

SRC Digital Insurance Services

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September 25, 2022

Patricia Hoffman
Grid Deployment Office
U.S. Department of Energy
1000 Independence Avenue
SW, Washington, DC 20585

RE: FOA Number DE-FOA-0002736
Non-traditional grant request
Formula Grants to States and Indian Tribes for Preventing Outages and Enhancing the
Resilience of the Electric Grid

Ms. Hoffman,

The DOE Orange Button initiative brought together over 300 collaborators to bring greater efficiency to infrastructure construction by starting the process of establishing data interoperability for enabling a digital ecosystem based on open standards.

In the spirit of our long-standing collaboration with the DOE we offer this non-traditional grant request to continue the dialogue towards meeting identified objectives through continued public/private collaborations. Accelerating the implementation of digital construction management systems depends on data interoperability. Meeting the administrative demand created by the IJJA and IRA to build a significant number DER's to provide resiliency requires a digital ecosystem. This non-traditional grant request meets objectives of the FOA, IJJA, IRA and can comply with requirements.

Acknowledging this non-traditional approach may not be qualified under the grant program pending DOE review to determine interest. The collaboration is not representing a State or Indian Tribe but would have a State agency if the DOE expressed interest. In the meantime, the FOA does recognize "any other relevant entity, as determined by the Secretary of DOE" and "robust engagement and collaboration with States and Indian Tribes, as well as with other interested stakeholders, including industry, unions, and local communities, for successful implementation of this Program¹".

As our June 1st response to the DOE RFI reflects, this collaboration covers many aspects and involves many public and private stakeholders over an extended period. Our recommendations seek a funding outcome that services the public benefit with no preference or exclusivity to promote competition and innovation, which is contrary to a single applicant for a limited commercial purpose.

¹ DE-FOA 0002736 Page 7 & 8 Preventing Outages and Enhancing the Resilience of the Electric Grid Formula Grants to States and Indian Tribes

Accordingly, this grant funding request is not a traditional application from a single applicant with a narrowly focused objective and detailed budget. Instead, this non-traditional grant request is an invitation for the DOE to continue its financial support and leadership in multiple areas with multiple stakeholders as would be required for the June 1st recommendations.

If consideration can be given there is an extensive history and future collaboration ready to continue working with the DOE to accelerate the implementation of advanced digital construction systems enabled by data interoperability as called for in the IJA and IRA.

Each of June 1st recommendations represent an interrelated component in the holistic approach across various stakeholders. Each have different individual objectives and would necessitate interest expressed by the DOE and a State and/or Tribe to warrant both the time and expense to develop a traditional application and to know which stakeholders need to be engaged.

Expressed DOE interest would also enable discussions to define the scope desired by the DOE, and the engagement of States and Indian Tribes as potential primary grantees.

If there is interest by the DOE a traditional application can be completed to comply with grant requirements and defined scope.

Grant Request – June 1st Recommendation #2

Provide \$2,000,000 in funding to continue the work of the Orange Button initiative to expand Orange Button XBRL and Orange Button JSON to include the data elements identified in 2a to 2e

Grant Request – June 1st Recommendation #4

[Model Digital Ecosystem for Community Resiliency](#)

This grant option continues the tradition of a collaborative public/private effort for a public benefit. The collaboration group will utilize the project to develop and implement a model grant for local governments to develop community “*energy resilience plans and expedite permit review of distributed energy resources by local governments*” as outlined in [California SB-833 Community Energy Resilience Act of 2022](#), with transparency for project funds as required by [AB1223](#) and enabled by the DOE Orange Button/XBRL and SolarAPP.

The proposed model utilizes the old 2015 public report from Kyoto prepared for the City of Novato. Using the still relevant data we can demonstrate how Novato school campuses can be equipped with solar and storage as critical community facilities for resiliency in the event of power outages, with 40 miles of underground micro-grid infrastructure tunnels for additional resiliency, bi-directional power from homes and businesses, and a fleet of electric vehicles and buses with batteries that add even more resiliency.

Preliminary Budget and use of funds:

\$10,000,000	Installing solar and battery storage on all 17 campuses for the City of Novato and the Novato Unified School District
\$12,000,000	Underground infrastructure tunnel for 40-mile network of 2.5-meter diameter tunnels for a community wide microgrid.
\$ 3,000,000	Electric School Bus Fleet
<u>\$ 5,000,000</u>	Host city and school district for administrative costs.
\$30,000,000	

The estimates are provided by companies willing and able to do the work as a collective and transparent undertaking for the public benefit a digital ecosystem would provide everyone.

As noted earlier, the time and expense to prepare the traditional detailed information for applying for grant funding to expand taxonomies and implement the model digital ecosystem for community resiliency is extensive and not warranted without interest and direction from DOE.

Should there be interest in pursuing the recommendations offered in the June 1st response, the resulting discussion and collaboration will result in traditional funding that does meet grant criteria and will accelerate the implementation of advanced digital construction systems.

In closing we appreciate the work of the DOE in administering grants to achieve the most beneficial results for the public and recognize this non-traditional approach may not fit within the constraints of the structured grant program -- but may fit elsewhere.

We look forward to contributing to a successful model.

Sincerely



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