percentile of outage duration, 81 percentile of climate hazards loss of life estimates, and 91 percentile of non-grid connected heating fuel
- Census Tract 40015161600 has a DAC score of 19 and is in the 86 percentile of climate hazards loss of life estimates
- Census Tract 40015161700 has a DAC score 18 and is in the 73 percentile of non-grid connected heating fuel
- Census Tract 40015161800 has a DAC score of 20 and is in the 96 percentile of energy burden
- Census Tract 40015162000 has a DAC score of 17 and is in the 87 percentile of climate hazards loss of life and 83 percentile of non-grid connected heating fuel

TRIBE

TRIBE

5540R

- Name: Caddo-Wichita-Delaware OTSA
- DAC Status: **Disadvantaged**

Quality Jobs: The Tribe aims to use the funding provided through 40101(d) to expand good-paying, safe jobs that are accessible to all workers, and support domestic supply chains, where possible and applicable. Given the limited allocation, there are limited pathways to fund efforts that meaningfully attract, train, and retain a skilled workforce, while still funding the identified resiliency project(s). However, the Tribe, in alignment with their procurement policies, will work

to select vendors that provide employees with strong labor practices and source materials and equipment domestically. The Tribe will also prioritize selecting Tribal organizations and Native American owned enterprises.

Community Benefits: The Tribe will give priority to projects that will generate the greatest community benefit in reducing the likelihood and consequences of disruptive events. The Tribal Council will select projects using a set of pre-established criteria (outlined in Section 2 above). One of the criterium prioritizes community benefit, as measured by the degree to which the project impacts vulnerable and disadvantaged communities. The Tribe's vulnerable community members include community members experiencing poverty and those most adversely affected by disruptive events (i.e.: tornados, health emergencies). Projects targeting these populations will decrease the negative consequences to these community members, benefiting our community as a whole. The Tribe will also prioritize projects that will positively impact the largest number of households in the community, particularly since many of our community members fall under the definition of vulnerable or disadvantaged.

Diversity, Equity, Inclusion and Accessibility: The Tribe will share and maximize the project's benefits across disadvantaged communities, such as racial minorities and women, and will engage community leadership throughout the project's duration. Unlike State applicants, Tribal populations are understandably more homogenous. Projects that benefit the most residents and the most vulnerable reservations of the Reservation will benefit disadvantaged communities. The Tribal Council represents community leadership and will engage other community leadership by consulting with relevant Tribal departments about the project during the duration of the project. As needed, the Tribal Council will discuss the project during Caddo Nation Membership Meetings to solicit community feedback, particularly from community leaders.

Current Resiliency Planning: The 40101(d)(5) funding will enable the Tribe to go beyond measures that are already being undertaken through current Tribal resilience planning. Given the limited allocation amounts, the Tribe will be able to build upon current resilience efforts, ensuring that projects are completed in a timelier manner than originally forecasted. The Tribe is committed to responsibly managing its tribal land in ways that promote economic energy generation and resiliency while improving the quality of life of the community in and around the area. The Tribe has determined that one of the most practical ways to ensure energy resilience and economic development on its lands is to produce economic and sustainable energy. This is not only a conduit for finance, business, and infrastructure development but also a way to enhance the resilience of its hospitality operations, which serves as one of the largest employers in the area.

6. Technical Assistance and Administration:

The Tribe intends to utilize up to 5 percent of Federal grant funds for project administration and technical assistance costs. Project administration and technical assistance costs may include the following activities: reporting, compliance, grant administration, and project-specific administration. Polly Edwards, Grants & Compliance Administrator and Emergency Manager at Caddo Nation of Oklahoma, will be responsible for ongoing grant management, including preparing, reviewing, and submitting the Project Management Plan, Program Narrative, Resilience Project Package, and Quarterly Progress Reports.

Polly Edwards has been a member of the Caddo Nation staff for over seventeen years with multiple degrees in science and was the Environmental Director for over sixteen years. In the past eighteen months she has become the Grants & Compliance Administrator due to sixteen years of successful grant writing and management. Ms. Edwards oversees the environmental staff, and all grants awarded to the Caddo Nation of Oklahoma. She has multiple degrees in science, medicine, and social sciences. She continues to perform as the Emergency Manager for the Caddo Nation for over seventeen year and has contacts and established networking with multiple agencies including Homeland Security, FEMA, EPA, HUD, Department of Health and CDC. She has successfully written another DOE grant and administered the grant in 2009-2012 DOE EECBG grant DE-EE0001638. Under Emergency Management, Ms. Edwards have worked with federal, state and local agencies, VOADs, and utility companies during disaster in debris management, wildfires, and other disasters including contamination of sites, and site cleanups.

The Tribe is currently contemplating, subject to receipt of grant funding, contracting with Baker Tilly (Austin, TX) to perform necessary technical assistance and administration work under its direction. Ultimate selection of a contractor will be subject to the Tribe's competitive bid rules, where applicable.

Baker Tilly is a 90-year-old professional services firm that offers experienced renewable energy professionals who deliver innovative project finance and development support. They combine over 50 years of energy and utilities industry experience with a proven ability to help clients navigate energy projects from feasibility to ultimate completion. Specifically, Baker Tilly has excellent credentials and qualifications as it pertains to:

- An understanding of the intricacies of renewable energy projects on Tribal lands,
- Knowledge of renewable energy projects gained through involvement in many projects across the country,
- An in-depth understanding of the industry, the many participants, and what it takes to get renewable energy projects done, and
- A dedicated energy and utilities team of more than 30 individuals.

Since 2008, Baker Tilly has been involved with over \$3.5 billion of renewable energy projects that have been funded and are either operating or under construction. Baker Tilly has extensive experience working with government clients, including many state and local clients, as well as numerous Tribal clients, particularly in the area of energy consulting.