



## **ENERGY EFFICIENCY & CONSERVATION SUBGRANTS TO NON-ENTITLEMENT CITIES AND COUNTIES**

### **FAQ – UPDATED FEBRUARY 5, 2010**

#### **1. What is the history of EECBG Program? Will the EECBG program continue?**

The Energy Efficiency and Conservation Block Grant (EECBG) program was created in 2007 with the passage of the Energy Investment and Securities Act (EISA). The program was created to provide states, counties and units of local government with grant funds to reduce fossil fuel emissions, reduce total energy use, and improve energy efficiency in appropriate sectors including buildings and transportation. Although EISA proposed to appropriate \$2 billion per year to the EECBG program through 2012, the program recently received its first funding allocation through the American Recovery and Reinvestment Act (ARRA). It is unknown if the EECBG program will receive future appropriations.

#### **2. Who is eligible to apply for EECBG funding through the FECC?**

Cities and counties that did not receive direct formula funding from the US Department of Energy are eligible to receive EECBG funding issued through the FECC. Units of Local Government are defined as follows:

1. The government is in the latest available Census of Governments as a currently incorporated government;
2. The government has a governance structure with an elected official and governing body; and
3. The government has the authority to implement the eligible activities under this program.

#### **3. Can school districts apply?**

School districts are not eligible for EECBG funds from the FECC. However school district projects/ programs are able to apply for funding through one of the municipalities or counties served by the school district.

#### **4. Can businesses and nonprofits apply on behalf of an eligible city or county?**

No, businesses and nonprofits are not eligible to apply for EECBG funding.

#### **5. What will be the reporting requirements to receive EECBG funds?**

There will be an unprecedented level of transparency and accountability for projects or programs funded under ARRA. The reporting requirements will be extensive and include documentation of compliance with the Davis Bacon Act, the Buy-American provisions, and provide a list of their top five compensated officers in the previous fiscal year. Due to the extensive reporting requirements, a municipality or county may want to consider the amount of time and resources they are able to devote to projects and programs seeking EECBG funding. More information will be provided about the reporting requirements as the programs are developed.

#### **6. What is the Davis Bacon Act and where can I learn more about it?**

The Davis Bacon Act sets wage requirements for contractors and subcontractors who are working on public building improvements funded under ARRA. The requirements are based upon prevailing industry wage rates and are intended to ensure that workers receive fair pay. The US Department of Labor has many resources available on their [Web site](#).

#### **7. Are there exceptions/exemptions to the Buy American provision?**

The following language is pulled directly from the ARRA text, page 189.

##### **SEC. 1605. USE OF AMERICAN IRON, STEEL, AND MANUFACTURED GOODS.**

(a) None of the funds appropriated or otherwise made available by this Act may be used for a project for the construction, alteration, maintenance, or repair of a public building or public work unless all of the iron, steel, and manufactured goods used in the project are produced in the United States.

(b) Subsection (a) shall not apply in any case or category of cases in which the head of the Federal department or agency involved finds that -

- (1) applying subsection (a) would be inconsistent with the public interest;
- (2) iron, steel, and the relevant manufactured goods are not produced in the United States in sufficient and reasonably available quantities and of a satisfactory quality; or
- (3) inclusion of iron, steel, and manufactured goods produced in the United States will increase the cost of the overall project by more than 25 percent.

(c) If the head of a Federal department or agency determines that it is necessary to waive the application of subsection (a) based on a finding under subsection (b), the head of the department or agency shall publish in the Federal Register a detailed written justification as to why the provision is being waived.

(d) This section shall be applied in a manner consistent with United States obligations under international agreements.

#### **8. Can EECSBG funds be used for new construction?**

No, DOE has suggested that the most appropriate use of EECSBG funds for new construction would be for the incremental costs of making the building more energy efficient.

#### **9. What does the FECC consider an eligible activity?**

Only projects and activities that DOE has determined will be excluded from NEPA review through a Categorical Exclusion (CE or sometimes CX) will be deemed eligible projects by the FECC under this solicitation. Categorical Exclusion means a category of actions for which neither an Environmental Assessment (EA) nor an Environmental Impact Statement (EIS) is normally required. Final determination must be made by a DOE NEPA Compliance Officer upon review of the Environmental Questionnaire. Please see Section 4A in the grant solicitation guidelines for a list of categories that DOE has determined can often be categorically excluded.

#### **10. Can eligible cities and counties submit a joint application as a consortium?**

Yes, if eligible jurisdictions choose to partner in their application, the maximum per partner may not exceed 10% (\$1.24 million) of the available grant funds with a total of \$4 million per collaborative application. A lead grantee must be designated in the application. All payments will be made to the lead grantee and under no circumstances shall the FECC make payments or be liable to any partners.

**11. If an eligible city or county is considered a “small city” or “small county” under Category 2 can they apply under Category 1?**

Yes, however only one application may be submitted by an eligible city or county.

**12. What activities are eligible under this grant solicitation?**

Only projects and activities that DOE has determined will be excluded from NEPA review through Categorical Exclusion will be deemed eligible projects by the FECC under this solicitation. DOE determined that the above mentioned activities often are considered categorically excluded from further NEPA review. Therefore, the above mentioned activities should be eligible after final eligibility determination by the DOE NEPA Compliance Officer.

**13. Where can more information be found on Regional Planning Councils in the State of Florida?**

<http://www.ncfrpc.org/state.html>

**14. Is a solar energy feasibility study project to determine the feasibility of installing solar panels on existing city property/buildings/roofs considered eligible under this grant solicitation?**

Yes.

**15. How does a city or county determine if they are an entitlement community?**

For a list of Florida’s entitlement cities and counties and their allocations, please visit <http://www.eecbg.energy.gov/States/FL.xls>.

**16. How can I fill out the application in PDF form?**

Attachment A is provided on the website in a Microsoft Word version.

**17. Will geography be considered in the final scoring?**

No, geography is not a scoring criterion. Please refer to 6C of the Grant Guidelines.

**18. Would it be possible for two applications from the same region to be funded (if ranked high enough), or would the need to spread out the money throughout the state likely necessitate the choosing of only one project from our region?**

Yes. If the applications score within the fundable range, both would receive awards.

**19. Where the application asks for a “FEID No” on the first page, does it mean a FEIN?**

Yes, the FEID No. and FEIN both refer to the Federal Tax Identification Number.

**20. What projects will have a greatest chance for an award?**

The FECC must remain impartial. The FECC independent evaluators will evaluate projects based on the criteria outlined in 6C of the Grant Guidelines.

**21. Can a city or county use a consulting service to aid in the application process?**

Yes, however this solicitation does not allow pre-award costs. This means the FECC will not reimburse a city or county's costs associated with the development of the application.

**22. Must a city or county use a Request for Proposal process for consulting services?**

If a city or county decides to use a consultant to aid in the administration of a grant, the city or county must follow the procurement procedures outlined in 10 CFR 600.

**23. Will multiple activities be accepted in one application?**

Yes, however only eligible activities will we considered.

**24. How should an applicant submit multiple activities in a single application?**

Applicants submitting multiple activities in one application will be limited to the page limits as described in the application for the project narrative. However, applications may submit a separate budget for each activity.

**25. What is a sub-grantee?**

A sub-grantee is an entity awarded a sub-grant by the grantee. A sub-grantee is accountable to the grantee for the use of the funds provided.

**26. Will funding be awarded on a cost reimbursable basis or in advance payments?**

Payment will be issued on a cost reimbursement basis. However, under state statute grantees are eligible for a three month operating cost advance.

**27. Can natural gas transmission lines be funded by the grant?**

Only if the project is considered categorically excluded from NEPA review.

**28. What is the maximum amount for an application under Category 2 with multiple partners?**

The maximum is \$250,000 per partner. If there are 3 partners, the maximum would be \$750,000.

**29. Will applicants that are asked to present to the FECC be required to travel to the meeting?**

No. If applicants choose not to travel they may make their presentation telephonically.

**30. What is the maximum amount of a rebate to be used to offset costs for solar hot water heaters in residential homes?**

These guidelines do set restrictions on the maximum allowable dollar amount for rebate programs.

**31. What is MFMP?**

MyFlorida Market Place. MyFloridaMarketPlace is the State Florida's online exchange for buyers and vendors. [http://dms.myflorida.com/business\\_operations/state\\_purchasing/myflorida\\_marketplace](http://dms.myflorida.com/business_operations/state_purchasing/myflorida_marketplace)

**32. Where is the metrics calculator located on the FECC website that applicants must to determine the impact of each proposed program?**

[http://myfloridaclimate.com/climate\\_quick\\_links/florida\\_energy\\_climate\\_commission/available\\_funding\\_opportunities/eecbg\\_subgrants\\_to\\_non\\_entitlement\\_cities\\_and\\_counties](http://myfloridaclimate.com/climate_quick_links/florida_energy_climate_commission/available_funding_opportunities/eecbg_subgrants_to_non_entitlement_cities_and_counties)

**33. If an applicant proposes a study, should the applicant calculate the estimation of energy saved or produced and greenhouse gas reduction as a result implementing a study's recommendations?**

The applicant may use the estimation of energy saved or produced and greenhouse gas reduction only if the applicant includes implementation as part of the project.

**34. Will the FECC have any webinars?**

No webinars are scheduled at this time.

**35. Would a lighting project that uses neither solar nor LED lights, but will double efficiency by the way the lighting is directed, controlled and reflected be an eligible activity?**

If the lighting technology used has equal or greater energy efficiency than LED lights.

**36. Are solar pool heaters for our community pools an eligible activity?**

Yes.

**37. Is the \$20,000 limit for the development of an Energy Efficiency and Conservation Strategy per applicant within a combined application or for a single combined application?**

Per applicant within a combined application. If there are three partners in one application, the limit would be \$60,000.

**38. Who should sign the application as the certifying official?**

The Chief Elected Official signs as the "certifying official". If anyone other than the Chief Elected Official signs as the "certifying official", a resolution, passed by the local government, authorizing the individual to sign the application must be provided with the application.

**39. What cities and counties are eligible for Category 1?**

Florida cities and counties that did not receive an EECBG direct formula grant from the Department of Energy.

**40. What cities and counties are eligible for Category 2?**

Florida counties with an unincorporated population of less than 50,000 and Florida cities with a population of 15,000 or less.

**41. What documents must be included in the grant application package?**

Applicants must complete the EECBG Application for Non-Entitlement Cities and Counties. The application can be found on pages 17 -27 of the guidelines. If other documents are required to make the application complete, those documents should be submitted with the application.

**42. The federal guidelines limit administrative costs to 10 % of grant funding excluding costs of meeting the reporting requirement under, what role would the grant consultant perform?**

The grantee may choose to hire a consultant to aid in the overall management of the award, but the grantee is responsible for reporting requirements to the FECC. Administrative costs incurred (including consultant fees) for project administration may not exceed 10%.

**43. What type of census documentation is required to demonstrate population threshold requirements?**

Applicants should consult the latest available Census of Governments to insure they are currently an incorporated government. The Office of Demographic and Economic Research site provides population numbers for Florida cities and counties. Their website is: <http://edr.state.fl.us/population.htm> FECC staff will confirm the population during the eligibility review.

**44. While Low Income Weatherization funds cannot be used as leveraging, if training or other administrative programs are in place to expend Low Income Weatherization funds, can those administrative programs also be used for EECBG grant initiatives?**

If the intent is to use Weatherization funds to administer EECBG funds, the answer is no.

**45. If an item is not included in the metrics calculator should applicants select a similar activity within the calculator?**

Applicants may select a similar activity within the calculator or provide their own energy saving and greenhouse gas reduction estimations provided the methodology for obtaining the estimations is included.

**46. How do we account for plug-in electric vehicles in the metrics calculator posted on the FECC web site?**

According to the Department of Energy, applicants should calculate greenhouse gas emission reductions.

**47. Do insulating the walls and roof of a currently uninsulated civic center and installing high efficiency lighting (in lieu of the current incandescent lighting) properly fall within the Retrofits, Commercial category in the metrics calculator posted on the FECC web site?**

Yes.

**48. Is the only way to account for installation of SEER 20+ HVAC equipment with separate external and internal units (to further increase efficiency) under Procurement, Equipment, HVAC in the metrics calculator posted on the FECC web site? The calculator does not appear to differentiate between conventional equipment and that which substantially exceeds the norm.**

See question 45.

**49. If the calculator does not accommodate proposed activities, will incorporating into the application a statement by an authority attesting to the added energy benefits provide evaluators means to properly consider such alternatives?**

See question 45.

**50. Can state certified building official reviews of Commercial, Residential, and Industrial Sector construction plans be considered an "Energy Audit"?**

No.

**51. If an entity applied and received EECBG funds through the U.S. Department of Energy, are they eligible to apply for EECBG funds from the FECC?**

No.

**52. If a city or county proposes a revolving loan fund using a combination of its own funds and \$250,000 in EECBG grant funds, can additional EECBG grant funds (over and above the \$250,000) be used to pay for salary and other operational costs related to managing the revolving loan program?**

Entities may use \$250,000 in EECBG funds to establish a revolving loan program and additional EECBG funds to administer the program.

**53. When will grants be awarded?**

The FECC has 180 days from the date DOE awarded funds to the FECC to execute grant agreements. DOE awarded EECBG funds to the FECC on November 23, 2009, therefore the FECC must execute grant agreements by May 23, 2010.

**54. Are universities considered an eligible applicant?**

No.

**56. Should the jobs creation/retention estimates include jobs created/retained by vendors potentially selected by the applicant?**

Yes. All jobs created or retained should be included.

**57. Who should the applicant include in their application as part of the project team?**

The applicant should include all city or county personnel assigned to the project as well as subcontractors that will work on the project.

**58. Would a Community Redevelopment District or Community Redevelopment Agency be considered a Special Community Designation?**

No.

**59. Is a PV installation considered an eligible activity?**

A Solar Electricity/Photovoltaic installation is considered eligible if appropriately-sized system or unit on existing rooftops and parking shade structures; or a 60 KW system or smaller unit installed on the ground within the boundaries of an existing facility.

**60. Is there a maximum amount a city or county may pay a consultant?**

A city or county may pay a consultation up to \$20,000 of grant funds may be used to develop an Energy Efficiency and Conservation Strategy. A city or county may also use part of the administration costs to pay for a consultant. Please refer to section 4B. Limitations on Eligible Activities/Costs of the EECBG Sub-grants Application for more details.

**61. Are engineering design fees included in administrative costs?**

No, engineering design fees are considered project costs.

**62. What is considered “matching funds”?**

Please refer to section 3E. Other Activity Funds of the EECBG Sub-grants Application.

**63. Can a city or county submit an application to the FECC if they have also submitted an application to the Department of Energy for EECBG Competitive Funds under DE-FOA-0000148?**

Yes.

**64. What number should I put on the Environmental Checklist?**

DE-EE0000800

**65. If a city or county receives Weatherization Funds under EECBG, can they submit an application for a EECBG Sub-grant from the FECC?**

Yes.

**66. May the applicant provide additional pages above the stated page limit for clarification or elaborate upon information provided in the Project Narrative Sections B, C, D, and E?**

No.

**67. The project budget requires the applicant to specify vendors on section 6 (“Contractual Services”). If a city or county does not know the vendor during the application process what should the city or county specify in the “Vendor” field on the project budget?**

If a city or county plans to subgrant any portion of the proposed project, Section 6 Contractual Services of the Budget must be completed. A city or county may indicate that a vendor has not been selected, but must identify the services to be completed with appropriate market rates.

**68. Who should a city or county select to be a project administrator? Can you have more than one administrator?**

This is a decision for the city or county applying. Please remember applications will be scored on the Project Team as described in Section 6C Scoring.

**69. What font is acceptable to use when submitting a proposal?**

No smaller than size 10 font.

**70. Are sewer districts created by a special act of the State eligible for an EECBG Subgrant from the FECC?**

No.

**71. How should a city or county break down the energy audit metrics portion, based on doing an Energy Audit for Facilities and Property (Vehicles, Industrial Equipment, etc.) and the Community (Residences, Businesses, and Government Facilities)?**

For the Energy Audit for Facilities and Property measure DOE recommends breaking it down by the type of facility audited (industrial equipment would be included in the industrial category). If the purpose of auditing vehicles is to gather preliminary information for establishing an AFV program, DOE considers those savings included under the "vehicle pools" activity.

**72. Are the savings in maintenance and operating costs due to the proposed activities in an application excluded from the calculation of energy savings?**

Using the DOE calculator, savings in maintenance and operating costs or not used to calculate energy savings or greenhouse gas reductions.

**73. How should a county or city document their MFMP status?**

Applicants should provide their MFMP status in the application, staff will confirm the status.

**74. If a building is under construction are proposed energy efficient retrofits considered an eligible activity?**

Yes, as long as the EECBG funds would not be used for actual construction - framing, foundation work, etc retrofits would be an eligible activity.

**75. Does the metric calculator produce results for yearly energy savings and greenhouse gas reduction?**

The metrics calculator produces estimates for annual energy savings and carbon emission reductions.

**76. What does the “either/or” note under the Activity Unit of the Metrics Calculator refer to?**

The "either/or" note that appears in the Activity Unit column for Energy Audits refers to the fact that the user can enter either the total square feet of buildings audited or the number of energy audits conducted, and the spreadsheet will calculate the energy savings.

**77. Are EECBG funds used for salary and other operational costs related to managing a revolving loan fund considered grant administrative costs and limited by the 10 percent restriction?**

Yes.

**78. Would a photovoltaic emergency back-up power within an existing facility that is larger than 60 KW be considered an eligible activity?**

No, a photovoltaic system installed on the ground may not be larger than 60KW.

**79. Would an appropriately sized system greater than 60KW installed on the ground within the boundaries of an existing facility be considered and an eligible activity?**

No, a photovoltaic system installed on the ground may not be larger than 60KW.

**80. Can the installation of multiple photovoltaic systems for one building that are installed on the ground be submitted under one application?**

Only if the combined KW is not larger than 60KW.

**81. Why is there a limit on photovoltaic systems?**

The FECC is following DOE guidance for activities that may be categorically excluded from NEPA.

**82. How will the FECC calculate the administrative costs using the budget breakdown provided in the application?**

Administrative costs are the allowable, reasonable, and allocable direct and indirect costs related to overall management of the awarded grant. To determine the administrative costs for an application the following categories under the budget detail will be added salaries, fringe benefits, and travel along with consulting fees including salaries, fringe benefits, and travel listed under the contractual services category of the budget.

**83. What are direct costs versus indirect costs?**

The FECC prefers that Indirect Costs, if required, are utilized as match. If Indirect Costs are requested to be reimbursed with grant funds, they must be authorized and based on a specified rate in consultation with the Commission. The Indirect Cost Rate and the direct costs upon which the amount of Indirect Cost is calculated must be reasonable, measurable, documented and the Indirect Cost Rate must be consistently applied.

The below definitions for direct and indirect costs were taken from OMB Circular A-87 (Revised 5/10/04)

### **Direct Costs**

1. General. Direct costs are those that can be identified specifically with a particular final cost objective.
2. Application. Typical direct costs chargeable to Federal awards are:
  - a. Compensation of employees for the time devoted and identified specifically to the performance of those awards.
  - b. Cost of materials acquired, consumed, or expended specifically for the purpose of those awards.
  - c. Equipment and other approved capital expenditures.
  - d. Travel expenses incurred specifically to carry out the award.
3. Minor items. Any direct cost of a minor amount may be treated as an indirect cost for reasons of practicality where such accounting treatment for that item of cost is consistently applied to all cost objectives.

### **Indirect Costs**

1. General. Indirect costs are those: (a) incurred for a common or joint purpose benefiting more than one cost objective, and (b) not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved. The term "indirect costs," as used herein, applies to costs of this type originating in the grantee department, as well as those incurred by other departments in supplying goods, services, and facilities. To facilitate equitable distribution of indirect expenses to the cost objectives served, it may be necessary to establish a number of pools of indirect costs within a governmental unit department or in other agencies providing services to a governmental unit department. Indirect cost pools should be distributed to benefitted cost objectives on bases that will produce an equitable result in consideration of relative benefits derived.
2. Cost allocation plans and indirect cost proposals. Requirements for development and submission of cost allocation plans and indirect cost rate proposals are contained in Attachments C, D, and E.
3. Limitation on indirect or administrative costs.
  - a. In addition to restrictions contained in this Circular, there may be laws that further limit the amount of administrative or indirect cost allowed.
  - b. Amounts not recoverable as indirect costs or administrative costs under one Federal award may not be shifted to another Federal award, unless specifically authorized by Federal legislation or regulation.

**84. Under the Energy Savings and Energy Production breakdown on page 18 of the application, does the FECC want the 10 year total for each subcategory (i.e., energy production saved, total energy production, total cost savings, ect.)?**

No, the applicant should provide an estimate of the average annual energy saved and produced as well as greenhouse gas reduction per dollar of EECSBG funds invested from January 2011 to December 2020.

**85. Should matching funds be used as part of the total program funds when calculating energy savings or greenhouse gas reduction?**

No, only requested EECSBG funds should be used for calculation of energy savings and greenhouse gas reduction.

**86. The SEP calculator shows both MWH savings and Natural Gas Savings. What should a city or county provide for natural gas savings in the application, if the proposed project does not utilize natural gas?**

If information such as natural gas savings is not applicable to the project, the city or county is not required to provide that information.

**87. How should a city or county estimate the project cost for Industrial/Commercial energy audits if it is unknown how many and how large the audits will be?**

A city or county may estimate the square footage of audits to be performed by dividing the amount of requested EECSBG funds by the square footage cost of the audit. For example, if the city or county designates \$100,000.00 for energy audits and the auditor will charge \$0.10 per square foot, the city or county can estimate a 1,000,000 square feet of audits.

**88. Is there an available Microsoft Word version of Attachment B (Environmental Check list)?**

No, the FECC only has a PDF version.

**89. Does procurement of street lights on the SEP calculator refer to more efficient lights or solar lights?**

Under the SEP calculator procurement of street lights refers to both efficient lights and solar lights.

**90. Are occupancy controls for vending machines and glass door coolers considered an eligible activity?**

No.

**91. Under which Budget Category will funds for construction need to be placed?**

Please refer to questions 8 and 74 in the FAQ.

**92. Can a municipality anticipate jobs created by dividing the total amount requested by the \$92,000?**

No, applicants must estimate the total short-term and long term jobs and provide justification of all job creation/retention estimates. Please refer to section 6C Scoring of the application.

**93. Can the time a city or county employee spends on a project be considered match?**

Yes, however documentation of funding must be included in the application by a signed letter of commitment from the organization providing the matching funds, with detail for the matching funds. Funds committed as leverage must be documented to the same standards as federal funds and will require submission of source documentation such as invoices, canceled checks, bank statements, etc. when reporting to the FECC.

**94. Can an applicant be awarded leveraged/matching fund points if it estimates future leveraged funds through a proposed program?**

No, matching funds must be actual dollars committed with documentation of funding must be included in the application by a signed letter of commitment from the organization providing the matching funds, with detail for the matching funds.

**95. Can a city or county use the number of jobs created or retained by a potential vendor?**

See question 56.

**96. Can jobs created or retained using matching be used to calculate the job score?**

For scoring purposes, jobs created or retained with matching funds will not be calculated. Please refer to section 6C of the application for more details on scoring.

**97. Can a city or county use the dollar value of energy audit services provided to a household that ultimately makes an application to and receives weatherization program assistance as a low-income household as match?**

No, use of funds for low-income weatherization is not allowed because there is a separate funding program under the Recovery Act for those activities.

**98. Regarding the SEP calculator, which sector should a city use for the “Retrofit” activity since there is not a sector for local government? The current sectors listed are commercial, education, hospital, industrial, and state government.**

Please use state government.

**99. Regarding the SEP calculator, can an applicant input data for multiple activities for the same project?**

Yes, if the data is relevant.

**100. Should the applicant enter the total energy savings and greenhouse gas reductions for the life of the project or just for the first year? The SEP metrics calculator estimates annual savings, however, the proposed project has a life much longer than one year.**

See question 84.

**101. Should the total cost savings include savings in maintenance and operating costs that are not included using the SEP metrics calculator?**

No, the SEP calculator considers maintenance and operating costs in the total cost savings.

**102. Are diesel generators considered an eligible activity?**

No.

**103. Is computer power management software considered an eligible activity?**

No, however where appropriate computer power management software could be used to help implement one of the eligible activities.

**104. When should a city or county submit the Environmental Checklist?**

The Environmental Checklist should be submitted to the FECC as part of the application.

**105. If a vendor were to provide a product or service at a discounted price, could the difference between the market price and the discounted price be counted as a match or leveraged fund?**

No.