

Workplan

Section 1: Overall Project Summary and Approach

1.1. Description of GHG Reduction Measures

In 2020, Prairie Island Indian Community (PIIC) became one of the first tribal nations in the U.S. to set a bold goal to achieve Net Zero carbon emissions across our community. Since setting this goal, PIIC has undertaken several major carbon reduction projects, with construction currently underway. However, these projects fall far short of the full scope of action needed to meet the community's Net Zero goal. For this reason, PIIC submits the enclosed EPA Climate Pollution Reduction Grants (CPRG) application—to continue advancing the bold, exciting carbon-reduction efforts underway at PIIC and make significant additional progress towards becoming a Net Zero community.

PIIC requests a total funding of \$11,450,747, allocated across 9 targeted carbon reduction initiatives (CRIs) designed to electrify critical community infrastructure, retrofit existing facilities with energy-efficient technologies, adopt clean transportation options, and support workforce development in our community. The suite of initiatives proposed by PIIC epitomizes a holistic approach towards drastically reducing carbon emissions, bolstering energy efficiency, building community members skills and work opportunity, and promoting a sustainable lifestyle within our community.

PIIC believes strongly in taking on the burden of carbon-reduction action within our own community and facilities. For this reason, our proposed CRIs address major carbon-emission centers across our most critical facilities—from Treasure Island Resort and Casino (TIRC)—which is the community's economic center, sustaining the community financially and operating 24/7—to the PIIC Tribal Government Administration Building, Community Center, and Public Safety Building—all of which are essential to community services and government operations.

If EPA is unable to provide CPRG funding for all PIIC proposed CRIs, PIIC has prioritized the initiatives as indicated below and would plan to direct any allocated resources to the higher priority items first. Should other funding sources—via PIIC or other grants, tax credits, etc., become available to support the higher-priority initiatives—PIIC would also re-allocate CPRG funding to the next-priority initiatives.

Initiative 1 - PIIC Community Center and Public Safety Building Electrification

Description: PIIC's community center houses the PIIC community member health center/clinic, education department, and essential community meeting spaces—and the community center's HVAC system is rapidly nearing the end of its useful life. PIIC's public safety building houses the tribe's police, fire, and emergency services. PIIC proposes to develop a new, connected ground-source heating and cooling system that will serve both buildings (physically located near each other) and will replace the buildings' existing inefficient, carbon-intensive natural gas boilers and chillers.

Rationale for Selection: A geothermal / electric heat pump system was chosen for these buildings due to the high efficiency and reliability of the technology for heating and cooling benefits and PIIC's success with similar systems currently under construction at PIIC's TIRC facility. This electrified system will not only reduce carbon emissions but also lower energy costs and improve reliability.

Key Milestones:

- Finalize program concept and specifications
- Consultant and/or contractor procurement
- Project design, construction and permitting

- System commissioning
- Operations and maintenance planning and staff training
- Project close-out and turnover

Potential Risks

As with any critical facilities projects, it is important to select experienced, qualified partners to perform design and construction of the project. PIIC places strong value on selecting the best consultants and contractors to help mitigate this risk. Warranties will also assist in reducing any risk of equipment failure. PIIC must also identify and develop qualified staff (or external parties) to operate and maintain the system long-term. The community has a robust facilities team and decades of experience hiring the right resources to perform this work, and keep PIIC critical facilities operating well. Additionally, PIIC has strong experience with similar ground-source heating/cooling systems at its other facilities.

PCAP References:

- State of Minnesota PCAP, 3.2.1 Clean energy and efficient buildings - pg. 39
- Midwest Tribal Energy Resources Association, Inc. (MTERA) PCAP, 2.1.1.3. Geothermal Heating and Cooling - pg. 10

Initiative 2 - PIIC Interior and Exterior LED Lighting Retrofit

Description: This initiative involves converting fluorescent lighting to LED lighting across multiple community buildings and public spaces, enhancing energy efficiency, reducing operational costs, and improving environmental conditions for residents and guests. PIIC will convert to LED lighting and upgrade controls in the Tribal Government Administration Building, Community Center, Public Safety Building, and TIRC. PIIC will also replace exterior pole-mounted fixtures across the community parking lots.

Rationale for Selection: The current lighting systems are energy-intensive, costly to operate and maintain, and ineffective for creating productive workspaces and a comfortable environment for hospitality guests. Improved TIRC lighting is also important to create an attractive, inviting environment that draws guests to TIRC, maintaining operations that generate income vital to the Tribe's livelihood and government sustenance. Improved parking lot lighting is for community illumination and safety.

Key Milestones:

- Finalize program concept and specifications
- Consultant and/or contractor procurement
- Project installation and commissioning
- Project close-out and turnover

Potential Risks

Given the need for lighting upgrades across a wide breadth of PIIC facilities and community spaces, PIIC staff and partners will need to plan and execute installation well. PIIC expects to work with high-quality contractors, who exhibit requisite sensitivity, reliability, and attention to detail. Warranties will also assist in reducing any risk of equipment failure.

PCAP References:

- State of Minnesota PCAP, 3.2.1 Clean energy and efficient buildings - pg. 39
- Midwest Tribal Energy Resources Association, Inc. (MTERA) PCAP, 2.2.1. Building Retrofits & Energy Conservation Measures - pg. 11

Initiative 3 - PIIC TIRC Energy-Efficient Rooftop Piping Insulation

Description: Current piping insulation at TIRC is deteriorated and missing across the roof area which serves the major air handling equipment.

Rationale for Selection: Replacing the piping insulation with high density foam insulation and metal jacket across TIRC's roof area will result in energy savings by eliminating heat loss to the atmosphere and ensuring that heating fluid is at the proper temperature by the time it reaches end user equipment on the roof in extreme ambient temperatures.

Key Milestones:

- Finalize program concept and specifications
- Consultant and/or contractor procurement

- Project installation and commissioning
- Project close-out and turnover

Potential Risks

As with any critical facilities projects, it is important to select experienced, qualified partners to perform installation of the project. PIIC expects to work with high-quality contractors, who exhibit requisite sensitivity, reliability, and attention to detail. Warranties will also assist in reducing any risk of equipment failure.

PCAP References:

- State of Minnesota PCAP, 3.1.1 Clean energy and efficient buildings - pg. 36
- Midwest Tribal Energy Resources Association, Inc. (MTERA) PCAP, 2.2.1. Building Retrofits & Energy Conservation Measures - pg. 11

Initiative 4 - PIIC TIRC Wolf Tower Electrification

Description: This initiative seeks to improve PIIC's TIRC Wolf Tower by converting its heating/cooling system from natural gas to clean electricity, building on foundational work PIIC has already funded at its TIRC central plant and main facilities (to be completed 2025).

Rationale for Selection: PIIC current funding is insufficient to achieve the full TIRC electrification conversion PIIC intends to help the community reach Net Zero; until now, Wolf Tower has been excluded from improvement due to a lack of funding. Through the CPRG, PIIC will be able to complete additional building electrification work to reduce carbon emissions and save money.

Key Milestones:

- Finalize program concept and specifications
- Consultant and/or contractor procurement
- Project design, construction and permitting
- System commissioning
- Operations and maintenance planning and staff training
- Project close-out and turnover

Potential Risks

As with any critical facilities projects, it is important to select experienced, qualified partners to perform design and construction of the project. PIIC places strong value on selecting the best consultants and contractors to help mitigate this risk. Warranties will also assist in reducing any risk of equipment failure. PIIC must also identify and develop qualified staff (or external parties) to operate and maintain the system long-term. The community has a robust facilities team and decades of experience hiring the right resources to perform this work, and keep PIIC critical facilities operating well. Additionally, PIIC has strong experience with similar ground-source heating/cooling systems at its other facilities.

PCAP References:

- State of Minnesota, 3.1.1 Clean energy and efficient buildings - pg. 36
- Midwest Tribal Energy Resources Association, Inc. (MTERA) PCAP, 2.2.1. Building Retrofits & Energy Conservation Measures - pg. 11

Initiative 5 - PIIC TIRC Buffalo Tower Energy-Efficient Windows Upgrade

Description: PIIC will replace aging, drafty windows in hotel guest rooms located in the TIRC Buffalo Tower. PIIC plans to install low-E double paned window with an U-factor of 0.25.

Rationale for Selection: The current hotel guest room windows, installed in 1996, are in poor condition, making it hard to maintain comfortable room and space temperatures throughout the building without excess energy use for heating and cooling due to infiltration. With the interior heat loss in the winter and inefficient air conditioning for cooling in the summer, the Tribe's utility costs are excessively high.

Key Milestones:

- Finalize program concept and specifications
- Consultant and/or contractor procurement
- Project installation and commissioning
- Project close-out and turnover

Potential Risks

As with any critical facilities projects, it is important to select experienced, qualified partners to perform installation of the project. PIIC expects work with high-quality contractors, who exhibit requisite sensitivity, reliability, and attention to detail. Warranties will also assist in reducing any risk of equipment failure.

PCAP References:

- State of Minnesota PCAP, 3.1.1 Clean energy and efficient buildings - pg. 36
- Midwest Tribal Energy Resources Association, Inc. (MTERA) PCAP, 2.2.1. Building Retrofits & Energy Conservation Measures - pg. 11

Initiative 6 - PIIC Government Administration Building Electrification

Description: PIIC's tribal government administration building houses office and meeting space for tribal government officials and staff. PIIC proposes to replace the building's inefficient, carbon-intensive natural gas boilers and a cooling system with a clean electric system that incorporates ground-source heating and cooling.

Rationale for Selection: A geothermal / electric heat pump system was chosen due to the high efficiency and reliability of the technology for heating and cooling benefits and PIIC's success with similar systems currently under construction at PIIC's TIRC facility. This electrified system will not only reduce carbon emissions but also lower energy costs and improve reliability.

Key Milestones:

- Finalize program concept and specifications
- Consultant and/or contractor procurement
- Project design, construction and permitting
- System commissioning
- Operations and maintenance planning and staff training
- Project close-out and turnover

Potential Risks

As with any critical facilities projects, it is important to select experienced, qualified partners to perform design and construction of the project. PIIC places strong value on selecting the best consultants and contractors to help mitigate this risk. Warranties will also assist in reducing any risk of equipment failure. PIIC must also identify and develop qualified staff (or external parties) to operate and maintain the system long-term. The community has a robust facilities team and decades of experience hiring the right resources to perform this work, and keep PIIC critical facilities operating well. Additionally, PIIC has strong experience with similar ground-source heating/cooling systems at its other facilities.

PCAP Reference:

- State of Minnesota PCAP, 3.1.1 Clean energy and efficient buildings - pg. 36
- Midwest Tribal Energy Resources Association, Inc. (MTERA) PCAP, 2.2.1. Building Retrofits & Energy Conservation Measures - pg. 11

Initiative 7 - PIIC Public Safety Patrol Vehicle Electrification

Description: PIIC proposes to replace four gasoline-powered PIIC tribal police patrol vehicles with Ford hybrid-electric vehicles, and install four electric vehicle chargers at the public safety building to support the patrol vehicles.

Rationale for Selection: Replacing the use of PIIC's existing patrol vehicles, used on a near-daily basis, will lower GHG emissions while supporting community and public safety. Vehicles to be replaced are approximately 8-10 years old and are approaching end of life.

Key Milestones:

- Finalize equipment specifications
- Equipment and/or contractor procurement
- Charger installation and commissioning
- Equipment delivery and commissioning
- Staff training

Potential Risks

Given the importance of PIIC police and public safety services for community and TIRC guests' well-being, PIIC staff will thoughtfully select pursuit-rated vehicles that meet the requirements and needs of the police department and have vehicle chargers professionally installed. Warranties will also assist in reducing any risk of equipment failure.

PCAP References:

- State of Minnesota PCAP, 1.1.1. Clean transportation - pg. 19
- Midwest Tribal Energy Resources Association, Inc. (MTERA) PCAP, 2.3 Reduce Vehicle Emissions - pg. 13

Initiative 8 - PIIC Community Center Kitchen Electrification

Description: PIIC's community center houses the PIIC community member health center/clinic, education department, and essential community meeting spaces—and its kitchen is used for many community and public events and cultural activities. PIIC proposes to replace the community center kitchen's existing, old natural gas-based stoves and ovens with modern, high-efficiency, all-electric appliances.

Rationale for Selection: Replacing this equipment will lower GHG emissions while modernizing the kitchen to serve community and public events and services.

Key Milestones:

- Finalize equipment specifications
- Equipment and/or contractor procurement
- Equipment delivery and installation
- Staff training

Potential Risks

PIIC staff will thoughtfully select equipment that meets the community center needs and have it professionally installed to avoid any missed opportunities or health and safety risks. Warranties will also assist in reducing any risk of equipment failure.

PCAP References:

- State of Minnesota PCAP, 3.1.1 Clean energy and efficient buildings - pg. 36
- Midwest Tribal Energy Resources Association, Inc. (MTERA) PCAP, 2.2.1. Building Retrofits & Energy Conservation Measures - pg. 11

Initiative 9 - PIIC Tribal Member Workforce Development

Description: PIIC will develop and deliver a workforce development initiative to provide PIIC tribal members and their families with new skills, knowledge, and on-the-job experience, readying them for careers in the clean energy industry.

Rationale for Selection: Investing in workforce development will provide new job/economic opportunities for community members and will also help PIIC build a pipeline of workers to support the design, build, and ongoing operations and maintenance of PIIC infrastructure and systems.

Key Milestones:

- Design initiative parameters, processes, and tools
- Conduct community outreach
- Hire and onboard workers
- Worker training and ongoing field/office work (as relevant)
- Explore opportunities for long-term positions

Potential Risks

PIIC's primary objectives through workforce development are for tribal member participants to have a positive experience, gain valuable knowledge/skills, receive long-term career opportunities, as well as for PIIC projects to be completed effectively. PIIC staff will select workforce development partners who can support this intention, and PIIC staff and partners will work together to design an effective initiative towards these objectives.

PCAP References:

- State of Minnesota PCAP, 4.1.6. Provide technical and financial assistance to businesses to reduce emissions - pg. 41

1.2. Demonstration of Funding Need

PIIC has bold intentions to become a Net Zero carbon emissions community, but limited funding to do so. PIIC has considered numerous federal and state grant opportunities and PIIC believes that this CPRG opportunity is an excellent fit for our proposed CRIs, based on CPRG eligibility, technical, and economic criteria.

Private funding and much government funding do not include criteria for community-led programs because they are not captured by traditional ROI calculations and often require up-front capital expenditures deemed risky. Funding for this proposal is needed to fill the gaps we have identified in underserved communities. Without funding, the benefits of electrification and corresponding emissions reductions will skew to more advantaged individuals and slow the rate of adoption across multiple sectors of society.

PIIC is actively exploring a wide range of public and private funding sources to continue our Net Zero progress, but currently has no funding secured for these requested initiatives. If PIIC is awarded these requested funds, we are in a strong position to execute this work. The need is great, and we have sufficient experience and staff to oversee the implementation of these measures and secure the partners to perform the work.

EPA funding will enable PIIC to execute on the community values and help the community achieve its goal to become a carbon-neutral community. Also, by investing in upgrades to facilities that provide direct community services, PIIC is able to further compound the long-term community benefits. Funding could reduce the financial burden on the community, which is important to members, and by making these building and transportation improvements with the support of a direct grant (rather than financing or other shared-benefit model), will enable PIIC to own and leverage the full financial value.

1.3. Transformative Impact

With the support of the CPRG funding, these projects are poised not only to transform PIIC into a beacon of environmental justice and stewardship, but also to make a significant contribution to the national and global effort to mitigate climate change. The PIIC is a federally recognized Tribal nation, which the CEJST and Energy Justice Dashboard identifies as a disadvantaged community.

PIIC's people are descended from the Bdewakantunwan (Mdewakanton) Band of Eastern Dakota. Today, we live with the consequences of historical injustices that present serious environmental and health risks to our community, including:

- *Flooding and Climate Change:* In 1938, the U.S. Army Corps of Engineers built a Lock and Dam on the Mississippi River, without authorization, which flooded our community's land and left our Tribe with only 300 livable acres. As a result, the EJSCREEN TOOL confirms that PIIC has a high risk of flooding and wastewater discharge on the reservation.
- *Nuclear and Energy Injustice:* Over PIIC's objections, a nuclear power plant was constructed in 1973 less than 700 yards from the PIIC reservation where it continues to operate and store approximately 1,000 tons of spent nuclear fuel. The Tribe receives no energy from the power plant. Living in proximity to a nuclear operation and waste storage, the Tribe must remain vigilant of the risks and maintain constant emergency preparedness.

To address these threats and injustice, PIIC is making energy a positive force for our Tribe. CPRG funding for the CRIs in this proposal is an important contribution to PIIC's Net Zero goal. Together, these efforts embody PIIC's cultural values and reinforce our energy sovereignty. The CRIs provides cost savings as well as new learning and workforce

opportunities for community members. It helps mitigate the impacts of climate change. Finally, it demonstrates the Tribe's leadership in addressing the harm and injustices perpetrated against its community.

PIIC endeavors to create a Net Zero model for tribal communities, which is an important step toward affirming tribal rights and providing some measure of restorative justice. This includes serving as a proving ground for advanced electrification initiatives, including large-scale geothermal solution applications in cold climates and electrification of public transportation.

Section 2: Impact of GHG Reduction Measures

2.1. Magnitude of GHG Reductions

Total estimated carbon emissions reductions for the proposed CRIs are presented below.

Carbon Reduction Initiatives	Carbon Emissions Reductions (mtCO ₂)	
	2025 - 2030	2025 - 2050
INITIATIVE 1 - PIIC Community Center & Public Safety Building Electrification	614	5,697
INITIATIVE 2 - PIIC Interior and Exterior LED Lighting Retrofit	1,601	3,007
INITIATIVE 3 - PIIC TIRC Energy-Efficient Rooftop Piping Insulation	1,487	2,602
INITIATIVE 4 - PIIC TIRC Wolf Tower Electrification	896	7,328
INITIATIVE 5 - PIIC TIRC Buffalo Tower Energy-Efficient Windows Upgrade	200	452
INITIATIVE 6 - PIIC Administration Building Electrification	201	1,815
INITIATIVE 7A - PIIC Tribal Police Patrol Vehicles & EV Chargers	43	256
INITIATIVE 8 - PIIC Community Center Kitchen Electrification	59	738
INITIATIVE 9 - PIIC Tribal Member Workforce Development	N/A	N/A
Totals	5,102	21,895

2.2. Cost-Effectiveness of GHG Reductions

Total cost-effectiveness for the proposed CRIs is presented below, with additional important qualitative considerations PIIC hopes EPA will take into consideration.

Carbon Reduction	Cost Effectiveness	Qualitative Considerations
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Initiatives	(cost / reductions)		
	2025 - 2030	2025 - 2050	
INITIATIVE 1 - PIIC Community Center & Public Safety Building Electrification	8,693	937	PIIC's community center heating/cooling system is past its useful life and must be replaced soon. Investing in a low-carbon system now means the community will benefit from these reduced emissions for the full life of the system. Additionally, this funding will go towards facilities that support essential community operations and provide much-needed services to vulnerable populations as well as the broader community.
INITIATIVE 2 - PIIC Interior and Exterior LED Lighting Retrofit	259	138	Highly cost-effective and much-needed initiative to improve indoor and exterior spaces across the community, from government buildings to TIRC, the economic center of the community
INITIATIVE 3 - PIIC TIRC Energy-Efficient Rooftop Piping Insulation	360	206	Cost-effective initiative that builds on existing TIRC electrification / efficiency improvements, furthering the progress PIIC is making to its facility by avoiding heat/cooling loss.
INITIATIVE 4 - PIIC TIRC Wolf Tower Electrification	530	65	Highly cost-effective initiative that builds on existing TIRC electrification / efficiency improvements, connecting Wolf Tower to the re-built TIRC central plant—helping PIIC complete the vision of its ongoing TIRC electrification/geothermal project.
INITIATIVE 5 - PIIC TIRC Buffalo Tower Energy-Efficient Windows Upgrade	6,140	2,713	The TIRC Buffalo Tower windows are old and inefficient, causing energy loss and less-pleasant guest experiences. Making window improvements will reduce PIIC operations costs and ensure PIIC's economic development center continues to thrive.
INITIATIVE 6 - PIIC Administration Building Electrification	6,505	722	Enables PIIC to electrify the tribal government administrative building, which facilitates essential community operations and services. Would serve as a highly-visible example of low-carbon building solutions, given the building yields numerous and high-profile visitors each year.
INITIATIVE 7A - PIIC Tribal Police Patrol Vehicles & EV Chargers	7,970	1,328	PIIC tribal police patrol vehicles are coming to the end of their useful life, and will need to be replaced in the next few years. Funding will help buy down the cost of transitioning towards hybrid/electric vehicles, and serve as an example for future tribal transportation electrification.

INITIATIVE 8 - PIIC Community Center Kitchen Electrification	538	43	PIIC's community kitchen cooking equipment is in need of an upgrade, and investing in electric over natural gas-fueled equipment will reduce carbon emissions for years to come. It will also help community members get familiar / comfortable with electric stoves and ovens and consider these options for their own homes.
INITIATIVE 9 - PIIC Tribal Member Workforce Development	N/A	N/A	Workforce development supports the 8 initiatives above, helping design, build, and operate the initiatives, and ensuring they embody tribal values. This initiative also provides clean energy-based education and career opportunities for tribal members and their families.

Note: Costs included in this cost-effectiveness assessment are CRI-specific costs only, including equipment, construction, and contractual costs identified for each CRI. All other costs (personnel, indirect, fringe, and non-CRI-specific contractual, etc.) in PIIC's budget have not been included in this assessment.

2.3. Documentation of GHG Reduction Assumptions

Refer to the *Technical Appendix* for information on PIIC's carbon reduction assumptions and accounting/estimating methodology.

Section 3: Environmental Results – Outputs, Outcomes, and Performance Measures

3.1. Expected Outputs and Outcomes

Expected outputs include the completion of targeted CRIs that provide outcomes from energy efficiency to improved air quality, and healthier, more sustainable environments. The anticipated environmental results of this initiative are substantial, aiming to significantly decrease carbon emissions through the electrification of infrastructure, the retrofitting of facilities with energy-efficient technologies, and the adoption of clean transportation options.

The outcomes of this proposal are poised to set a precedent for community-led environmental action, showcasing the potential for meaningful impact in the fight against climate change. Through these efforts, PIIC not only aims to reduce its carbon footprint but also to foster a model of sustainability that can inspire and be replicated by other communities.

Expected CRI outputs and outcomes include:

Building Energy Consumption Reduction

- *Annual Reduction in Energy Consumption and Demand:* Decreased electricity usage as a direct result of implementing energy efficiency projects, such as lighting retrofits. Measurement: kWh (and kW, if available) reduction annually.
- *Annual Reduction in Energy Consumption:* Decreased natural gas usage as a direct result of implementing electrification projects, such as electrification of community center and administration buildings. Measurement: Therm reduction annually.

Vehicle Fuel Consumption Reduction

- *Annual Reduction in Fuel Consumption:* Decreased gasoline and/or diesel; usage as a direct result of replacing fossil fuel-powered vehicles with electric vehicles. Estimated Gallons reduction annually.

GHG Emissions Reduction

- *Annual Percentage Reduction in GHG Emissions:* Decrease in GHG emissions across all projects. Measurement: lbs/CO2 reduction annually.
- *Co-pollutant Impacts:* To the extent possible with available tools and info and as relevant to the CRI, PIIC will make an effort to track and quantify CAP and HAP impacts. Measurements: TBD.

Cost Savings

- *Annual Reduction in Operational Costs:* Savings in building, vehicle, and equipment operational costs, including utility bills and maintenance costs, due to the implementation of modern, efficient systems. Measurement: dollar reduction annually.

System Performance and Reliability

- *Operational Efficiency:* Other to-be-determined indicators of efficient operations and system performance, such as reduced maintenance costs, higher system efficiency, etc. Measurements: TBD.

Workforce Development

- *PIIC Workforce Participation:* Indicators of successful engagement and training/work placement for PIIC tribal members and their families. Estimated participation of 2-5 members. Measurements: participating individuals.

PIIC Planning and Administration

- *CRI Completion:* Successful design and delivery of CRIs.
- *EPA Positive Review:* Compliance with EPA requirements and receipt of positive feedback/reviews from EPA officers. Measurements: TBD.

3.2. Performance Measures and Plan

PIIC will track, measure, and report its CRI outputs and outcomes noted in *Section 3.1*, where possible and appropriate for each CRI. In the planning stage of each initiative, PIIC will identify the relevant, measurable outputs/outcomes and establish a CRI-specific measurement plan, including what info should be shared with EPA vs. tracked and reported internally. Today, PIIC does not have a complete inventory of data and other resources that will be essential to these strategies, and therefore will develop these plans through the initiative design phase. Each plan will leverage the key tenants of our umbrella CRI General Performance Framework developed below—to evaluate CRI impacts and align with core principles of clarity, specificity, and measurability.

CRI General Performance Framework:

Phase 1. Planning and Procurement

- Identify KPIs for target outputs / outcomes related to the initiative design and intended operation
- Communicate these expectations to partners and embed requirements in contracts
- PIIC project management to establish initiative-specific and cross-initiative measurement strategies, based on available data and resources

Phase 2. Initiative Implementation

- Implement methods, tools, and resources necessary to performance monitoring

Phase 3. Monitoring and Reporting

- Implement continuous monitoring of performance against established KPIs to evaluate the effectiveness of each initiative .
- Semi-annual reports for PIIC and EPA detailing progress towards KPIs, as well as final project close-out report

3.3. Authorities, Implementation Timeline, and Milestones

3.3.1. Authorities, Roles, and Responsibilities

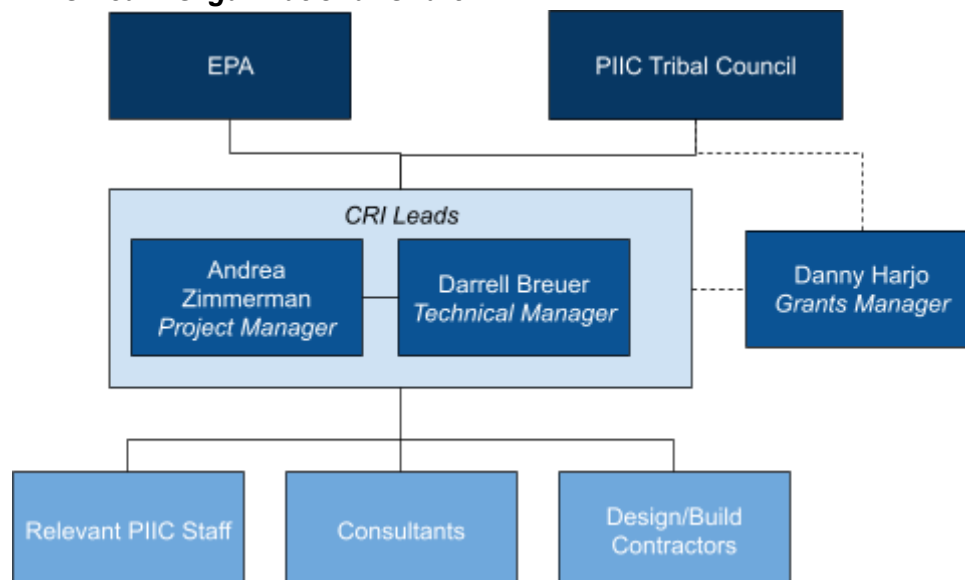
PIIC has a proven approach for project/program management, which provides for clear lines of authority and responsibility; effective communication, planning and reporting; cost and schedule control; quality control; worker health and safety; on-time reporting; and productive interface and communications with EPA, partners, and consultants/contractors. PIIC, and its designated staff, collectively, have the authority to carry out the proposed CRIs during the grant period.

The CRIs will be led by three PIIC staff members:

- **Andrea Zimmerman, Project Manager:** In her role, Andrea Zimmerman will shape the project vision, lead the team, facilitate procurement, oversee partners, manage the budget, and coordinate with community stakeholders and PIIC Tribal Council.
- **Darrell Breuer, Technical Manager:** In his role, Darrell Breuer will lead design and construction of the projects, including technical partner oversight, technical investigations and decision-making, infrastructure integration, and permitting and right-of-ways.
- **Danny Harjo, Grants Manager:** In his role, Danny Harjo will oversee PIIC administration of the grant and compliance with federal requirements.

The above staff will collaborate closely and provide oversight for all aspects of the CRIs and supporting partners and staff. Consultants and contractors will be procured, as needed for each CRI, through Phase 1 (described in Section 3.3.2), upon award. Figure 1 illustrates PIIC team management and administration of the CRIs.

Figure 1: PIIC Team Organizational Chart



3.3.2. Implementation Timeline and Milestones

PIIC will implement CRIs, based on the following overarching framework. Implementation phases for each CRI will be adjusted to the specifics of the CRI, and finalized upon award.

Phase 1: Planning and Procurement

- Finalize CRI conceptual CRI designs and specifications.
- Conduct procurement for CRI partners, materials, and technologies
- Establish CRI teams, including relevant staff, consultants, and contractors
- Develop project assurance project plans for CRIs

Phase 2: Initiative Implementation

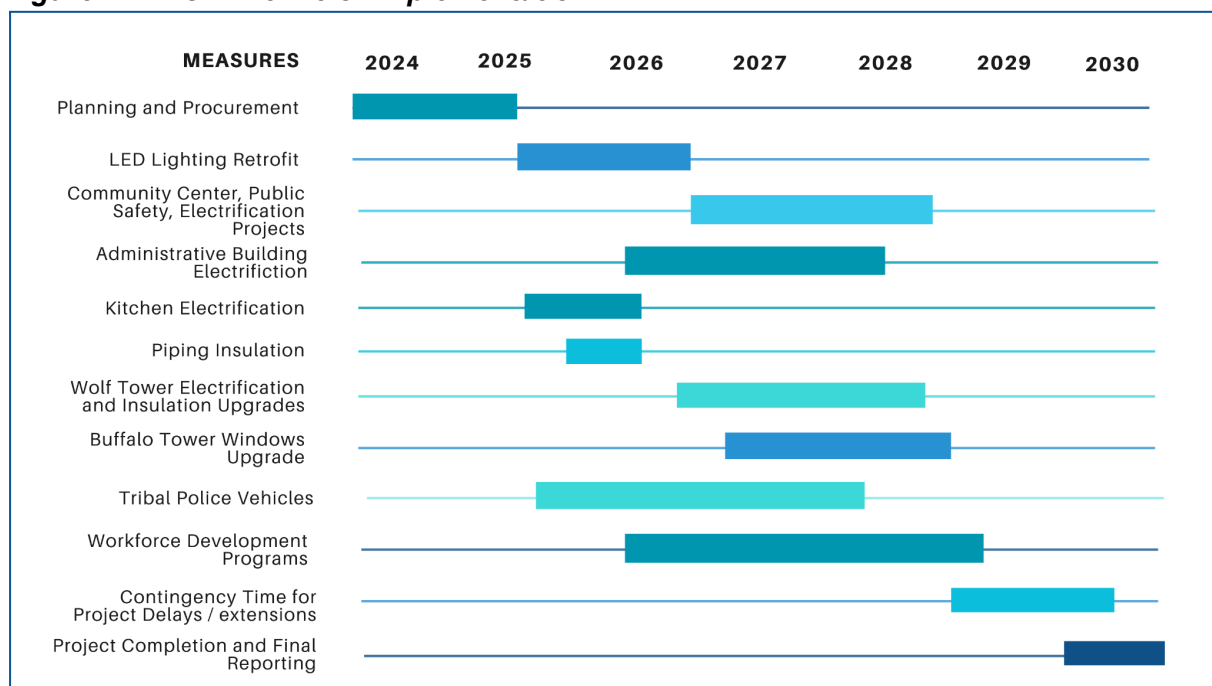
- Complete CRI final design and order equipment
- Perform construction and/or installation
- Commission systems to ensure specification compliance and ready for operations
- Create and implement workforce development initiative concurrently
- Conduct any necessary staff training; provide manuals / guides
- Develop operations and maintenance plan
- Final turnover and CRI initiative

Phase 3: Monitoring and Reporting (Ongoing)

- Internal monitoring and reporting on CRI progress
- Reports for EPA

Figure 2 provides a visual timeline of the expected implementation timing and milestones for the proposed CRIs. This timeline outlines the key phases from planning and procurement through project completion and final reporting, providing a clear roadmap for implementation.

Figure 2 - PIIC Timeline of Implementation



Section 4: Low-Income and Disadvantaged Communities

4.1. Community Benefits

The proposed CRIs will help PIIC transition to clean, reliable energy across its tribal buildings, which are essential to conduct tribal government business, provide community meeting space, deliver tribal member services, and support tribal economic development. Additionally, the CRIs will support the transition of tribal vehicles from dirty fossil fuels to clean electric solutions.

PIIC will receive specific benefits through the proposed CRIs, including:

- **Reduced GHG emissions** achieved by transitioning community facilities and assets to cleaner energy technologies and fuels, which helps mitigate local climate change hazards, including flooding, and helps PIIC achieve its Net Zero goal.
- **Energy cost savings** achieved through the use of reliable, energy-efficient systems and equipment, enabling these savings to be reallocated to other community uses.
- **Replacement of old systems and equipment**, which is carbon-intensive, unreliable, and approaching the end of its useful life, with low-carbon, high-efficiency, modern solutions that will deliver reliable benefits over the long term.
- **Strengthened community health, safety and comfort** by replacing natural gas equipment with high-efficiency electrical equipment that improves air quality and indoor climate control. Additionally, upgrading the energy systems at facilities that provide community services will help secure the most vulnerable tribal members' access to reliable PIIC medical clinic and other services.
- **Community learning** through demonstration of successful clean energy project implementation and opportunities for workforce development for tribal members and their families.
- **Tribal sovereignty** is expressed through the principles which are rooted in the Dakota people's values, i.e., honoring nature, harvesting its potential, and cultivating a sustainable world for the next seven generations.
- **PIIC public leadership on decarbonization**, which provides new opportunities for PIIC to connect and share with other Tribes and communities, building collective climate action.

As noted in the FOA, the CPRG program considers federally recognized tribes such as PIIC as meeting the definition of disadvantaged communities for the purposes of this grant. Refer to the detailed budget spreadsheet for info on relevant tract / block group IDs.

Section 3 identified the quantitative outcomes PIIC intends to track and report. PIIC will informally monitor other qualitative indicators of the benefits noted above, including through staff, community, partner, and industry conversations and actions.

4.2. Community Engagement

The CRIs will be led and owned by the PIIC tribal government and delivered on behalf of the PIIC community. In 2020, PIIC became one of the first tribal nations to set a goal to achieve Net Zero carbon emissions. The Tribe conducted meetings, focus groups, and interviews with community members of all ages to inform the best pathways towards this goal. PIIC heard from community members about their commitment to ecological stewardship of ancestral lands and the importance of clean energy solutions for the economic and cultural well-being of the Tribe. We have learned that community members have been underserved by their electric and natural gas utilities and other local stakeholders in finding clean energy solutions for the community. Ultimately, this input helped the Tribe prioritize its Net Zero tribal values, projects, and technologies.

The proposed CRIs play a critical role in PIIC's progress towards Net Zero. PIIC continues to receive community input and build support for PIIC Net Zero efforts through a variety of efforts, including:

- Ongoing quarterly community meetings facilitated by tribal government staff, providing opportunities to share updates on Net Zero progress and to solicit community input on project design, siting, and other topics.

- Workforce development program, providing clean energy training and job opportunities to tribal members as part of PIIC-led decarbonization projects.
- Other meetings, field trips, activities, classes, and informal conversations, engaging community members in discussions focused on their energy needs and climate issues.

Section 5: Job Quality

The measures proposed by the PIIC are specifically designed to serve the residents and members of the PIIC, a community deeply rooted in cultural heritage and committed to sustainable living. This target population encompasses all individuals who live, work, or participate in community activities within the PIIC jurisdiction, including Tribal members, employees of Tribal enterprises, and visitors to community facilities such as the TIRC Wolf Tower, community center, public safety building, and educational institutions. The initiatives aim to benefit a wide demographic, which includes children and families, and employees within the Tribal government and associated enterprises, as well as the elderly and vulnerable populations who rely on these services for their well-being and cultural activities.

In addition to cutting carbon through CRIs, PIIC places a strong emphasis on fostering high-quality job creation through tribal workforce development. PIIC will educate and train community members in skills, knowledge, and on-the-job experience needed to pursue sustaining work opportunities in the green economy. Central to this effort is the recognition that PIIC's Net Zero goal requires not just capital investment in technology but also in the people who can help us design, build, operate, maintain, and innovate our systems. PIIC plans to create a variety of job opportunities that are essential for the successful implementation and ongoing operation of the proposed CRIs. These jobs are expected to include technical positions related to the construction and installation of CRI energy-efficient and electrified systems/equipment as well as potential roles in non-technical fields, such as project management, education, and community outreach.

Importantly, these positions are projected to offer competitive wages, benefits, and the potential for career advancement, contributing to the overall economic well-being and resilience of PIIC. We anticipate 2-5 community members will participate; this number is based on the relative size of the community and our experience with similar past workforce initiatives.

PIIC also places emphasis on education and training poised to yield benefits beyond immediate job creation. It is important that these workforce initiatives include transitional pathways to help community members identify possible permanent positions after initiative completion and support them in accessing these opportunities, whether at PIIC or elsewhere in the industry. We will seek partners that support this goal and offer resources to assist. The formal details and partners for this workforce initiative will be developed upon award and with community member input; however, we know that the initiative would include a combination of education, training and compensated field experience, enabling members to apply learned skills alongside seasoned experts through the proposed CRIs.

By fostering a culture of sustainability and energy consciousness, our workforce development initiative aims to empower community members with the knowledge and skills to make informed decisions about energy use, both in their professional roles and personal lives. This not only enhances the project's impact through increased community engagement but also supports the broader goals of environmental stewardship and climate action.

Section 6: Programmatic Capability and Past Performance

6.1. Past Performance

PIIC is a long-standing recipient of federal and state grants, with a positive record of effective grant management and project success. Examples include:

EPA Grants (CFDA 66.605) - The US Environmental Protection Agency (EPA) awarded \$428,000 to PIIC under a Performance Partnership Grant (PPG). The PPG is an umbrella contract where several related programs are housed to streamline tribal grants management. For PIIC, this includes:

- The Indian Environmental General Assistance Program (GAP),
- The Clean Water Act (CWA) Section 106,
- The Clean Water Act (CWA) Section 319.

The funding requires a detailed workplan for each of the programs and a detailed budget over a four-year term. Quarterly and annual reporting is required. FY 2023 – 2027 is PIIC's latest 4-year funding award, representing a little over one million dollars. For more than 16 years, PIIC has been awarded and successfully managed PPG funding with no material audit findings.

Minnesota Pollution Control Agency (MPCA) DERA Grant (CFDA 66.040) - The MPCA awarded PIIC a Diesel Emissions Reduction Act (DERA) grant in the amount of \$300,000. The project objective was to reduce diesel engine emissions from two heavy-duty, Tier-0 (non-regulated) proposal engines and one Tier-0 generator engine used in a river tour boat operation on the Mississippi adjacent to tribal lands. PIIC replaced the old engines with new Tier-3 diesel engines to repower the 79,000-pound tour boat. The old engines were destroyed. PIIC spent down all funds, provided a final report, and MPCA closed the grant with full satisfaction.

US Department of Housing and Urban Development (HUD) Grants - HUD's Office of Native American Programs (CFDA 14.024) provided PIIC with \$87,122 in funding to provide general housing assistance to community members. The grant / program is still in development and PIIC will be responsible for an annual report. Through the Bureau of Indian Affairs, HUD also provided PIIC with \$86,000 in funds to deliver a Home Improvement Program to tribal members. The Program provides \$3,000 per home to improve, correct, or make repairs to their property providing safer, healthier homes for our community members. Priority is given to tribal elders and tribal members with a disability. This program is still in development and PIIC will be responsible for an annual report.

Federal Transportation Administration (FTA) (CFDA 20.526) - Low-No Shuttles and Buses Program - FTA has awarded \$1,616,426 in funding to PIIC for its Vehicle Electrification project to transition PIIC public transportation fleets to low-polluting, energy-efficient vehicles. PIIC will use the funding to replace community service vehicles that are fossil-fueled with electric vehicles and to install charging infrastructure. The project is expected to commence in 2023. This program is still in development and PIIC will be responsible for an annual report.

6.2. Reporting Requirements

PIIC has a well-documented history of adherence to reporting requirements under federal agreements, consistently demonstrating our commitment to transparency, accountability, and excellence. Our history of meeting reporting requirements under previous assistance agreements reflects our dedication to successful project implementation and the fostering of strong, trust-based relationships with our funding agencies. We believe that our consistent performance in this area demonstrates our capability and reliability as a partner in achieving shared environmental and community development goals.

Over the years, PIIC has submitted both financial and programmatic reports to include SF-425s and programmatic progress reports (PPRs), that meet and often exceed the expectations set forth in these agreements. These submissions have been recognized as acceptable and commendable by our federal partners, showcasing our dedication to

thorough and timely communication. Our reports have meticulously detailed our progress towards achieving the expected outputs and outcomes of each agreement, providing clear, data-driven insights into the milestones reached and the impact of our initiatives. PIIC's reports have been instrumental in fostering a transparent dialogue with our federal partners, allowing for effective oversight and collaboration. By adequately reporting our progress, we have built a strong foundation of trust and reliability with these entities, demonstrating our capability to manage and execute projects that align with our shared goals of sustainability, community development, and environmental stewardship. This history of meeting reporting requirements underlines PIIC's capability and reliability as a partner in federally supported projects. It reflects our organization's robust internal processes for monitoring, evaluation, and communication, as well as our unwavering commitment to achieving the objectives set forth in our collaborations with federal agencies.

6.3. Staff Expertise

PIIC has successfully executed numerous community-benefit programs, relying on tribal staff leadership, expertise, and capabilities. For the proposed projects, PIIC will rely on three key staff members, who will also collaborate with the PIIC elected Tribal Council, tribal community members, and other staff. These key individuals include:

Andrea Zimmerman, Project Manager: In her role, Andrea Zimmerman will shape the project vision, lead the team, facilitate procurement, oversee partners, manage the budget, and coordinate with community stakeholders and PIIC Tribal Council.

Ms. Zimmerman has more than 14 years of experience in the clean energy industry, working with utilities, local and Tribal Governments, trade organizations, and industry product and service providers. In her current position on the PIIC Tribal Government staff, Ms. Zimmerman is a clean energy specialist and project manager. Over the past two years, she has led the Tribe's Net Zero initiative, with a budget of approximately \$50 million. In this capacity, she has encouraged and directed PIIC community member engagement on clean energy topics, presiding at community meetings, facilitating program activities and communications, overseen partner consultants and contractors, managed the budget, and reported initiative progress to Tribal Council and grant funders.

Previously, during her seven years at TRC Companies, an energy and sustainability consulting firm, she was a project manager and key contributor to strategic energy and carbon reduction plans, clean energy programs/projects, and a wide range of internal strategy, business development, marketing, and operations initiatives.

Darrell Breuer, Technical Manager: In his role, Darrell Breuer will lead design and construction of the projects, including technical partner oversight, technical investigations and decision-making, infrastructure integration, and permitting and right-of-ways.

Serving as the Director of PIIC Projects and Initiatives since 2022, Darrell has demonstrated exceptional capability in overseeing infrastructure project design and construction, ensuring projects are completed efficiently and effectively. Prior, during his tenure as Director of Support Services since December 2001, Mr. Breuer managed complex operations across maintenance, facilities, environmental services, valet and transportation, and construction departments for a significant property portfolio. Darrell has successfully oversaw construction projects totaling over \$170 million, including the development of event centers, hotel remodels, and outdoor entertainment venues. This experience highlights his ability to oversee large-scale projects, manage substantial operating budgets exceeding \$12M annually, and improve occupancy rates significantly.

Darrell's earlier roles as Project Superintendent, Maintenance Manager, and Assistant Maintenance Manager have furnished him with a comprehensive understanding of construction management, maintenance operations, safety and building codes compliance, and strategic planning for renovations and expansions.

Danny Harjo, Grants Manager: In his role, Danny Harjo will oversee PIIC administration of the grant and compliance with federal requirements. With a distinguished career spanning over two decades at PIIC and a rich background in project management and procurement, Danny is poised to oversee the administration of the grant and compliance with federal requirements for the proposed projects. Serving as the Grants & Contracts Dept. Manager at PIIC since 2005, Harjo has demonstrated unparalleled expertise in managing intricate grant processes and ensuring adherence to contractual obligations.

His tenure at the National Center for American Indian Enterprise Development (NCAIED) from 1990 to 1999 further solidified his credentials, where he excelled in various roles, including Acting Vice President, Project Director, Senior Management Consultant, and Procurement Specialist. Harjo's experience covers a wide spectrum, from directing projects to consulting in management and procurement, emphasizing his capability to navigate the complexities of federal compliance and grant management effectively. His education from Harvard Business School Executive Education, focusing on Leading People and Investing to Build Sustainable Communities, aligns perfectly with the PIIC's mission, ensuring that Harjo is exceptionally qualified to guide the administration of this grant towards achieving its goals in sustainability and community development.

Section 7. Budget

7.1. Budget Detail

Personnel

PIIC requests funding for a two-year salary for a new Technical Coordinator or Associate Project Manager position to be hired to support development and build of the CRIs, upon award. This staff person will report to and support PIIC staff leaders identified within this grant application as a dedicated resource. The annual salary for this position assumes \$90,000 per year @ 100% full-time equivalent position, including a 3% annual cost of living increase for year two.

Fringe Benefits

One proposed PIIC staff person (FTE) will receive a standard compensation package at a fringe rate of 24%.

Travel

No travel is included in this budget.

Equipment

Equipment is specific to each relevant CRI. Equipment costs for CRIs #1-6 and 8 are based on preliminary designs developed by energy engineers and contractors hired by PIIC, including a wide range of equipment types. Equipment costs for electric vehicles and chargers included in CRI #7 is based on cost estimates collected from vehicle manufacturers and charger contractors.

Supplies

No travel is included in this budget.

Contractual

Contractual costs comprise the following categories:

- *Procurement Consultants* - Consultants will support PIIC in conducting procurement activities for the CRIs. Consultants will assist PIIC in developing technical specifications and requests for proposal materials, facilitating procurement efforts, and evaluating and selecting design-build contractors and other consultants. Procurement costs are based on an estimated 2-5% of the total cost of each CRI we anticipate will require these services; this is consistent with PIIC's past experience in using procurement consultants for projects of similar scope and size.
- *Owner's Engineer Consultants* - Consultants will support PIIC in providing oversight and third-party verification of design-build contractors across relevant CRIs, acting as an important check-and-balance on contractor work. Owner's engineer costs are based on an estimated 6-10% of the total cost of each CRI we anticipate will require these services; this is consistent with PIIC's past experience in using owner's engineer consultants for projects of similar scope and size.
- *Design-Build Contractors* - Contractors designing and building relevant CRIs will likely accrue design/installation costs outside of traditional construction costs. Costs are based on preliminary designs developed by energy engineers and contractors hired by PIIC.
- *Grants Management Consultants* - Consultants will assist PIIC in administering this federal grant in compliance with EPA requirements, and developing and facilitating best policies and practices to do so. Costs are a rough estimate based on PIIC past experience (\$150/hour) with similar consultants and the level of effort we expect may be necessary based on our current understanding of EPA requirements (1000 hours).

Construction

Construction is specific to each relevant CRI. Construction costs are based on preliminary designs developed by energy engineers and contractors hired by PIIC.

Indirect Cost Rate

PIIC's indirect cost rate is 18.8% for one proposed PIIC staff person (FTE).

Other Cost

PIIC has included a funding request for Workforce Development (CRI #9), which will provide job positions to PIIC tribal members and their families that support the CRIs. Costs are based on the equivalent of \$35/hour (based on hourly rates for recent similar work positions at PIIC) for 2.5 full-time equivalent positions for 1 year or 5 part-time equivalent positions for 1 year. Workforce position (salary) costs would be paid for by PIIC, but hired through consultant/contractor companies.

7.2. Expenditure of Awarded Funds

PIIC's approach to managing grant funds is rooted in transparency, accountability, and strategic planning. This involves:

- Detailed project planning and budgeting to ensure funds are allocated effectively across all measures.
- Establishing clear timelines and milestones for project completion to guide the expenditure of funds.
- Continuous monitoring and evaluation to adjust plans as necessary and ensure alignment with grant objectives.

Procedures

- *Budget Allocation and Approval:* All grant funds are allocated based on detailed line-item budgets that outline the costs associated with each measure. These budgets are reviewed and approved by PIIC's finance committee and the grantor

agency to ensure alignment with grant objectives and compliance with allowable costs.

- *Financial Oversight:* PIIC will assign a project manager (Andrea Zimmerman) and a financial manager in the Accounting Department for each grant-funded project. The project manager is responsible for the overall management and execution of the project, while the financial manager oversees the budget, ensures accurate and timely accounting of expenditures, and monitors compliance with grant financial regulations.
- *Procurement and Contracting:* PIIC follows strict procurement policies that comply with federal and tribal regulations. This includes competitive bidding for goods and services, evaluating bids based on cost and quality, and contracting with vendors who demonstrate the ability to deliver high-quality products and services within the project's timelines.
- *Financial Management:* The financial manager will keep detailed records of all transactions, including receipts, invoices, and proof of payments. Disbursements are subject to approval by the financial manager, who verifies that expenditures are in line with the approved budget and that progress toward project milestones justifies the release of funds. Documentation will be readily available for audit purposes and to demonstrate compliance with grant conditions.
- *Monitoring and Reporting:* Regular financial and progress reports are prepared and will be submitted to the awarding agency as required. These reports include detailed accounts of expenditures, progress toward project milestones, and any challenges or adjustments to the project plan. PIIC utilizes financial management software to track expenditures in real-time, allowing for accurate and up-to-date reporting.
- *Audit and Evaluation:* PIIC conducts internal audits of grant-funded projects to ensure financial integrity and compliance with grant requirements. Additionally, external audits may be conducted by the grantor agency or independent auditors as required. The findings from these audits are used to improve financial management practices and ensure accountability.

Controls

- *Segregation of Duties:* Responsibilities for authorizing expenditures, recording transactions, and managing funds are segregated among different staff members to prevent fraud and errors.
- *Document Retention:* PIIC maintains comprehensive records of all financial transactions related to the grant, including invoices, receipts, contracts, and correspondence. These documents are retained for a specified period as required by the grantor agency and are available for audit or review.
- *Compliance Training:* Staff involved in managing grant funds receive regular training on compliance with federal, state, and tribal regulations, as well as specific requirements of the grantor agency. PIIC will train staff involved in managing federal funds to ensure they understand their responsibilities, the importance of compliance, and the procedures for managing the funds effectively.

Through this structured approach, procedures, and controls, PIIC ensures that awarded grant funds are managed responsibly, expended efficiently, and contribute to the successful completion of projects within the grant period.

7.3. Reasonableness of Costs

Refer to the SF-424 and budget justification spreadsheet for budget details. PIIC's budget request is based on initial scoping and cost estimates prepared by energy engineers and construction managers commissioned by PIIC, based on a robust evaluation of site conditions, development of conceptual designs, and past experience working with PIIC on similar energy upgrade projects. PIIC initial, high-level estimates indicate that we can

accomplish this scope of work within our requested EPA budget. However, energy technology market costs are volatile; therefore, if awarded, PIIC will finalize our concepts, assumptions, and budgets through the planning and procurement phase.