



August 22, 2022

Kelly Cummins

Acting Director and Principal Deputy Director for Clean Energy Demonstrations
U.S. Department of Energy
1000 Independence Ave. SW
Washington DC 20585

RE: Clean Energy Demonstration Program on Current and Former Mine Land Request for Information (RFI)

Dear Director Cummins,

The National Association of State Energy Officials (NASEO) appreciates the opportunity to submit comments in response to the U.S. Department of Energy's (DOE) Request for Information (RFI) on the Clean Energy Demonstration Program on Current and Former Mine Land in accordance with the Infrastructure Investment and Jobs Act (IIJA). NASEO represents the governor-designated State Energy Directors and their offices from each of the 56 states, territories, and the District of Columbia. In response to the RFI, NASEO encourages DOE to consider the following issues under Category 6: Equity, Environmental and Energy Justice (EEEJ) Priorities:

1. What information do communities, Tribal or State governments, or other stakeholders need to effectively engage with DOE on the Mine Land program?

State Energy Offices look forward to working with DOE on implementing the Clean Energy Demonstration Program on Current and Former Mine Land. As DOE is drafting and issuing the corresponding Funding Opportunity Announcement (FOA), important information on project selection criteria, detailed and attainable metrics to measure success, and requirements of project partners will enable State Energy Offices to effectively engage with DOE.

3. How can the Mine Land program ensure community-based stakeholders/ organizations are engaged and included in the planning, decision-making, and implementation processes, in both program development and individual demonstrations?

State Energy Offices often lead or are instrumental in convening community-based stakeholder and organizations on all relevant state energy policy decisions and issues. State Energy Offices not only know the relevant stakeholders but can ensure that communication on the DOE clean energy demonstration program is embedded in regular and ongoing engagement.

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Through NASEO's Equity Committee, the State Energy Offices are developing additional approaches to integrate equity considerations into energy policy, planning and program development and implementation. NASEO encourages DOE to work with the State Energy Offices in engaging the appropriate community-based organizations.

6. What factors should be considered when identifying and selecting the location of the technology/project/activity (e.g., economic considerations, policy considerations, environmental and energy justice considerations, geology, workforce availability and skills, current industrial and other relevant infrastructure and storage available/repurposed/reused, industry partners, minority-serving institutions (MSIs), minority-owned businesses, regional specific resources, security of supply, climate risk, etc.)?

In identifying and selecting the locations of the demonstration projects, NASEO encourages DOE to coordinate with State Energy Offices and on how the proposed project integrates with state energy goals and other state programs and projects aimed at achieving similar objectives. State Energy Offices lead the development of energy planning and policy in most states. State Energy Offices support their governors' advancement or practical energy policies, complete comprehensive state energy plans covering every energy production, distribution, and end-use sector, inform regulatory processes, engage with unregulated utilities and other energy providers on reliability and resilience issues, and support grid-related energy technology research, demonstration, and deployment investments. In partnership with the private sector, the State Energy Offices accelerate energy-related economic development and support meeting state energy affordability, reliability and climate goals through energy solutions that address their citizens' needs and enhance physical and cyber energy security. In doing so, State Energy Offices are part of long-term state energy planning, which often encompasses considerations of resilience and reliability, workforce development, clean energy and environmental goals, and stakeholder and community engagement. In particular, State Energy Offices lead the development of State Energy Plans and in most states develop and implement the State Energy Security Plans (SESP), which include risk assessments and risk mitigation strategies. Additionally, State Energy Offices have worked with NASEO and DOE to support state-focused energy and employment reports (similar to the national U.S. Energy and Employment Report) and have metrics on how to measure the workforce impact of energy projects in their states. Aligning the location of projects with existing state energy plans and programs would amplify opportunities for the DOE-funded projects. NASEO therefore encourages DOE to integrate that coordinating function into the Clean Energy Demonstration Program on Current and Former Mine Land.

We appreciate the opportunity to provide comments on this important issue. We look forward to continuing our partnership with DOE in supporting states on implementing the IJJA.

Best regards,

David Terry /s/

David Terry
Executive Director, NASEO