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Suggested Changes for Tier II Projects

Below are three suggested changes that broaden the scope of the grant to better include software based projects:

1. The Eligibility Requirements require that an applicant be the specific facility that is installing the project. We believe there are cases, especially for Tier II projects, where a technology company should be allowed to directly apply. For example, for a software solution that has a per facility cost below the minimum award size of \$2 million, the most practical way to organize a project could be to combine the deployments at multiple facilities operated by multiple food processors. In this scenario the technology company should be able to apply on behalf of the multiple participating facilities. The technology company could be required to submit letters of commitment from multiple facilities, e.g. two or three. The deployment sites should be allowed to change if circumstances change between the time the application is prepared and the time a project is carried out. We recommend that the guidelines allow for this scenario.

2. Section II.A describes requirements for determining a baseline and would require submitting the baseline with the application. We're concerned that developing more than a very rough baseline at the application stage is difficult and could be costly. It could be especially challenging for a software technology that impacts multiple systems. This preliminary baseline might also not be appropriate for comparison to a post-project measurement. We recommend requiring that a more rigorous baseline be determined by an awardee after a project begins as part of the project evaluation

3. In a number of places the Draft Guidelines refer to "equipment" or an "equipment retrofit project", such as in the "Eligibility Requirements". The focus on "equipment" could be interpreted as excluding software, metering and controls. The establishing legislation, AB 109 (Ting), doesn't appear to include this limitation but instead refers more broadly to "projects that reduce greenhouse gas emissions". We request that the Commission explicitly broaden the scope to include software, metering and controls. It should be incumbent on an applicant proposing a software, metering or control project to demonstrate that the project would reduce greenhouse gas emissions.