



November 21, 2025

**TO:** The Honorable Chris Wright  
Secretary of Energy  
Department of Energy  
1000 Independence Avenue SW,  
Washington, DC 20585

**RE: Alliance for Tribal Clean Energy Comments on DOE’s “Speed to Power” RFI**

### **Introduction**

The Alliance for Tribal Clean Energy (“Alliance”) respectfully submits these comments in response to the Department of Energy’s Request for Information on “Speed to Power.” The Alliance supports DOE’s efforts to accelerate power infrastructure deployment efficiently; however, such acceleration must not override Tribal sovereignty, diminish environmental protections, or conflict with federal trust and treaty obligations. These obligations, rooted in the U.S. Constitution, ratified treaties, federal statutes, and long-standing administrative precedent, are legally binding and must provide the foundation for DOE’s policy decisions and program design.<sup>1</sup> These standards sit within a long line of authority, which collectively affirm Tribal sovereignty, the federal government’s duty of protection, and Congress’s sole and exclusive role in modifying or extinguishing Tribal rights.<sup>2</sup>

The Alliance has provided no-cost technical assistance, capacity support, grant writing, and policy engagement to more than 150 Tribal Nations pursuing clean energy development across Indian Country. The insights offered in these comments reflect direct experience supporting Tribal governments as they navigate DOE programs, regional planning processes, transmission constraints, and the emerging pressures created by data center expansion and other large-load facilities.

### **Federal Trust Responsibility and DOE Consultation Obligations**

The Alliance respectfully urges the Department of Energy (DOE) to ensure that all “Speed to Power” strategies are grounded in early, meaningful, and Government-to-Government Tribal Consultation consistent with Executive Order 13175, DOE’s Tribal Consultation Policy (2023), and the federal Trust and Treaty responsibilities.<sup>3</sup> Consultation must occur early enough to

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<sup>1</sup>*Seminole Nation v. United States*, 316 U.S. 286, 296–97 (1942).

*United States v. Mitchell*, 463 U.S. 206, 224–26 (1983).

<sup>2</sup>*Cherokee Nation v. Georgia*, 30 U.S. (5 Pet.) 1, 17 (1831); *United States v. Kagama*, 118 U.S. 375, 384–85 (1886); *Worcester v. Georgia*, 31 U.S. (6 Pet.) 515, 561–62 (1832).

<sup>3</sup> Exec. Order No. 13,175, 65 Fed. Reg. 67,249 (Nov. 9, 2000) (requiring agencies to engage in early, meaningful, and Government-to-Government consultation with Tribal Nations on policies with Tribal implications). U.S. Dep’t of Energy, Department of Energy American Indian and Alaska Native Tribal Government Policy (2023) (committing DOE to Government-to-Government consultation and recognition of Tribal sovereignty).

meaningfully shape program design, funding structures, siting approaches, and implementation pathways.

Treaty rights remain in force unless Congress clearly expresses otherwise.<sup>4</sup> These rights must be reasonably interpreted to fulfill their protective purpose.<sup>5</sup> Federal actions, including energy planning, transmission development, and interconnection policies, must be evaluated in light of these treaty and reserved rights. In modern doctrine, the Supreme Court continues to reaffirm the binding force of federal promises to Tribal Nations.<sup>6</sup> Tribal sovereign immunity remains a core aspect of sovereignty,<sup>7</sup> and federal preemption prevents states from interfering with Tribal self-governance or economic development.<sup>8</sup>

Federal agencies must meaningfully consider Tribal concerns when federal actions may affect Tribal lands, cultural resources, treaty rights, or trust assets. Agencies must take a “hard look” under NEPA.<sup>9</sup> They must also evaluate Tribal cultural and environmental impacts, including cumulative effects.<sup>10</sup> NEPA also requires consideration of subsistence and treaty impacts.<sup>11</sup>

Recent circuit-level decisions strengthen these principles. The D.C. Circuit held that agencies must substantively address Tribal objections and cultural resource concerns.<sup>12</sup> Agencies must meaningfully consider Tribal input where trust resources may be affected.<sup>13</sup> Agencies may not disregard Tribal objections in environmental reviews.<sup>14</sup>

DOE must also independently comply with statutory duties and cannot rely on state processes to satisfy federal obligations.<sup>15</sup> Under NEPA, DOE must consider environmental, cultural, and treaty implications of accelerated energy deployment.<sup>16</sup> Under the National Historic Preservation Act (NHPA) § 106, DOE must consult with Tribal Nations to identify, evaluate, and mitigate impacts on Tribal cultural historic resources.<sup>17</sup> Executive Order 13175 requires early, meaningful,

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*Seminole Nation*, 316 U.S. at 296–97.

Indian Self-Determination Act, 25 U.S.C. § 5301(a).

<sup>4</sup> *Menominee Tribe v. United States*, 391 U.S. 404, 412–13 (1968); *Minnesota v. Mille Lacs Band of Chippewa Indians*, 526 U.S. 172, 200 (1999).

<sup>5</sup> *Washington v. Washington State Commercial Passenger Fishing Vessel Ass'n*, 443 U.S. 658, 675–76 (1979).

<sup>6</sup> *McGirt v. Oklahoma*, 140 S. Ct. 2452, 2475–76 (2020).

<sup>7</sup> *Michigan v. Bay Mills Indian Community*, 572 U.S. 782, 788–90 (2014).

<sup>8</sup> *New Mexico v. Mescalero Apache Tribe*, 462 U.S. 324, 334–35 (1983).

<sup>9</sup> *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 350–52 (1989).

<sup>10</sup> *Northern Cheyenne Tribe v. Hodel*, 851 F.2d 1152, 1156–58 (9th Cir. 1988).

<sup>11</sup> *People of the Village of Gambell v. Hodel*, 869 F.2d 1273, 1283–84 (9th Cir. 1989).

<sup>12</sup> *Standing Rock Sioux Tribe v. U.S. Army Corps of Eng'rs*, 985 F.3d 1032, 1048–52 (D.C. Cir. 2021).

<sup>13</sup> *Navajo Nation v. U.S. DOI*, 876 F.3d 1144, 1160–63 (9th Cir. 2017).

<sup>14</sup> *Oglala Sioux Tribe v. NRC*, 896 F.3d 520, 538–39 (D.C. Cir. 2018).

<sup>15</sup> *Cal. Wilderness Coal. v. U.S. Dep't of Energy*, 631 F.3d 1072, 1084–85 (9th Cir. 2011).

<sup>16</sup> National Environmental Policy Act (NEPA), 42 U.S.C. §§ 4321–4370h.

<sup>17</sup> National Historic Preservation Act (NHPA) § 106, 54 U.S.C. § 306108.

Government-to-Government consultation.<sup>18</sup> DOE’s Tribal Consultation Policy (2023) reaffirms this duty and requires DOE to integrate Tribal concerns into program design, funding structures, and implementation processes. The Federal Power Act requires just and reasonable rates and nondiscriminatory access<sup>19</sup> and governs transmission planning and siting.<sup>20</sup> Congress explicitly directs the federal government to support Tribal self-determined energy development.<sup>21</sup>

Transmission development, large-load integration, siting decisions, data center and AI-related load growth, interconnection reforms, and “Speed to Power” implementation all implicate these obligations. DOE must ensure that new program designs do not diminish Tribal jurisdiction or erode treaty-protected rights and resources. DOE must acknowledge the realities of transmission deserts, interconnection bottlenecks, and historical underinvestment that disproportionately affect Tribal Nations pursuing clean energy development.

### **Impact of Large-Load Growth on Tribal Nations**

Large-load growth, including data centers, industrial operations, and expanded Tribal gaming enterprises, creates opportunities for Tribal economic development, and introduces substantial jurisdictional, environmental, and infrastructural risks if not approached in a manner that fully respects Tribal sovereignty. Federal efforts to accelerate interconnection and service for large loads may intensify pressures on transmission capacity, water resources, land use, and treaty-reserved landscapes, areas where chronic underinvestment has long constrained Tribal infrastructure and governance. DOE cannot rely on state, utility, or regional processes as substitutes for federal consultation obligations.<sup>22</sup> These risks are magnified where utilities prioritize major industrial customers over the needs of Tribal communities, potentially violating the Federal Power Act’s prohibition on undue discrimination<sup>23</sup> and undermining federal Trust obligations.<sup>24</sup> DOE must engage early with Tribal Nations to ensure accelerated timelines do not encroach upon Tribal jurisdiction or diminish treaty-protected resources.

Accordingly, DOE must integrate Tribal perspectives at the earliest stages of policy development to ensure that any accelerated or large-load power-delivery mechanisms reinforce, rather than erode, Tribal jurisdiction, treaty-reserved resource protections, and the inherent authority of Tribal Nations to govern energy and land-use decisions within their territories. DOE must also recognize that statutory interpretation principles require ambiguities to be resolved in favor of Tribal Nations.<sup>25</sup> Where programmatic acceleration has the potential to affect treaty-reserved

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<sup>18</sup> Exec. Order No. 13,175, 65 Fed. Reg. 67,249 (Nov. 9, 2000).

<sup>19</sup> 16 U.S.C. §§ 824d–824e.

<sup>20</sup> 16 U.S.C. § 824p.

<sup>21</sup> 25 U.S.C. § 3502(a).

<sup>22</sup> *Cal. Wilderness Coal.*, 631 F.3d at 1084–85.

<sup>23</sup> Federal Power Act §§ 205–206, 16 U.S.C. §§ 824d–824e (prohibits unreasonable preference or undue discrimination in rates and access).

<sup>24</sup> *Seminole Nation*, 316 U.S. at 296–97.

<sup>25</sup> *Montana v. Blackfeet Tribe*, 471 U.S. 759, 766 (1985) (trust-modifying statutes must be explicit and are to be construed liberally in favor of Tribes).

rights, ecological resources, or Tribal regulatory authority, DOE must adopt interpretations that preserve, not diminish, Tribal rights.<sup>26</sup> Further, NEPA requires agencies to meaningfully evaluate environmental and cultural impacts and fully analyze alternatives, including a robust no-action alternative.<sup>27</sup>

### **The Need for a Tribal-Centered Approach**

Achieving this outcome requires a Tribal-centered approach that recognizes Tribal Nations as sovereign governments and market participants with authority over land use, taxation, permitting, environmental regulation, natural resource management, and energy planning. DOE’s “Speed to Power” strategies must treat Tribal sovereignty as foundational, recognizing that federal statutes affirm Tribal self-determination as a core policy. Therefore, DOE must ensure that “Speed to Power” includes essential investments to close longstanding transmission gaps in Indian Country, enable the siting of data centers and clean energy facilities on Tribal lands, and support Tribally led regulatory and economic development priorities. Such an approach aligns with DOE’s trust responsibility and commitments.<sup>28</sup>

### **Systemic Barriers Limiting Tribal Participation**

Despite significant opportunity, systemic barriers continue to prevent Tribal Nations from fully participating in DOE programs.<sup>29</sup> Financing barriers, including limited access to upfront capital, high matching requirements, and unreimbursed early-stage development costs, exclude many otherwise viable Tribal projects.<sup>30</sup> Transmission barriers are even more severe: decades of federal underinvestment have left many Tribal regions with minimal transmission capacity, preventing renewable generation, constraining large-load development, and hampering electrification and broadband deployment.<sup>31</sup> Transmission constraints therefore implicate DOE obligations under the National Historic Preservation Act,<sup>32</sup> requiring Consultation with Tribal Nations to identify, evaluate, and mitigate impacts to cultural and sacred resources affected by federal actions. Procedural barriers, inconsistent consultation practices, and lack of coordination across DOE

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<sup>26</sup>*Menominee Tribe*, 391 U.S. at 412–13.

<sup>27</sup> *Robertson*, 490 U.S. at 350–52.

<sup>28</sup> See *Merrion v. Jicarilla Apache Tribe*, 455 U.S. 130, 137–38 (1982) (affirming Tribes’ inherent authority to control economic development and land use within their territories); Energy Policy Act of 2005, 25 U.S.C. §§ 3501–3502 (directing federal agencies to support Tribal authority over energy planning, siting, and economic development); Indian Self-Determination and Education Assistance Act, 25 U.S.C. § 5301(a) (recognizing the federal policy to promote Tribal self-government and economic self-sufficiency).

<sup>29</sup> See U.S. Gov’t Accountability Office, *Tribal Energy: Opportunities Exist to Overcome Key Barriers to Development*, GAO-19-531 (2019) (finding that Tribal Nations face systemic structural, financial, and technical barriers that limit participation in federal energy programs).

<sup>30</sup> See GAO-19-531, *supra* (identifying limited access to capital, high match requirements, and unreimbursed pre-development costs as major constraints on Tribal energy projects); 25 U.S.C. § 3501(a)(5) (finding that Tribal energy development has been “hampered by a lack of financial resources and insufficient technical capacity”).

<sup>31</sup> See GAO-19-531, *supra* (documenting chronic federal underinvestment in transmission serving Tribal communities); Nat’l Renewable Energy Lab., *Tribal Energy Transmission and Access Study* (2021) (finding that limited transmission capacity significantly restricts Tribal renewable energy development and load growth).

<sup>32</sup> 54 U.S.C. § 306108.

offices reduce project viability.<sup>33</sup> Further, Tribes need early-phase planning resources, technical analysis, interconnection support, and capacity-building funds to meaningfully engage in regional transmission planning and DOE grant opportunities.<sup>34</sup>

### **Additional Legal Considerations**

DOE must construe all ambiguities in federal statutes affecting Tribal Nations in their favor. In *Montana v. Blackfeet Tribe*, the Supreme Court affirmed that trust-modifying statutes must be explicit, and any ambiguity must be resolved liberally in favor of Tribal rights.<sup>35</sup> Where DOE's accelerated timelines or program designs affect treaty-protected resources, ecological assets, or Tribal jurisdiction authority, DOE must adopt interpretations that preserve, rather than diminish, treaty rights.<sup>36</sup>

DOE cannot rely on state, utility, or regional processes as substitutes for independent federal analysis or Consultation obligations. In *Cal. Wilderness Coal. v. U.S. Dep't of Energy*, the Ninth Circuit rejected DOE's reliance on state-led NIETC analysis and required the Department to undertake its own evaluation consistent with federal law and Tribal interests.<sup>37</sup> This principle is directly relevant to "Speed to Power" proposals that contemplate reliance on regional or state processes for large-load deployment.

DOE must also ensure compliance with the NHPA, which requires Consultation with Tribal Nations to identify, evaluate, and mitigate effects on cultural, sacred, or historic resources affected by federal actions. Large-load growth, transmission development, and siting changes triggered by accelerated timelines all implicate NHPA obligations.<sup>38</sup>

NEPA protections extend to Tribal treaty rights and cultural resources. In *Northern Cheyenne Tribe v. Hodel*, the 9th circuit held that agencies must meaningfully evaluate environmental and cultural impacts tied to treaty rights.<sup>39</sup> DOE must ensure that NEPA alternatives and cumulative effects analyses fully account for Tribal priorities when designing accelerated power-delivery mechanisms.

### **Case Study: Oceti Sakowin Power Authority**

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<sup>33</sup> See U.S. Dep't of Energy, Tribal Energy Program: Barriers and Opportunities Report (2017) (finding inconsistent consultation, fragmented DOE processes, and inadequate coordination impede Tribal project success); Exec. Order No. 13,175, 65 Fed. Reg. 67,249 (Nov. 9, 2000) (requiring meaningful, coordinated consultation with Tribal governments).

<sup>34</sup> See DOE, Tribal Energy Program: Barriers and Opportunities Report, *supra* (identifying need for early-phase planning resources, technical analysis, interconnection support, and capacity funding to improve Tribal participation in federal energy programs); 25 U.S.C. § 3502(a) (directing federal agencies to assist Tribes in energy planning, development, and capacity building).

<sup>35</sup> *Montana*, 471 U.S. 759, 766.

<sup>36</sup> *Menominee Tribe*, 391 U.S. at 412–13.

<sup>37</sup> *Cal. Wilderness Coal.*, 631 F.3d at 1084–85.

<sup>38</sup> 54 U.S.C. § 306108.

<sup>39</sup> *Northern Cheyenne*, 851 F.2d at 1156–58.

The experience of the Oceti Sakowin Power Authority (OSPA) and the TRIBES Project in western South Dakota illustrates the scale and interconnected nature of these challenges. OSPA, working in partnership with the Western Area Power Administration (WAPA), Basin Electric Power Cooperative, and the Southwest Power Pool (SPP), is advancing the TRIBES Project to address severe transmission constraints across western South Dakota, a region widely documented as a “transmission desert.”<sup>40</sup> Despite abundant renewable resources, large land bases, and supportive Tribal governments, inadequate transmission capacity prevents Tribal Nations and surrounding rural communities from attracting investment, deploying renewable energy, and supporting data center growth.

OSPA projects substantial load growth associated with the expansion of data centers north and east of Tribal lands. In prior comments to DOE, OSPA has emphasized that Tribal lands are ideal locations for such facilities because they offer large, readily available land areas, on-site clean energy resources, and there is no community-level resistance to siting or permitting the project in that location.<sup>41</sup> Yet the lack of transmission infrastructure undermines these competitive advantages.

### **Case Study: Navajo Nation**

The Navajo Nation, the largest Tribe by land base, is actively developing a new diversified and balanced portfolio of energy generation and transmission projects to support the long-term energy and economic sovereignty of the Navajo Nation. In addition to securing the future of the Navajo Nation, these projects will be crucial in unleashing America’s energy potential, promote American energy dominance, and ensure our national security is in alignment with Administration priorities.<sup>42</sup> One of Navajo Nation’s major projects is to develop the NavEnergy Hub generation in the Four Corners area to serve high demand energy markets and provide high load serving capability to underdeveloped Tribal communities. This initial project will provide a major source of direct and indirect jobs as well as current and future economic value to the Navajo Nation.

NavEnergy Hub’s new generation will be connected to the broader electrical grid through a newly developed local transmission system, the Navajo Transitional Energy Company’s (NTEC) Energy Switching Station (NEPSS), that ties into Four Corners switchyard and other nearby transmission lines. A new 500kV high voltage transmission line is also being developed to run across the northern section of the Navajo Nation,<sup>43</sup> following the alignment of the former proposed Navajo Transmission Project, to access additional existing transmission systems that are connected into high demand areas, but are today underutilized. Additionally, this new high voltage transmission line will provide the Navajo Nation the ability to provide high demand load serving potential to attract manufacturing, new industry, and even data centers to the region.

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<sup>40</sup> Email from Jon Canis, General Counsel, Oceti Sakowin Power Authority, to the author (Oct. 30, 2025).

<sup>41</sup> Email from Canis to author (Oct. 30, 2025).

<sup>42</sup> Navajo Transitional Energy Company. Email interview by author (November 2025).

<sup>43</sup> GridLiance, 2025-2026 Transmission Planning Process Economic Study Request Summary (2025).

For decades, the Navajo Nation’s lands have been used to generate high levels of energy that have fueled the development of major cities off the Navajo Nation.<sup>44</sup> Development of the NavEnergy Hub, including the new high voltage transmission line will, for the first time in decades, create an opportunity for the Navajo Nation to recruit high energy demand opportunities, such as manufacturing, industry, and data centers. These endeavors will create tremendous direct revenue for the Navajo Nation and high paying jobs for individuals living in areas of high poverty and underdevelopment. For more detailed insights into the development on Navajo Nation and the permitting or funding changes they’d like to see implemented, we refer you to their submission to this Request for Information. By highlighting this case study, the Alliance seeks to point DOE in the direction of practitioners of Tribal energy development who can speak to the unique needs of their individual Tribe and region.

The work being done by the Navajo Nation serves as a striking example of the often underappreciated benefits that result from Tribally designed and owned energy infrastructure development. As the DOE seeks to streamline permitting and provide incentives for generation and transmission development, it should pay special attention to assisting Tribal projects. Greater investment into increasing the technical and financial capacity for Tribes will help meet the nation’s accelerating energy demand.

### **Recommendations for DOE Action**

OSPA’s experience highlights the need for integrated federal financing solutions. Grid Resilience and Innovation Partnerships (GRIP) grants remain a critical resource for planning and pre-development, while the Tribal Energy Finance Program (TEFP), otherwise known as the Tribal Energy Loan Guarantee Program (TELGP) represent substantial but underutilized tools for supporting Tribal transmission and large-load development. Coordination between these programs is essential for enabling Tribes to advance major regional infrastructure projects. OSPA and regional partners have highlighted this need in congressional testimony, including the September 10, 2025 Senate Indian Affairs Committee hearing on Tribal energy infrastructure.<sup>45</sup> Tribal Nations and policy and development organizations alike have been contemplating how the TEFP’s guidelines and requirements can be revised to be more congruent with how Tribes are situated as developers. We recommend that DOE provide a forum for those suggestions to be heard, so that common sense solutions can be implemented. If DOE attempts to rewrite this or any other program without Tribal input, they run the risk of incentivization programs going under-subscribed. A clear example of this was how the TEFP deterred applicants by restricting their ability to engage in certain economic activities if they received a loan guarantee. Only early and often consultation with Tribal Nations can fix such issues.

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<sup>44</sup> Bazilian, Cardenas, Chattopadhyay, Luarkie, Ziv, *Electricity Access in the Navajo Nation*, Colorado School of Mines, October 10, 2024.

<sup>45</sup> U.S. Senate Committee on Indian Affairs, *Oversight Hearing: “Unleashing Indian Energy—Examining Federal Programs at the U.S. Department of Energy,”* 119th Cong., 1st sess., September 10, 2025.

DOE should coordinate federal programs to support major Tribal infrastructure needs, including acknowledging the strategic importance of Tribally led National Interest Electric Transmission Corridor (NIETC) designations, such as the proposed Tribal Energy Access NIETC. A Tribally led designation provides an easily identifiable route for transmission development across Tribal lands, establishes community and governmental support, and unlocks the full range of Transmission Facilitation Program authorities for transmission owners engaged in Tribally approved projects.<sup>46</sup> Reviving the DOE Transmission Acceleration Grant Program, specifically with a Tribal set-aside, would further expedite siting, permitting, and right-of-way coordination in Indian Country. In addition, DOE should establish a special consideration for Tribal sovereign load by allowing these projects to qualify for expedited treatment even when they are not curtailable. Tribal sovereign load represents a distinct project type with different operational realities, and when such projects serve essential community functions, they should not be required or expected to dispatch. A separate Tribal track, untethered from curtailment requirements, is necessary to ensure that community-serving, sovereign-load projects can access reasonable and timely loan approvals.

Moreover, standard Regional Transmission Operator (RTO) planning models do not account for modern transmission technologies, including carbon-core conductors and the co-location of fiber optics. Carbon-core conductors offer major long-term benefits for grid reliability and resilience but are often rejected by RTO cost-benefit analyses due to higher initial capital costs. Fiber-optic co-location is essential for supporting data centers, improving broadband access in underserved Tribal regions, and strengthening regional economic development, yet RTO models do not evaluate or credit these benefits.<sup>47</sup> DOE's "Speed to Power" strategy should explicitly prioritize and reward projects that incorporate modern, advanced, and co-located technologies to ensure durable, forward-looking infrastructure.

Finally, DOE must recognize the realistic timelines required for major transmission development. Even with acceleration, permitting, environmental review, engineering, interconnection studies, and construction often require five or more years. Federal programs must therefore support, rather than outpace, real-world development timelines.<sup>48</sup> This includes

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<sup>46</sup> Federal Power Act § 216, 16 U.S.C. § 824p (establishing federal authority for National Interest Electric Transmission Corridor designations); Infrastructure Investment and Jobs Act, Pub. L. No. 117-58, § 40106, 135 Stat. 429 (2021) (modernizing NIETC designation processes and directing consideration of Tribal interests); Infrastructure Investment and Jobs Act, Pub. L. No. 117-58, § 40107, 135 Stat. 429 (2021) (establishing the Transmission Facilitation Program and authorizing federal support for eligible transmission projects).

<sup>47</sup> American Council on Renewable Energy (ACORE), *Advanced Conductors on Existing Transmission Corridors to Accelerate Low-Cost Decarbonization* (March 2022), 6, 22–24 (noting that advanced conductors face "higher upfront cost).

<sup>48</sup> U.S. Department of Energy, *National Transmission Needs Study* (Washington, D.C.: DOE, 2023), 45–47 (finding that permitting, environmental review, engineering, interconnection, and construction routinely require five to ten years for major transmission projects); U.S. Gov't Accountability Office, *Electricity Transmission: FERC and DOE Should Take Additional Actions to Address Transmission Challenges*, GAO-22-105112 (Washington, D.C.: GAO, 2022), 18–20 (describing multi-year permitting and development timelines for high-voltage transmission projects); Federal Energy Regulatory Commission, *Transmission Planning and Cost Allocation*, Docket No. AD22-8-000

acknowledging that Tribes must develop the generation resources available to them, whether renewable, firm, or hybrid, consistent with congressional statements and DOE testimony acknowledging that all forms of generation will be needed to meet emerging load requirements.<sup>49</sup>

### **Conclusion**

A Tribal-centered approach is essential to meeting national energy goals, enhancing grid reliability, and upholding federal treaty and trust obligations. The Alliance respectfully urges DOE to integrate a Tribal-centered approach across all components of the “Speed to Power” initiative. Doing so will strengthen grid reliability, support data center and AI-scale load growth, advance federal energy goals, and fulfill the United States’ trust and treaty obligations. Tribal Nations are ready partners in achieving these objectives, but DOE must ensure that “speed to power” does not become “speed past Tribes.” Instead, it should be the foundation for fair, sovereign-driven, and community-aligned energy transformation.

The Alliance appreciates the opportunity to comment and looks forward to continued partnership with DOE in shaping a modern, reliable, and Tribal-inclusive energy future.

Sincerely,



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(2022) (noting that interconnection queues and engineering studies alone often extend project timelines by multiple years).

<sup>49</sup> U.S. Senate Committee on Indian Affairs, *Oversight Hearing: “Unleashing Indian Energy—Examining Federal Programs at the U.S. Department of Energy,”* 119th Cong., 1st sess., September 10, 2025 (statement of Sen. Lisa Murkowski) (“whether through non-renewable or renewable sources”).