

DOCKETED

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Additional submitted attachment is included below.

18 August 2022

Relevant questions to the CEC regarding the CERI Program in response to DOE DE-FOA-0002736, BIL Preventing Outages & Enhancing the Resilience of the Electric Grid

1. We understand that many questions have been submitted to the DOE surrounding eligibility, and that DOE is working through the process in which the Secretary may determine any other relevant entity from being designated as an eligible entity pursuant to Section 40101(a)(2)(G) of the IJJA. However, to support the CEC's new CERI Program, would the CEC consider expanding eligible subawardee entities to nonprofit organizations, cities, counties, judicial court branches of the State, community-based organizations (who also may be a nonprofit), national laboratories, and ISO?
2. Would a Community Choice Aggregator (CCA) qualify as an eligible Lead Applicant/Prime?
3. As per the FAQ under DE-FOA-0002736 funding opportunity, Indian Tribes are only required to provide 15% Match with no further Match requirements. However, States are still required to provide 15% Match and all eligible entities receiving a subaward must provide 100% Match of their subaward. Imposing a 100% Match on all subawardees can be a deal breaker especially to nonprofits and small businesses who may be key partners to the Prime's and the project. Since it is the PV solar system that is the bulk of the project's expenses, to help mitigate this steep cost exposure – would the CEC consider utilizing the PV solar system installation to meet the Match requirement?
4. As we know, front-of-the meter (FOM) solar+storage and microgrid projects continue to experience challenges with being able to move forward to interconnection and operation. Hence, does the CEC envision the CERI Program funding opportunities to be focused on behind-the-meter (BTM) projects and/or front-of-the-meter (FOM) projects?
5. Would a Community Microgrid approach be an eligible project?
6. Will the CEC's CERI Program consider affordable housing developments and transitional housing that allow temporary housing for the homeless while seeking a more permanent housing facility as eligible project site locations since these housing solutions serve disadvantaged/underserved/low-income communities?
7. Funding restrictions: do project management activities fall under administrative and/or technical assistance activities, thus would be included in the 5% allocation of grant funds?
8. When does the CEC anticipate releasing the first CERI Program GFO in support of its application under the DOE's formula grants solicitation DE-FOA-0002736?