November 30, 2022

Submitted via *dpaenergy@hq.doe.gov*

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

To Whom It May Concern:

We appreciate the opportunity to provide our perspective in response to the Department of Energy's (DOE) Request for Information (RFI) on the Defense Production Act (DPA).

The American Public Power Association (APPA) is the national trade organization representing the interests of the nation's 2,000 not-for-profit, community-owned electric utilities. Public power utilities are located in every state except Hawaii. They collectively serve over 49 million people and account for 15 percent of all sales of electric energy (kilowatt-hours) to end-use customers. Public power utilities are load-serving entities, with the primary goal of providing the communities they serve with safe, reliable electric service at the lowest reasonable cost, consistent with good environmental stewardship. This orientation aligns the interests of the utilities with the long-term interests of the residents and businesses in their communities.

The Edison Electric Institute (EEI) is the association that represents all U.S. investor-owned electric companies. Our members provide electricity for more than 235 million Americans, and operate in all 50 states and the District of Columbia. As a whole, the electric power industry supports more than 7 million jobs in communities across the United States. In addition to our U.S. members, EEI has more than 65 international electric companies as International Members, and hundreds of industry suppliers and related organizations as Associate Members.

The National Rural Electric Cooperative Association (NRECA) is the national trade association representing nearly 900 local electric cooperatives and other rural electric utilities. America's electric cooperatives are owned by the people that they serve and comprise a unique sector of the electric industry. From growing regions to remote farming communities, electric cooperatives power 1 in 8 Americans and serve as engines of economic development for 42 million Americans across 56 percent of the nation's landscape. Electric cooperatives operate at cost and without a profit incentive.

Security and reliability of the energy grid is foundational to U.S. economic and national security, and critical energy infrastructure is uniquely necessary to support the operations of other critical sectors. To this end, we are very focused on finding solutions to meet our members' needs in response to the unprecedented supply chain challenges they are facing in securing equipment and material to provide reliable electric service to customers. Recent surveys show our members are waiting longer than ever for transformers of all sizes, conductors, meters, circuit breakers, and other products. Industry cannot solve this challenge alone and thus we are pleased to see the government may use its authority under the DPA to address challenges created by shortages of transformers and other key components of the energy grid.

We respectfully urge DOE to prioritize distribution transformers, large power transformers, and other critical grid components ahead of the other technologies considered in the RFI. Until we can address the shortages and supply chain challenges that are directly impacting reliability, we may not be able to accomplish many of the goals this administration has laid out for advancing clean technologies or expanding electrification. Most urgently, in the near-term, we urge DOE to act quickly to alleviate distribution transformer shortages, as this is the most acute supply chain challenge the electric industry is facing. We also ask DOE to establish longer-term efforts dedicated to supporting expanded domestic manufacturing capacity for large power transformers and other grid components that may take longer to address but are nonetheless critical to grid operations and therefore national security.

We provide our views in response to the questions posed in the RFI as follows.

Area 1: Technology Supply Chain Challenges and Opportunities

1. **For which of the technology areas covered in this RFI, or products therein, do you think most urgently require support from DPA tools and why?** Please fill out chart below for the technology(ies) for which you are providing input (among transformers and grid components; solar; insulation; and/or hydrogen components).

Technology	What are the decision criteria for your answer?
Transformers and grid components	Electric utilities are facing unprecedented challenges procuring transformers and other grid components needed to keep the lights on. Distribution transformers present the most urgent challenge, while challenges related to large power transformers and other grid components continue to emerge. Lead times for distribution transformers have increased on average from two to three months to more than a year. Lead times for large power transformers range from a year to over three years. In some cases, utilities are unable to even be quoted for a bid because the manufacturer is no longer taking further orders. Unless this situation is addressed, utilities will be hampered in their ability to restore power following natural disasters and storms, extend new electric service to customers, or support electrification initiatives being driven by federal and state policies.

2. What are the **greatest barriers (e.g., financing or market constraints)** to U.S. manufacturing, development, and deployment that the DPA tools described in the background can help address? Please respond for one or more technology areas below:

    a. Transformers and electric grid components: In the short term, it is our understanding from conversations with U.S. manufacturers that labor and material acquisition are the greatest barriers to increasing output for distribution transformers. High employee turnover and lack of available, eligible workers near manufacturing facilities make it difficult for U.S. manufacturers to immediately respond to increased demand for domestically manufactured transformers from utilities. Constrained access to domestically produced grain-oriented electrical steel (GOES), a material necessary to produce transformers, poses a significant material acquisition challenge. Although supplies of GOES are limited now, manufacturers will require more material to meet the increased demand for transformers as electrification continues. That need for sufficient material continues to grow as competing technologies that utilize the same materials are also growing. The present situation in which there is just one U.S. producer of GOES represents a serious national security risk.

    Additionally, U.S. manufacturers have indicated that certainty in demand will drive their decisions to invest in increased capacity. We've heard from manufacturers that they are unclear on whether the increased demand from electric utilities for transformers and other grid components is temporary or expected to

remain high and will continue to grow. Tools like loan guarantees and purchase guarantees can provide manufacturers with the certainty they need to invest in increased capacity.

In the longer term, there is a significant risk to grid reliability and national security in that there are no domestic manufacturers of large power transformers. This problem did not begin overnight and is well-documented in studies conducted by the U.S. government. We urge DOE to revisit the drivers for the outsourcing of large power transformer manufacturing to overseas markets and consider ways to entice manufacturers back to the United States.[1]

3. Which **DPA tool(s) and contracting vehicles would best help address the barriers** identified in Question #2, to strengthen U.S supply chains: purchases, purchase commitments, financial assistance, subsidy payments, or other (e.g. use of Other Transactions Authority or a Partnership Intermediary Agreement)? Please respond for one or more technology areas below:

   a. Transformers and electric grid components: Based on our discussions with U.S. manufacturers, it is our view that financial assistance that immediately supports distribution transformer manufacturers' ability to attract and retain a larger workforce over the next two years is critical to addressing the current and growing backlog. This is the most important piece to address in the short term and the most immediate DPA tool that we believe could be used to make headway on this challenge.

   The federal government should also consider using funds made available through the DPA in the near- and mid-term to provide financial assurances, including subsidy payments, loan guarantees, or purchase commitments, that enable U.S. distribution transformer manufacturers to invest in increased production capacity by lowering their financial risk. With a purchase commitment in place, any excess supplies the electric utilities do not purchase could be guaranteed purchase by the federal government once this supply chain crisis abates. Such excess could be used in case shortages exist in the future or to meet immediate challenges following natural disasters or storms.

   On a longer time horizon, these same tools could be used to address the dearth of U.S. manufacturers for large power transformers (LPTs). We encourage DOE to consider subsidy payments, loan guarantees, purchase commitments, and other available incentives that would bring manufacturers back to the United States and to look at how U.S. trade policy has impacted manufacturer decisions on investing in LPTs in the United States.

   Additionally, to have sufficient domestic supplies of GOES to support transformers and other grid components, the federal government should consider subsidy payments, loan guarantees, and purchase commitments to give U.S. steel producers the certainty they need to maintain, as well as to invest in, new and expanded capacity to produce GOES. In addition to supporting existing manufacturers, the electric power industry would benefit greatly from the addition of more entrants into the electrical steel market. It is critical to national security that the U.S. not lose domestic production of this vital material, especially as production of non-oriented electrical steel (NOES) increases to meet electric vehicle demand. The

[1] See the U.S. Department of Commerce report on "The Effect of Imports of Transformers and Transformer Components on the National Security" (October 15, 2020), available at: https://www.bis.doc.gov/index.php/documents/section-232-investigations/2790-redacted-goes-report-20210723-ab-redacted/file

government must signal the importance of maintaining as well as growing U.S. capacity to produce GOES and ensure that the increasing production of NOES does not occur at the expense of GOES.[2].

4. For the eligible technology areas covered in this RFI, **which segments in the supply chain do you think DPA tools should prioritize and why?** Please fill out the chart below for technology(ies) for which you are providing input and add rows for multiple entries per technology as needed.

Technology	**Upstream** (Critical raw materials production)	**Manufacturing** (Critical processed materials, subcomponents/ components, end products)	**End of life** (Recycling)	**Deployment** (Installation, infrastructure)
Transformers and grid components	*Grain-oriented electrical steel* *Copper*	*Distribution transformers and large power transformers* • *Transformer laminations* • *Stacked cores* • *Wound cores*		
Transformers and grid components		*Aluminum-conductor steel-reinforced cable*		

5. **Appendix I** provides two **illustrative example scenarios for how DPA authority could be used for each clean energy technology covered in this RFI.** These are not official proposals, but rather concepts for discussion. Which are the most promising approaches for spurring domestic production? Respond only for the technology(ies) for which you are interested in providing input. If there are additional project ideas you have that DPA tools can support, please provide those ideas in response to Question #6.

   DOE should prioritize providing financial assistance to U.S. distribution transformer manufacturers to support efforts to attract and retain a larger workforce. Additionally, DOE should provide financial assistance to U.S. manufacturers, including for distribution transformers, large power transformers, and other critical grid components, to either expand existing capacity or build new capacity. DOE should purchase and install, or provide financial assistance for the installation of, specialized equipment for component production. To help lower the manufacturers' risk associated with investing new capital, DOE should provide loan guarantees or purchase commitments to buy any excess material or equipment produced that utilities ultimately do not purchase. Additionally, DOE should provide financial assistance to manufacturers of GOES steel specific for the production of distribution or large power transformers.

   As is widely recognized, including by DOE, the energy grid is the backbone of the clean energy transition. While our collective members are leading the clean energy transition, it is imperative that clean energy technologies are not prioritized over or instead of critical equipment that is necessary to run a reliable energy grid. Electric vehicles cannot be charged and new renewable generation cannot be integrated into the grid if electric companies and utilities do not have sufficient supplies to reliably operate the grid.

   DOE could also provide financial assistance to support U.S. manufacturers investing in or adding test capacity or dual-use space at domestic facilities for the production of large power transformers, which are almost exclusively manufactured outside of the U.S. at this time. Some LPT manufacturers produce both LPTs and non-LPTs using the same facility, so increasing test space could help resolve manufacturing bottlenecks.

[2] This is a preferred option to Section 232 trade subsidies, which only serve to increase the cost of imported GOES that industry must use until there is sufficient domestic supply, which could take several years.

6. Building on answers from **question #4** above, **which project(s) do you think will have the greatest social and economic impacts, including strengthening supply chains, to the United States?** If possible, identify specific DPA tool(s) that you think may be more favorable to support proposed project(s), and, where possible, please indicate the level of investment needed. Please fill out the chart below for technology(ies) for which you are providing input and add rows for multiple entries as needed.

Technology	**Supply chain segment**	**Project**	**DPA tool(s)**	**Project impact**	**Level of investment (in U.S. dollars)**	**Other policy tools needed to support selected DPA tools**
Name the eligible technology (e.g., transformers and grid components; solar; insulation; and hydrogen components)	*Identify the supply chain segment (e.g., upstream; manufacturing; end of life; or deployment)*	*Identify a project that can be supported by DPA tools (e.g., manufacturing of X material or component)*	*Identify possible DPA tool(s) that could be applied to this project (e.g., purchases; purchase commitment; financial assistance)*	*Identify the impact this project will have (e.g., add X production capacity, create X jobs in Y, lower cost of energy by $x etc.)*	*Identify the ideal investment level needed for this project*	*Identify complementary policies or programs (e.g., provision in Bipartisan Infrastructure Law, CHIPS Act, and Inflation Reduction Act) that would support selected DPA tool(s)*
Transformers and grid components	Manufacturing	Manufacturing of distribution transformers - labor	Financial assistance; Subsidy payments	Attract or retain workforce to distribution transformer manufacturing	$440 million over two years	
Transformers and grid components	Manufacturing	Manufacturing of distribution transformers – capital investments	Financial assistance; Subsidy payments; loan guarantees; purchase commitments	Enable manufacturers to grow capacity with minimal financial risk	As much as $1 billion	
Transformers and grid components	Material	Incentivize existing steel producers to maintain or grow their production lines for GOES	Financial assistance; Subsidy payments; loan guarantees; purchase commitments	Add production capacity for GOES	As much as $1 billion	
Transformers and grid components	Deployment	Incentivize utilities to hold larger inventories of grid components	Subsidy payments	Add production capacity; improve grid resiliency	TBD	

7. For the technology areas covered in this RFI, which technology(ies), supply chain segments, and project type(s) do you think DOE can leverage DPA **tools to attract foreign companies and foreign direct investment** to the United States? Please fill out the chart below for technology(ies) for which you are providing input and add rows for multiple entries as needed.

   No response provided.

8. What **criteria/requirements/procedures should the government consider for selecting qualifying projects for DPA support?** Please fill out technology(ies) for which you are interested in providing input.

   a. Transformers and electric grid components:

      The use of DPA authorities ,42 U.S.C. §5195(a)(3), is tied to "national defense," which the DPA defines as "programs for military and energy production or construction, military or critical infrastructure assistance to any foreign nation, homeland security, stockpiling, space, and any directly related activity." Such term includes emergency preparedness activities conducted pursuant to title VI of The Robert T. Stafford Disaster Relief and Emergency Assistance Act [42 U.S.C. §5195 et seq.] and critical infrastructure protection and restoration.

      DPA Section 2(a)(4); 50 U.S.C. Appx. §2062(a)(4). Title VI of the Stafford Act defines "emergency preparedness" activities as

      > "All those **activities and measures designed or undertaken to prepare for or minimize the effects of a hazard upon the civilian population,** to deal with the immediate emergency conditions which would be created by the hazard, and to effectuate emergency repairs to, or the emergency restoration of, vital utilities and facilities destroyed or damaged by the hazard." 42 U.S.C. §5195(a)(3).

      Therefore, the use of DPA authorities extends beyond military preparedness and capabilities as the authorities may also be used to enhance and support domestic preparedness, response, and recovery from hazards, terrorist attacks, and other national emergencies, among other purposes. These explicit DPA priorities should guide DOE as it considers projects and other measures for DPA support.

      Given that the electric grid is critical infrastructure and is becoming even more important with the electrification of other critical sectors, national security is at stake when there is not a sufficient and readily available supply of transformers and other grid components. Moreover, emergency preparedness requires an adequate supply of replacement transformers of all kinds. Accordingly, DOE should prioritize transformers and other grid components through the use of its delegated DPA authority. In addition, consistent with many of the requirements for programs and funding under the Infrastructure Investment and Jobs Act, the government should thoughtfully consider criteria and requirements for U.S. ownership and control of where the government is investing federal funds. It is critical that the U.S. maintain and grow its capacity to produce transformers, grid components, and GOES.

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

We urge the government to consider and act on both short-term and long-term actions to increase the production of distribution transformers, large power transformers, and other critical grid components. As DOE has stated, "Ensuring that supply of grid components can swiftly meet demand and continue to meet demand long-term is vital to maintaining grid reliability; enabling quick recovery from hurricanes and other disasters; and supporting community, business, and demand growth."[3]

The existing and growing backlog of distribution transformer orders requires immediate action. We urge the government to prioritize this essential component crisis ahead of other technologies being examined for growth under this RFI. Without distribution transformers to distribute power from the grid to homes and businesses, these other technologies have limited value.

At the same time, we would urge the government to make a long-term commitment to investing in the U.S. production of grain-oriented electrical steel and large power transformers. The national security risks presented due to the lack of domestic capacity in this area are well documented.[4] Addressing these challenges will require a long-term commitment from the federal government to prioritize investing and maintaining this capacity in the interest of U.S. national security.

Area 2: Domestic Manufacturing, Including Small and Medium-Sized Scale Manufacturers (SMM)

10. **Which project types should DPA authority prioritize in supporting U.S manufacturers?** Where possible, please identify the level of investment needed. What criteria should DOE use to select these projects? Please fill out the chart below for technology(ies) for which you are providing input and add rows for multiple entries as needed.

Technology	**Manufacturing project**	**Manufacturing project impact**	**DPA tool (s)**	**Level of investment (in U.S. dollars)**	**Selection criteria**
Name the eligible technology (e.g., transformers and grid components; solar; insulation; and hydrogen components)	*Identify a manufacturing project that can be supported by DPA tools (e.g., manufacturing of X material or component)*	*Identify the impact this project will have (e.g., add X manufacturing capacity, create X jobs in Y, lower cost of energy by $x)*	*Identify possible DPA tool(s) that could be applied to this project (e.g., purchase; purchase commitment; financial assistance)*	*Identify the ideal investment level needed for this project*	*Identify the criteria that DOE should consider in selecting this type of project*
Transformers and grid components	Manufacturing of distribution transformers - labor	Attract or retain workforce to distribution transformer manufacturing	Financial assistance; Subsidy payments	$440 million over two years	U.S. distribution manufacturers who can increase output immediately with additional labor

[3] See "DOE Actions to Unlock Transformer and Grid Component Production" (October 20, 2022), available at: https://www.energy.gov/policy/articles/doe-actions-unlock-transformer-and-grid-component-production

[4] See the U.S. Department of Commerce report on "The Effect of Imports of Transformers and Transformer Components on the National Security" (October 15, 2020), available at: https://www.bis.doc.gov/index.php/documents/section-232-investigations/2790-redacted-goes-report-20210723-ab-redacted/file

Technology	Manufacturing project	Manufacturing project impact	DPA tool (s)	Level of investment (in U.S. dollars)	Selection criteria
Transformers and grid components	Maintain or increase U.S. production of GOES	Incentivize existing steel producers to maintain or grow their production lines for GOES	Financial assistance; Subsidy payments; loan guarantees; purchase commitments	As much as $1 billon	U.S. manufacturers
Transformers and grid components	Manufacturing of distribution transformers – capital investments	Enable manufacturers to grow capacity with minimal financial risk	Financial assistance; Subsidy payments; loan guarantees; purchase commitments	As much as $1 billon	U.S. manufacturers
Transformers and grid components	Manufacturing of large power transformers	Incentivize onshoring manufacturing of large power transformers and/or their components	Financial assistance; Subsidy payments; loan guarantees; purchase commitments	TBD	U.S. companies

11. For the eligible technology areas covered in this RFI, **which technology(ies) or supply chain segments do Small & Medium Sized Manufacturers (SMMs)** have capabilities or the most potential to grow their impact if supported by DPA tools? Please fill out the chart below for technology(ies) for which you are providing input, including supply chain segment, SMM capabilities, and the most relevant DPA tools. Add multiple rows per technology as needed.

    No response provided.

12. What are the **top three barriers that U.S. Small & Medium Manufacturers (SMM) face** that DPA tools combined with other government policy tools can help address? Please fill out the chart below for technology(ies) for which you are providing input, and add rows as needed.

Technology	Supply chain segment	SMM Barriers	DPA tool(s)	Other policy tools needed to support selected DPA tools
Name the eligible technology (e.g., transformers and grid components; solar; insulation; and hydrogen components)	*Identify the supply chain segment (e.g., upstream; manufacturing; end of life; or deployment)*	*Name one or more barriers inhibiting SMM participation growth in energy supply chain*	*Identify possible DPA tool(s) that could be applied to address barrier(s)* *(e.g., purchase; purchase commitment; financial assistance)*	*Identify complementary policies or programs (e.g., Bipartisan Infrastructure Law, CHIPS Act, and Inflation Reduction Act) that would support selected DPA tool(s)*
Transformers and grid components	Manufacturing distribution transformers	The uncertainty of whether demand will consistently grow, making capital investments risky	Purchase commitment	Advanced manufacturing tax credits; protection from foreign dumping

Technology	Supply chain segment	SMM Barriers	DPA tool(s)	Other policy tools needed to support selected DPA tools
Transformers and grid components	Manufacturing distribution transformers	Attracting and retaining workforce to distribution manufacturers	Financial assistance; Subsidy payments	

13. Historically, **what barriers have U.S manufacturers faced in accessing federal support** through the DPA or otherwise? What technical assistance or other support can DOE provide to overcome these barriers?

    No response provided.

14. Is there **anything else** that government should be aware of as DOE designs implementation of DPA tools to support U.S. manufacturers?

    The government must look holistically at the policies impacting manufacturers and ensure that U.S. trade policy does not result in unintended consequences for U.S. manufacturers. Further, trade policy can and has impacted the pace of various clean energy and grid modernization efforts that utilities are planning or working to implement.

Area 3: American Workforce Investment

15. **What kind of medium- or long-term market certainty would allow employers to feel confident about growing their staff and about investing in worker training?** Please include any related information in your response that you think is important to consider on technology(ies) for which you provide input below.

    a. Transformers and electric grid components: Our understanding is that distribution transformer manufacturers are willing to grow their staff and invest in worker training, but there are simply not enough people available from traditional workforce sources to fill open positions. For large power transformers, market certainty – which is impacted by trade policy – would help U.S. companies assess whether they can invest in building manufacturing capacity.

16. 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
Name the eligible technology supply chain activity (e.g., grain-oriented electrical steel production, solar PV cell fabrication)	*List the labor skills needed*	*Identify training programs and type of partnerships needed to address these labor skills*	*Identify the key partners needed*
Large power transformer manufacturing		Invest in workforce training that would require a change in training	Manufacturers U.S. Department of Labor

Supply chain activities	Labor skills need	Training programs/ partnerships to address need	Key Partners
		curricula and offering apprenticeships and internships in collaboration with industry	Educational institutions State and local governments
Distribution transformer manufacturing		Reentry to workforce programs, relocation programs, workforce eligibility programs, and other "outside-the-box" approaches	Manufacturers U.S. Department of Labor U.S. Department of Homeland Security U.S. State Department State and local governments

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

    No response provided.

18. 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?

    No response provided.

19. Is there **anything else** that government should be aware of as DOE designs implementation of DPA tools to support the creation of high-quality jobs and high-road workforce development needed for the clean energy transition?

    No response provided.

Area 4: Energy Equity, Community Access, and Economic Benefit

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

    Growing domestic manufacturing needs the support of an expanded workforce. Supporting a growing workforce for manufacturing transformers and grid components will bring more economic growth to the areas in which the workforce will live and work. These benefits should also be balanced with the need for additional resources that the area may need to invest in to support the workforce and their households, such as housing availability, schools, utilities, and other necessary resources.

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

    No response provided.

22. 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.

No response provided.

23. **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).**

       Manufacturing of distribution transformers exists in identified "underserved, overburdened or disadvantaged communities." Expanding current production or creating new facilities that will secure a national supply chain means more opportunities or new jobs in all of those identified areas.

    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).**

       No response provided.

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

       A potential barrier for disadvantaged communities might be the size of the labor force in a community, where migration into the area is deterred by a lack of infrastructure, such as shopping, dining, entertainment, housing, and other employment opportunities.

24. 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 encourage the government to factor into their criteria for selecting projects that value the ideals of diversity, equity, and inclusion (DEI) and encourage business practices that embrace DEI in their approach.

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

    No response provided.

26. 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?

    No response provided.