

ENERGY COMPLIANCE, INC. | *Field Reference for Federal Energy Funding*



GRANT FUNDING SERIES · FEDERAL ENERGY
AWARDS · EC-WP-900

Energy Grant Readiness Checklist

*A 47-point pre-application diagnostic for energy projects
pursuing federal, state, and utility funding.*

Forty-seven items across five readiness axes, each scored Ready, Partial, or Not Ready, with a 30/60/90 action for every gap. Updated to the Uniform Guidance, Buy America, prevailing wage, and federal policy changes in effect in October 2026.

Energy Compliance, Inc. Professional Reference

energycomplianceinc.com

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Disclaimer & Legal Notice

This publication is the work product of Energy Compliance, Inc. It is a structured pre-application diagnostic for entities pursuing federal, state, and utility energy funding. It is provided for general information only. It is not legal advice, tax advice, or an opinion on award eligibility. Engage qualified counsel, accounting professionals, and the program office for determinations specific to your circumstances. Energy Compliance, Inc. supplies advisory and documentation services. Funding agencies make award decisions under program-specific criteria outside our control.

The regulatory citations in this edition were checked against the electronic Code of Federal Regulations as current through October 15, 2026, and against the other primary sources listed in Sources and Authorities. 2 CFR Part 200 was last revised by OMB's 2024 Uniform Guidance rule, effective October 1, 2024. OMB published a proposed rewrite of the Uniform Guidance on May 29, 2026. As of this edition it has not been issued as a final rule. Program parameters change. Confirm the current regulation, the active Notice of Funding Opportunity (NOFO), and current agency policy before you apply.

Foreword

I've spent more than thirty years inside the regulatory and operational side of the energy sector: running control centers, sitting on the auditor side of compliance reviews, working enforcement matters from inside the regulator's process, and now advising entities directly through the firm I founded. The work has changed shape over those decades. Federal energy funding has changed less in shape than in scale and in complexity, and many of the entities receiving it were not built to administer it.

This is the first reference in the Energy Compliance, Inc. Grant Funding Series. The series is written for the people doing the work: the grants administrator at a municipal utility, the CFO at an electric cooperative, the project manager at an industrial energy user, the development lead at a renewables IPP. It is not written for grant writers. Grant writers chase awards. I am interested in what happens after the award is won, because that is where almost everything that goes wrong on a federally funded energy project actually goes wrong.

On federal energy awards, the common pattern runs the same way. The application phase gets the attention. The post-award period gets the findings, the disallowances, the prevailing wage examinations, the subrecipient monitoring failures, and the closeout shortfalls. In my view, an entity that wins an award without the underlying readiness can end up worse off than one that defers. Funded projects can unwind into multi-year corrective actions, and credits can be cut at examination when the documentation

discipline was not built before construction started. On a federal energy award, the award decision is rarely the moment of greatest risk.

This document is built backward from those failures. The 47 items below are not the ones a grant writer would pick. They are the items that cause downstream pain when they are not closed before submission. Most are administrative. Some are strategic. None are exotic. Each one has a 30-day, 60-day, and 90-day path that does not require resources beyond what the entity already has, if the entity moves.

This reference is the same diagnostic Energy Compliance, Inc. uses in its Grant Readiness Assessment. The substance is identical. The difference is that the engagement closes the gaps with you. Either way, these 47 items are the right starting list.

Rob Smith Founder and Principal, Energy Compliance, Inc.

Executive Summary

The checklist runs on five axes, each scored on its own.

1. **Entity readiness.** Is the applying organization structurally prepared to receive and administer federal money?
2. **Project readiness.** Does this specific project carry the documentation and financial structure to survive scrutiny?
3. **Federal cross-cutting readiness.** Is the application positioned against the federal overlay: environmental and historic review, domestic preference, labor standards, civil rights, and the certifications?
4. **Compliance program readiness.** Does the entity have the internal control infrastructure that 2 CFR Part 200 presupposes?
5. **Strategic positioning.** Is the application built to compete on the program's actual scoring criteria and field?

The axes fail in different ways. An entity with strong infrastructure and weak cross-cutting positioning will lose awards it should have won. A project with airtight technical positioning inside an entity without procurement discipline will lose money after it wins.

Each item scores 0 (Not Ready), 1 (Partial), or 2 (Ready). The maximum is 94. Scoring bands are in Section 6. In my judgment, an application below the green band is more likely to harm the entity than help it. The project may be worthy. The entity is not yet built to carry the obligations that come with the money.

What changed in this edition

Several federal rules moved after the first edition, and items moved with them.

- **Justice40 and Community Benefits Plans.** Executive Order 14008, the source of Justice40, was revoked in January 2025, and DOE rescinded its Community Benefits Plan guidance the same month. Items 3.6 and 3.7 follow the current NOFO.
- **NEPA.** CEQ removed its NEPA regulations effective April 11, 2025, and DOE revised its own NEPA rule in July 2025. Item 3.1 points to the agency's current procedures.
- **Uniform Guidance citations.** The 2024 revision raised the de minimis indirect rate to up to 15 percent. Citations in this edition follow the current numbering: subrecipient monitoring at 2 CFR 200.332, procurement standards at 200.317 through 200.327.
- **Clean electricity credits.** Public Law 119-21 ended 45Y and 48E for wind and solar placed in service after 2027, unless construction began by July 4, 2026. See item 3.5.

Use this as a working document. Run it when the NOFO posts, again sixty days out, and before submission. The closures become evidence the entity earned the award.

How to Use This Checklist

Three steps. Each one matters.

Step One. Score honestly.

A scorecard that flatters the entity into thinking it is more ready than it is causes more damage than one that finds gaps. Score each item against what a federal program officer would see if they walked through your operation tomorrow, not against what leadership would prefer to be true. "We have it but it has never been exercised against a federal award" is Partial. "We will build it once we win" is Not Ready.

Step Two. Turn every Partial and Not Ready into an action.

Each item carries a 30/60/90 framework. The 30-day action is what someone on the team can start this week. The 60-day action gets the gap to functional. The 90-day action gets it to audit-defensible. Assign each action to a named owner. Anonymous gaps do not close. A readiness exercise can die in the space between "we should fix that" and someone owning the fix.

Step Three. Re-score before submission.

A pre-submission re-score that shows movement on items that were Partial or Not Ready is a credibility signal, to your own leadership and to the program officer who reads the application. Where the re-score shows no movement, that is information too. It tells you which gaps will not close in time, and the application strategy should reflect that rather than gloss over it.

The scoring scale

Not Ready is 0. Partial is 1. Ready is 2. The maximum total is 94. The bands in Section 6.1 are my judgment, built on the scale. They are not a regulatory standard.

1 Entity Readiness

Ten items. The question this section answers: does the applying organization have the structural, administrative, and financial infrastructure that federal funding presupposes?

1.1 SAM.gov Registration, Active and Current

Why it matters. Federal awards run through the System for Award Management. An expired or pending registration stalls the application, holds up payment, and complicates reporting.

Ready. SAM.gov registration is active, with expiration more than 90 days out. The authorized representative is current. NAICS codes and the Unique Entity ID (UEI) match the entity's actual scope and current ownership structure.

Partial. Registration is active but expires within 90 days, or the authorized representative has changed without a SAM update, or the NAICS codes are stale against current activities.

Not Ready. Registration is expired, pending, or never completed.

30 / 60 / 90.

- 30: Verify registration status at SAM.gov. Confirm the authorized representative. Calendar the renewal 60 days before expiration.
- 60: Update NAICS codes to reflect actual project activities. Confirm the UEI carries correctly into Grants.gov, agency systems, and any subrecipient registrations.
- 90: Document the renewal workflow as a recurring administrative SOP. Assign a backup administrator with credentials.

1.2 Unique Entity ID (UEI) Propagation

Why it matters. The UEI assigned in SAM.gov replaced the DUNS number on April 4, 2022. Every federal system that references the entity needs the correct UEI. A mismatch between SAM, Grants.gov, and an agency portal can delay payment and stall the application itself.

Ready. The UEI is confirmed in SAM.gov, Grants.gov, and every federal portal the entity uses, such as ASAP.gov, FedConnect, or an agency-specific system.

Partial. The UEI is correct in SAM but has not been checked across the secondary portals.

Not Ready. The UEI has not been confirmed, or it differs across systems.

30 / 60 / 90.

- 30: Inventory every federal portal the entity touches. Log the UEI displayed in each.
- 60: Reconcile any mismatch through each agency's published process.
- 90: Build a one-page reference card with the entity's UEI, registered representative, and portal access. Hand it to grants administration.

1.3 NAICS Code Alignment with Project Scope

Why it matters. NAICS codes show up in eligibility screens and in how reviewers read the applicant. Codes that do not match the work invite questions the application should not have to answer.

Ready. Entity NAICS codes accurately describe primary and secondary activities. Project activities align with the program's eligible activity categories.

Partial. The codes are technically accurate but include unused or outdated entries that may confuse a reviewer.

Not Ready. NAICS codes have not been reviewed against the program's eligible activities.

30 / 60 / 90.

- 30: Review current NAICS codes against the entity's actual project activities.
- 60: Map project activities to the target program's eligible activity categories.
- 90: Update the SAM.gov NAICS profile to reflect current and planned activities.

1.4 Entity Type and Eligibility Classification

Why it matters. Federal energy programs often restrict eligibility by entity type: municipal utility, electric cooperative, investor-owned utility, independent power producer, industrial user, tribal entity, nonprofit, public power. The entity's legal classification matters as much as its operational identity. It also decides which rules apply. A for-profit DOE recipient, for example, follows the FAR cost principles in 48 CFR 31.2 instead of the Part 200 cost principles (2 CFR 910.352).

Ready. The entity's legal classification is documented. Its eligibility category for the target program is confirmed in writing against the NOFO language.

Partial. The entity knows what it is, but eligibility under this program has not been checked against the current NOFO.

Not Ready. Classification is ambiguous, or nobody has read the program's eligibility rules.

30 / 60 / 90.

- 30: Pull the current NOFO. Locate the eligibility section. Map the entity to one or more eligible categories.
- 60: If anything is ambiguous, submit a clarification question to the program office during the question-and-answer period.
- 90: Document the eligibility determination in writing and file it with the application work package.

1.5 Prior Federal Award History

Why it matters. Past performance shapes how reviewers and the awarding agency see an applicant. A clean record of prior awards strengthens the application. Open findings or unresolved closeouts weaken it. If the entity knows what it carries, the narrative can address prior history directly instead of leaving the program officer to find it.

Ready. Prior federal award history is documented: dates, awarding agencies, amounts, performance outcomes, closeout status, and any audit findings.

Partial. The entity has received federal funding before, but the documentation is incomplete or scattered across departments.

Not Ready. No inventory of prior awards exists.

30 / 60 / 90.

- 30: Compile the prior award inventory. One row per award.
- 60: Confirm closeout status of every prior award. Resolve anything still in corrective action.
- 90: Write the past-performance paragraph for the application, anchored to specific awards and outcomes.

1.6 Single Audit Status

Why it matters. A non-federal entity that expends \$1,000,000 or more in federal awards in its fiscal year must have a single or program-specific audit under 2 CFR 200.501. The 2024 Uniform Guidance revision raised that threshold from \$750,000. For-profit DOE recipients face a separate compliance audit under 2 CFR 910.501. The regulation still reads \$750,000, but DOE's class deviation in Policy Flash 2025-02 (October 2, 2024) raises the threshold to \$1,000,000 until DOE completes its rulemaking. The most recent audit report is among the first documents a reviewer will want, and prior findings do not disappear because the application leaves them out. A report with findings is not disqualifying, as long as the entity can walk through the corrective action plan and its current status.

Ready. The most recent single audit (or compliance audit) is complete and available, with no findings, or with findings limited to activity outside federal awards. The Schedule of Expenditures of Federal Awards (SEFA) is current.

Partial. An audit was performed but carried findings, the audit is in progress, or prior-year findings have not been cleared.

Not Ready. The entity has never been subject to a single audit, expects to be once an award arrives, and has no audit infrastructure.

30 / 60 / 90.

- 30: Locate the most recent audit report. Verify the SEFA.
- 60: Identify any open findings. Document the corrective action plan and its status.
- 90: If the award will push the entity over the threshold, engage an audit firm before the period of performance begins. Do not wait for year-end.

1.7 Accounting System Capacity

Why it matters. Federal awards need an accounting system that tracks expenditures by award, by Assistance Listing Number (ALN, formerly CFDA), by cost category, and by period of performance. A system that cannot do this creates cost-allowability risk and makes every Federal Financial Report (SF-425) harder than it should be.

Ready. The system tracks federal expenditures by award, ALN, cost category, and period. Reports generate cleanly. The indirect cost approach is documented: a negotiated rate, or the de minimis rate of up to 15 percent of modified total direct costs (2 CFR 200.414(f)).

Partial. The system produces federal reports only with manual rework. No indirect cost approach is formally established.

Not Ready. The system cannot separate federal expenditures from general fund activity. No indirect cost strategy.

30 / 60 / 90.

- 30: Inventory the system's reporting capability against federal reporting requirements.
- 60: Configure award-level tracking codes. Implement cost category segmentation.
- 90: Settle the indirect cost posture: a negotiated rate with the cognizant agency, a de minimis election, or documented unrecovered indirect cost.

1.8 Time and Effort Reporting

Why it matters. Salaries and wages charged to a federal award must be based on records that accurately reflect the work performed (2 CFR 200.430(g)). Where interim charges rest on budget estimates, the internal controls must include after-the-fact reviews so the final charge is accurate. The records system has to exist before the first personnel cost hits the award.

Ready. A time and effort policy exists, is followed, and produces records that tie labor hours to specific awards.

Partial. A policy exists but is followed inconsistently, or the records lack the detail to answer an auditor's question.

Not Ready. No time and effort reporting infrastructure.

30 / 60 / 90.

- 30: Draft or refresh the time and effort policy. Identify who will charge time to the upcoming award.
- 60: Start the reporting cadence. Capture the first cycle of records and reviews.
- 90: Build the audit file: policy, sample records, exception handling.

1.9 Procurement Policy

Why it matters. Procurement under a federal award must follow the standards in 2 CFR 200.317 through 200.327. Recipients other than States and Indian Tribes must keep documented procurement procedures consistent with State, local, and tribal law and with those federal standards (200.318(a)). Where State or local law is stricter, it still applies. In my view, procurement is one of the most exposed areas on a federal award.

Ready. A written procurement policy reflects the current federal methods (micro-purchase, simplified acquisition, sealed bids, proposals, and noncompetitive procurement) and aligns with stricter State and local law.

Partial. A policy exists but predates the current federal thresholds, or applies State law without the federal overlay.

Not Ready. No documented procurement policy, or a policy that applies only to non-federal spending.

30 / 60 / 90.

- 30: Pull the current procurement policy. Map it against 2 CFR 200.317 through 200.327.
- 60: Update thresholds, conflict of interest provisions, and noncompetitive procurement documentation to current federal language.
- 90: Train procurement staff and project managers on the federal requirements before any federally funded procurement begins.

1.10 Record Retention Program

Why it matters. Recipients must keep federal award records for three years from the date they submit the final financial report (2 CFR 200.334). The clock extends while litigation, claims, or audit findings remain open, and when the agency asks in writing. Records for property and equipment bought with federal funds must be kept for three years after final disposition. The records must stay accessible and complete for that whole period.

Ready. The retention policy states the federal requirements explicitly. Records are stored in a structure that survives staff turnover, system migration, and audit retrieval.

Partial. An entity-level retention policy exists but does not address federal award requirements.

Not Ready. No documented retention program, or records scattered across personal drives, email accounts, and uncontrolled storage.

30 / 60 / 90.

- 30: Document current retention practice. Identify gaps against 2 CFR 200.334.
- 60: Set up the award-specific retention file structure. Attach retention metadata to each award.
- 90: Train staff on the retention workflow. Build the audit retrieval SOP.

2 Project Readiness

Nine items. The question this section answers: does the project being submitted carry the documentation, structure, and financial framework that program scoring and post-award scrutiny require?

2.1 Project Description and Technical Approach

Why it matters. The project description is the application's spine. Reviewers read it first and most carefully. A description that is vague on site, technology, scope, and operating profile reads as immature, whatever the project's actual merit.

Ready. The description is complete: site location, technology, capacity, operating profile, interconnection status, expected commercial operation date, and integration with existing assets. An outside technical reader can follow it without questions.

Partial. The description is there but lacks key specifics, or relies on placeholder language that will need revision.

Not Ready. The description is conceptual. No site or technology lock-in.

30 / 60 / 90.

- 30: Draft the project description. List the missing technical details.
- 60: Fill the gaps with engineering input. Add interconnection and operating profile detail.
- 90: Have someone outside the project read the final description. Revise based on their questions.

2.2 Site Control

Why it matters. Energy programs commonly ask for evidence of site control: ownership, easement, lease, option, or another enforceable right to use the site. Check the NOFO for what it will accept and when.

Ready. Site control documentation is in hand: deed, lease, option, easement, or another instrument that will hold up in program review.

Partial. Site control is in negotiation, with a letter of intent or term sheet but no executed agreement.

Not Ready. The site is identified but unsecured.

30 / 60 / 90.

- 30: Verify the instrument in hand. Confirm it covers the period of performance plus the operating life.

- 60: If site control is incomplete, push the executed agreement. Do not count on a reviewer accepting a term sheet.
- 90: Assemble the site control file, including contingencies, conditions precedent, and termination triggers.

2.3 Single-Line Diagram and Engineering Documentation

Why it matters. Energy projects need engineering documentation behind the technical approach: single-line diagrams, civil drawings, equipment specifications. Some programs ask for these at application. Expect them in pre-award negotiation if the project advances.

Ready. The single-line diagram and core engineering documentation are complete and reviewable.

Partial. Conceptual engineering exists. Final documentation is in progress.

Not Ready. Engineering not yet engaged.

30 / 60 / 90.

- 30: Confirm the engineering scope is contracted. Set the deliverable timeline against the submission deadline.
- 60: Single-line and core diagrams complete in draft.
- 90: Final engineering documentation ready to attach.

2.4 Project Budget Construction

Why it matters. The application budget is not a number. It is a defended statement of the project's cost basis, broken into federal cost categories, mapped to the period of performance, and built to survive a cost-reasonableness review. A cost-disallowance finding can trace back to the budget submitted with the application. The budget you submit sets the audit footprint for years.

Ready. The budget is complete, segmented by federal cost category (personnel, fringe, travel, supplies, equipment, contractual, construction, other, indirect), mapped to the period of performance, and backed by quotes.

Partial. The budget exists at totals level but lacks cost category structure or quote backup.

Not Ready. The budget is conceptual or rests on order-of-magnitude estimates without support.

30 / 60 / 90.

- 30: Reorganize the budget into federal cost categories.
- 60: Collect quotes for every line item. Document the cost-reasonableness method.
- 90: Write the budget narrative. Tie every line to project activities and milestones.

2.5 Cost Share and Match Funding

Why it matters. Many federal energy programs require non-federal cost share. For DOE research and development, the statutory floor is generally 20 percent, and for demonstration and commercial application it is generally 50 percent, with exceptions and reductions the Secretary can apply (42 U.S.C. 16352). Other programs set their own levels, so read the NOFO.

To count, cost share must be verifiable in the entity's records, not counted toward another federal award, and allowable, among the other tests in 2 CFR 200.306(b). It must be committed, not hoped for.

Ready. Cost share is committed in writing. Sources are identified (entity equity, utility match, state funding, foundation grant, tax equity, third party). The match is allowable under program rules.

Partial. Cost share is identified but not all of it is committed in writing, or part of it depends on the federal award itself.

Not Ready. No cost share strategy, or cost share rests entirely on speculative future commitments.

30 / 60 / 90.

- 30: Identify every cost share source. Separate committed from contingent.
- 60: Secure written commitments for the largest components: letters from utility partners, state agencies, or foundations.
- 90: Build the cost share file. Map sources to federal cost categories. Check each against 2 CFR 200.306 and the program rules.

2.6 Pro Forma and Financial Model

Why it matters. Many energy programs weigh project economics: payback, levelized cost of energy, ratepayer impact, system value. The pro forma is the analysis behind the narrative. An application that asserts economic outcomes without a defensible model loses ground.

Ready. The pro forma is internally consistent and reviewable. Assumptions are documented. Sensitivity to key variables is captured.

Partial. A model exists but is informal or lacks sensitivity analysis.

Not Ready. No financial model.

30 / 60 / 90.

- 30: Build the pro forma. Identify assumption gaps.
- 60: Document the assumptions. Run sensitivity scenarios.
- 90: Have an outside finance person pressure-test the model. Document any revisions.

2.7 Project Schedule and Milestones

Why it matters. The schedule has to fit the period of performance. A schedule without milestone structure, dependency mapping, or realistic durations is a red flag in pre-award negotiation.

Ready. The schedule is complete: milestones, dependencies, durations, and critical path, aligned to the period of performance.

Partial. A schedule exists but lacks dependency mapping or critical-path analysis.

Not Ready. No project schedule.

30 / 60 / 90.

- 30: Build the milestone framework. List every milestone the project must hit.
- 60: Map dependencies. Identify the critical path.
- 90: Test the schedule against the period of performance. Add contingency where it belongs, including the review timelines in Section 3.

2.8 Project Team and Key Personnel

Why it matters. Many programs ask for named key personnel with documented credentials. A narrative that gestures at "qualified team members" without names underperforms one that puts specific people on the page.

Ready. Key personnel are named. Resumes and qualifications are documented. Letters of commitment from team members outside the entity are in hand.

Partial. Key personnel are identified internally, but external team members are not committed.

Not Ready. The team is conceptual.

30 / 60 / 90.

- 30: Name a person for every role the application requires.
- 60: Collect resumes and qualifications. Confirm time commitments.
- 90: File letters of commitment from external team members with the application.

2.9 Project Risk Register

Why it matters. Some programs ask for risk management as part of the project management narrative; check the NOFO. A documented risk register shows execution maturity that many competing applications lack.

Ready. A project-specific risk register lists identified risks, likelihood, impact, mitigation, and owner. It is maintained as a living document.

Partial. Risks are discussed internally but not captured in a structured register.

Not Ready. No risk register.

30 / 60 / 90.

- 30: Set up the register template. Identify the top fifteen risks.
- 60: Score likelihood and impact. Assign mitigation owners.
- 90: Work the register into the project management narrative.

3 Federal Cross-Cutting Readiness

Eleven items. The question this section answers: has the applicant positioned the project against the federal requirements that ride along with most energy awards, whatever the program? Which ones apply depends on the funding statute, the agency, and the award terms. Confirm each against the NOFO.

3.1 NEPA: National Environmental Policy Act

Why it matters. A federal funding decision is a federal action, and NEPA review applies. Depending on the project, the review can be a categorical exclusion, an environmental assessment (EA), or an environmental impact statement (EIS). The process now runs on each agency's own procedures. CEQ removed its government-wide NEPA regulations effective April 11, 2025, and DOE revised its NEPA rule at 10 CFR Part 1021 by interim final rule in July 2025. NEPA timing can dominate the post-award schedule if it is not planned at application.

Ready. The likely review level is identified: categorical exclusion, EA, or EIS. Pre-screening documentation is collected. Engagement with the awarding agency's NEPA staff is planned.

Partial. NEPA is acknowledged, but the review level has not been confirmed.

Not Ready. NEPA has not been addressed.

30 / 60 / 90.

- 30: Confirm the federal nexus. Pull the awarding agency's current NEPA procedures and identify the likely review level.
- 60: Collect pre-screening documentation: resource maps, prior environmental reviews, programmatic agreements.
- 90: Document the NEPA strategy in the application. If an EA or EIS is likely, build its timeline into the project schedule.

3.2 NHPA Section 106: Cultural and Historic Review

Why it matters. Section 106 of the National Historic Preservation Act requires federal agencies to take into account the effects of their undertakings on historic properties (36 CFR 800.1). The agency consults with the State Historic Preservation Officer and with Indian tribes that attach religious and cultural significance to affected properties, and the Advisory Council on Historic Preservation can enter the process. That consultation can drive schedule and scope.

Ready. Section 106 applicability is assessed. Pre-screening identifies any historic properties, tribal interests, or cultural resources within the area of potential effects.

Partial. Section 106 is acknowledged, but the area of potential effects has not been mapped.

Not Ready. Section 106 has not been considered.

30 / 60 / 90.

- 30: Map the likely area of potential effects. Run preliminary searches for historic properties and tribal interests.
- 60: Open informal conversations with the SHPO and tribes where appropriate, coordinated with the awarding agency.
- 90: Document the Section 106 strategy in the application.

3.3 BABA: Build America, Buy America

Why it matters. The Build America, Buy America Act in the Infrastructure Investment and Jobs Act bars agencies from obligating funds for an infrastructure project unless all iron, steel, manufactured products, and construction materials incorporated into it are produced in the United States (2 CFR 184.1). Infrastructure explicitly includes electrical transmission facilities and systems (2 CFR 184.4(c)). The preference flows down to subawards, contracts, and purchase orders. Each material category has its own standard. Agencies can grant public interest, nonavailability, and unreasonable cost waivers (2 CFR 184.7), but a waiver takes a structured justification and time.

Ready. BABA applicability is confirmed. A domestic content strategy is documented for each material category. Supplier engagement on domestic sourcing has begun.

Partial. BABA is acknowledged, but supplier sourcing has not been verified.

Not Ready. BABA has not been addressed.

30 / 60 / 90.

- 30: Confirm whether the funding carries the Buy America preference. Identify the material categories in scope.
- 60: Engage suppliers on domestic sourcing certifications. Identify items that may need a waiver.
- 90: Document the BABA compliance strategy. If waivers are needed, start the request.

3.4 Davis-Bacon and Related Prevailing Wage Requirements

Why it matters. Davis-Bacon prevailing wages reach grant-funded construction when the funding statute requires it. For energy programs funded under Division D of the Infrastructure Investment and Jobs Act, laborers and mechanics on assisted construction must be paid no less than the Davis-Bacon prevailing rate (42 U.S.C. 18851). Wage determinations, certified payrolls, and the contract clauses in 29 CFR 5.5 apply across the construction period.

In my view, Davis-Bacon is one of the most exposed areas on a federally funded construction project, and the problems tend to surface late, after the certified payrolls have been filed and the back-wage exposure has grown. The time to build the compliance infrastructure is before the first contractor mobilizes, not after the Wage and Hour Division asks for the file.

Ready. Davis-Bacon applicability is confirmed. The wage determination process is understood. A certified payroll system is in place or contractually required of contractors and subcontractors.

Partial. Davis-Bacon is acknowledged, but contractor compliance infrastructure is not in place.

Not Ready. Davis-Bacon has not been addressed.

30 / 60 / 90.

- 30: Confirm Davis-Bacon applicability from the funding statute and NOFO. Identify the applicable wage determinations.
- 60: Build the Davis-Bacon clauses into contractor and subcontractor agreements. Set up the certified payroll review process.
- 90: Train procurement and project management staff on Davis-Bacon obligations.

3.5 Clean Energy Tax Credit Prevailing Wage and Apprenticeship (PWA)

Why it matters. For the clean electricity credits under 26 U.S.C. 45Y and 48E, meeting the prevailing wage and apprenticeship requirements is what lifts the credit from the base rate to five times the base rate. Under 48E, that is 6 percent versus 30 percent of the qualified investment. Facilities under 1 megawatt (AC) get the higher rate without PWA. This is a separate framework from Davis-Bacon, with its own rules in 26 CFR 1.45-7 and 1.45-8, and it applies whether or not the project also carries grant funding. Apprenticeship requires that qualified apprentices perform at least 15 percent of total labor hours for facilities beginning construction after 2023, subject to a good faith effort exception.

Failures can be cured, but cure is expensive: correction payments to workers plus a \$5,000 penalty per underpaid worker, rising to \$10,000 for intentional disregard. Without a cure, the credit falls back to the base rate. The documentation is built during construction or it is not built at all.

Check the timeline too. Public Law 119-21 ended 45Y and 48E for wind and solar facilities placed in service after December 31, 2027, unless construction began on or before July 4, 2026. Confirm the project's credit posture with tax counsel before you build PWA compliance into the plan.

Ready. The project's credit posture and PWA applicability are confirmed. Wage determination tracking, payroll records, and registered apprenticeship engagement are documented.

Partial. PWA is acknowledged, but the compliance infrastructure is incomplete.

Not Ready. PWA has not been addressed.

30 / 60 / 90.

- 30: Confirm the credit posture and PWA applicability with tax counsel. Identify wage determinations.
- 60: Engage registered apprenticeship programs. Set up apprenticeship labor-hour tracking.
- 90: Document the PWA compliance plan. Build payroll review and good faith effort documentation.

3.6 Federal Policy Currency of the Application

Why it matters. Federal policy priorities shifted sharply in 2025. Executive Order 14008, the source of the Justice40 Initiative, was revoked in January 2025 (Executive Orders 14148 and 14154). DOE rescinded its Justice40 coding guidance and its Community Benefits Plan guidance for financial assistance on January 23, 2025 (Policy Flash 2025-16). An application assembled from a prior-round template can still carry language, commitments, and screening tools built for requirements that no longer apply, while missing the priorities the current NOFO actually scores.

Ready. Every narrative section has been checked against the current NOFO and current agency policy. Superseded requirements and template language from earlier rounds have been removed or deliberately retained.

Partial. The narrative has been updated in places, but no section-by-section check against the current NOFO has been done.

Not Ready. The application relies on a prior-round template without review.

30 / 60 / 90.

- 30: List every requirement and priority in the current NOFO. Note any executive order or policy it cites.
- 60: Compare the draft narrative against that list. Flag superseded commitments and missing priorities.
- 90: Revise the narrative. Document what was removed and why, in case the program office asks.

3.7 Community Engagement and Benefits Commitments

Why it matters. DOE no longer applies its Community Benefits Plan guidance, but community engagement, workforce, and local benefit commitments still appear in some federal, state, and utility programs, and in the permitting and offtake processes around the project. Where the current program asks for them, they are scored. Where it does not, any commitment the entity volunteers can still become an award term it has to meet and report on.

Ready. The entity knows exactly what community, workforce, or benefit commitments the target program requires. Required commitments are drafted, and every commitment is one the entity can deliver and document.

Partial. Some commitments are drafted, but they have not been checked against the program's requirements or the entity's capacity to deliver.

Not Ready. The question has not been considered.

30 / 60 / 90.

- 30: Identify what, if anything, the target program requires on community engagement and benefits.
- 60: Draft the required commitments. Engage community partners for input where the program calls for it.

- 90: Finalize the commitments. Confirm partner commitments in writing and assign an owner for post-award reporting.

3.8 Tribal Consultation

Why it matters. Projects on or near tribal land, with tribal benefit, or with potential effects on tribal interests can trigger consultation through the Section 106 and NEPA processes. Consultation is the agency's obligation, but the applicant's schedule absorbs the time, and it cannot be compressed late in the application timeline.

Ready. Applicability is assessed. Where consultation is likely, the awarding agency has been engaged on it.

Partial. Consultation may apply but has not been raised with the agency.

Not Ready. Tribal consultation has not been considered.

30 / 60 / 90.

- 30: Confirm whether tribal consultation is likely. Identify potentially affected tribes.
- 60: Coordinate with the agency's tribal liaison on engagement.
- 90: Document the consultation status. Build any required timelines into the project schedule.

3.9 Civil Rights and Nondiscrimination Compliance

Why it matters. Federal financial assistance carries civil rights obligations under Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and related statutes. DOE implements them for its recipients in 10 CFR Part 1040. Parts of that rule are subject to DOE rescission actions published in May 2025, with the effective date now delayed to December 28, 2026, so check the current text before you rely on a specific section. The entity's nondiscrimination and accessibility infrastructure should be documented before federal money flows.

Ready. Civil rights compliance is documented: nondiscrimination policy, language access, accessibility.

Partial. Some documentation exists but is dated or scattered.

Not Ready. No documented civil rights compliance infrastructure.

30 / 60 / 90.

- 30: Review current civil rights documentation against the awarding agency's regulations.
- 60: Update nondiscrimination policies and language access plans as required.
- 90: Build the civil rights compliance file to go with the application.

3.10 Lobbying Certification

Why it matters. Under 31 U.S.C. 1352 and the agency rules implementing it, an applicant for a federal grant or cooperative agreement over \$100,000 must certify that it has not used and will not use appropriated federal funds to influence federal officials in connection with the award. For

DOE, the rule is 10 CFR Part 601, and the certification is filed with the application. Contractors bidding on contracts over \$100,000 under the award certify up the tier (2 CFR Part 200, Appendix II). A missing certification can stall award processing.

Ready. The certification is prepared and signed by the authorized representative.

Partial. The requirement is understood but the certification is not executed.

Not Ready. The certification has not been considered.

30 / 60 / 90.

- 30: Identify the lobbying certification the program requires.
- 60: Prepare it. Confirm the authorized representative.
- 90: Execute it and file it with the application package. Add the flow-down to contractor agreements.

3.11 Conflict of Interest Documentation

Why it matters. Recipients must keep written standards of conduct covering conflicts of interest for employees involved in selecting, awarding, and administering contracts, and organizational conflict standards where a non-governmental parent, affiliate, or subsidiary exists (2 CFR 200.318(c)). They must also disclose potential conflicts to the agency under its policy (2 CFR 200.112). DOE added its own conflict of interest and conflict of commitment requirements for financial assistance at 2 CFR Part 910, Subpart C, published July 16, 2026 and effective August 17, 2026. A conflict that surfaces after award without prior disclosure invites findings and disallowance.

Ready. A written conflict of interest policy exists. Procurement-level conflict disclosure works in practice. Personal conflict disclosure is in place for key personnel, including any agency-specific disclosures.

Partial. A policy exists but has never been exercised against a federal procurement.

Not Ready. No documented conflict of interest framework.

30 / 60 / 90.

- 30: Pull the current policy. Map it against 2 CFR 200.318(c) and the awarding agency's rules.
- 60: Update the policy. Implement personal conflict disclosure for key personnel.
- 90: Train procurement and program staff on disclosure requirements.

4 Compliance Program Readiness

Ten items. The question this section answers: does the entity have the internal control infrastructure that Subparts D and E of 2 CFR Part 200 presuppose?

4.1 Uniform Guidance Familiarity

Why it matters. 2 CFR Part 200, the Uniform Guidance, is the operating manual for federal awards. Entities that have not worked with it before accepting an award tend to make avoidable cost-allowability errors early in the period of performance.

Ready. Key personnel have working familiarity with Subparts D, E, and F. Reference copies are available.

Partial. Some staff have encountered the Uniform Guidance, but it is not part of operating procedure.

Not Ready. No engagement with the Uniform Guidance.

30 / 60 / 90.

- 30: Distribute current 2 CFR Part 200 reference material to grants administration and finance staff.
- 60: Run an internal training session on the Subpart E cost principles.
- 90: Build a Uniform Guidance quick-reference card for project managers.

4.2 Internal Control Framework

Why it matters. 2 CFR 200.303(a) requires recipients to establish, document, and maintain effective internal control over the federal award. Those controls should align with GAO's *Standards for Internal Control in the Federal Government* (the Green Book) or COSO's *Internal Control-Integrated Framework*. Documenting the framework comes before the award, not after.

Ready. A documented internal control framework, aligned to the Green Book or COSO, exists. An annual self-assessment is performed.

Partial. Controls exist in practice but are not documented against either framework.

Not Ready. No documented internal control framework.

30 / 60 / 90.

- 30: Inventory current internal controls. Map them against the components of the framework you adopt.
- 60: Document the framework. Identify gaps.
- 90: Build the annual self-assessment SOP.

4.3 Subrecipient Monitoring Capacity

Why it matters. A pass-through entity must evaluate each subrecipient's risk and monitor its activities under 2 CFR 200.332. When subrecipient monitoring fails, the usual story is this. The pass-through entity treated the subaward like a vendor contract. The subrecipient operated outside the federal compliance overlay. The finding landed on the pass-through entity, not the sub. Monitoring capacity has to exist before subawards go out. Building it after the first finding costs more than building it at the start.

Ready. A subrecipient monitoring policy exists. The risk assessment process is documented. Monitoring frequency follows each subrecipient's risk rating.

Partial. Some monitoring happens, inconsistently.

Not Ready. No documented subrecipient monitoring process.

30 / 60 / 90.

- 30: Identify the expected subrecipients on the upcoming award, and confirm which relationships are subawards and which are contracts (2 CFR 200.331).
- 60: Build the risk assessment framework. Set up the monitoring plan template.
- 90: Train the staff who will monitor. Document the workflow.

4.4 Procurement Decision Documentation

Why it matters. Every federally funded procurement needs records sufficient to detail its history: the rationale for the method, the contract type, the contractor selection or rejection, and the basis for the price (2 CFR 200.318(i)). Expect the procurement files to be sampled on audit.

Ready. A standard procurement decision file structure exists, and every federal procurement is documented in it.

Partial. Procurement documentation exists but in inconsistent formats.

Not Ready. No standard procurement file structure.

30 / 60 / 90.

- 30: Build the standard procurement decision file template.
- 60: Train procurement staff on the documentation requirements.
- 90: Check recent procurements against the template. Identify gaps in past files.

4.5 Cost Principles Application

Why it matters. Subpart E of 2 CFR Part 200 sets the cost principles: allowability, allocability, reasonableness. (For-profit DOE recipients: see item 1.4.) The principles apply when the cost is incurred, not when the auditor arrives. Staff who incur federal costs need to understand them first.

Ready. Cost principles training is part of onboarding for anyone incurring federal costs. Reference material is available.

Partial. Finance understands the cost principles. The program staff spending the money do not.

Not Ready. No cost principles training.

30 / 60 / 90.

- 30: Build the cost principles training module.
- 60: Deliver it to project managers and program staff.
- 90: Make it a required part of onboarding for any role with federal expenditure authority.

4.6 Property Management Infrastructure

Why it matters. Real property and equipment acquired under a federal award carry the management and disposition requirements in 2 CFR 200.310 through 200.316: use, records, inventory, and disposition. Property problems can mean compensating the federal government for its share well after the award closes.

Ready. A property management policy exists. Tagging and inventory for federally funded property work in practice.

Partial. Some property management exists but is not aligned to federal requirements.

Not Ready. No federal property management infrastructure.

30 / 60 / 90.

- 30: Confirm whether the upcoming project will acquire real property or equipment with federal funds.
- 60: Set up property tagging and inventory.
- 90: Document the property management SOP. Train staff to tag at receipt.

4.7 Audit Liaison Capacity

Why it matters. Single audits, program reviews, and Inspector General inquiries need a designated liaison who can respond quickly, pull documentation, and manage the workflow. Entities without one respond slowly, and slow responses make findings more likely.

Ready. The audit liaison role is designated. A backup is named.

Partial. A senior staff member would lead an audit, but the role is not formalized.

Not Ready. No designated audit liaison.

30 / 60 / 90.

- 30: Designate the liaison and the backup.
- 60: Build the audit response SOP.
- 90: Run a tabletop audit response exercise.

4.8 Documentation File Architecture

Why it matters. Federal audit defense lives in document retrieval. A request for the procurement file on a specific contract should not require an archaeological dig. File architecture built around how auditors ask for records makes retrieval a lookup instead of a search.

Ready. Award-specific file architecture exists, organized in nine layers: Award, Financial, Procurement, Subrecipient, Performance, Property, Personnel, Cross-cutting, Closeout.

Partial. Files exist but in inconsistent structures across awards.

Not Ready. No standard file architecture.

30 / 60 / 90.

- 30: Build the standard award file architecture.
- 60: Move active awards into it.
- 90: Document the file architecture SOP. Train staff.

4.9 Reporting Calendar and Cadence

Why it matters. Federal awards carry financial and performance reports at set intervals, plus milestone and event-driven reports the award terms specify. A reporting calendar with named owners and lead-time alerts prevents one of the most avoidable federal funding errors: the late report.

Ready. A reporting calendar exists for every active award. Owners are named. Lead-time alerts are set.

Partial. Reporting is tracked informally.

Not Ready. No reporting calendar.

30 / 60 / 90.

- 30: Build the reporting calendar template.
- 60: Populate it for the expected award. Set the alerts.
- 90: Train staff on the reporting workflow.

4.10 Closeout Capacity

Why it matters. Under 2 CFR 200.344, a recipient must submit all final reports and liquidate all obligations no later than 120 calendar days after the period of performance ends, and promptly refund unobligated funds it is not authorized to keep. Subrecipients answer to the pass-through entity on a 90-day clock. Late closeout keeps awards open past the period of performance and complicates the next application.

Ready. A closeout SOP exists. Recent awards closed within the required windows.

Partial. Closeout has been done, inconsistently.

Not Ready. No documented closeout process.

30 / 60 / 90.

- 30: Review the closeout requirements for the expected program.
- 60: Build the closeout SOP.
- 90: Train staff on the closeout workflow.

5 Strategic Positioning

Seven items. The question this section answers: is the application positioned to compete against the program's actual scoring criteria and the field of applicants?

5.1 Win Theme Framework

Why it matters. Every competitive program has preferences embedded in its scoring criteria. Applications that answer the questions the program is actually asking beat applications that recite the project's merits in generic terms.

Ready. Win themes come from analysis of the NOFO, prior funded projects, and program office briefings. The themes show up in the narrative.

Partial. Some themes are understood but not woven into the narrative.

Not Ready. No win theme analysis.

30 / 60 / 90.

- 30: Analyze the NOFO scoring criteria. Identify the underlying program priorities.
- 60: Review prior funded projects in the program. Identify common themes.
- 90: Build the win themes into every narrative section.

5.2 Competitive Set Understanding

Why it matters. A competitive program funds the best applications, not every qualified one. Knowing who else will apply, and what their applications will look like, shapes how yours stands apart.

Ready. The competitive set is understood: likely applicants, prior round outcomes, expected demand against available funding.

Partial. Some competitive intelligence exists, informally.

Not Ready. No competitive analysis.

30 / 60 / 90.

- 30: Identify likely applicants. Pull prior round award data where it is published.
- 60: Map the differentiation strategy.
- 90: Sharpen the application around the differentiators.

5.3 Partners and Letters of Support

Why it matters. Energy programs reward real partnerships: utility, community, technical, financial. A letter of support that names specific actions and contributions carries more weight than a generic endorsement.

Ready. The partner strategy is documented. Letters of support are committed and executed.

Partial. Partners are identified, but letters are not executed.

Not Ready. No partner strategy.

30 / 60 / 90.

- 30: Identify required and helpful partners.
- 60: Engage them. Draft letter templates that show specific commitment.
- 90: Execute the final letters. File them with the application.

5.4 Past Performance Narrative

Why it matters. Applications that document past performance with specific outcomes (completed projects, prior awards delivered on time and on budget, audit findings cleared) beat applications that gesture at experience. Item 1.5 builds the inventory. This item turns it into scored narrative.

Ready. The past performance narrative is complete: named projects, outcomes, dates, awarding agencies.

Partial. Past performance is documented internally but not framed for the application.

Not Ready. No past performance documentation.

30 / 60 / 90.

- 30: Compile the past performance inventory.
- 60: Write the narrative.
- 90: Test it against the program's past performance evaluation criteria.

5.5 Capacity Statement

Why it matters. Programs evaluate organizational capacity: financial, technical, managerial. A capacity statement that documents specific capabilities beats one that asserts general expertise.

Ready. The capacity statement is complete and tailored to the program.

Partial. A generic capacity statement exists.

Not Ready. No capacity statement.

30 / 60 / 90.

- 30: Build the capacity statement framework.
- 60: Fill it with specific capabilities, tailored to the program.
- 90: Finalize it and integrate it into the application.

5.6 Program Officer Engagement

Why it matters. Many programs offer informational webinars and a formal question-and-answer channel before the deadline. Applicants who skip them often miss program-specific signals that

engaged applicants pick up. Use the channels the NOFO names, and follow its rules on contact during the competition.

Ready. The program contact and Q&A channel are identified and used. Pre-application questions are resolved.

Partial. The program contact is identified, but no engagement has happened.

Not Ready. No program engagement.

30 / 60 / 90.

- 30: Identify the program contact. Note the webinars and the Q&A period in the NOFO.
- 60: Submit questions through the formal Q&A channel.
- 90: Document the program-specific signals you received and where they changed the application.

5.7 Internal Review Cycles

Why it matters. An application submitted without technical, financial, and legal review surfaces avoidable errors at exactly the moment they can no longer be fixed. A staged internal review shows in the quality of the application itself.

Ready. Review cycles are scheduled: technical, finance, legal, executive. Each is calendared with enough lead time.

Partial. Some review will happen, informally.

Not Ready. No internal review plan.

30 / 60 / 90.

- 30: Build the internal review schedule.
- 60: Set up each review cycle. Confirm reviewers.
- 90: Run the reviews. Incorporate the feedback. Submit.

6 Scoring and What to Do Next

Score each of the 47 items 0 (Not Ready), 1 (Partial), or 2 (Ready). Each axis floor is 60 percent of the axis maximum, rounded to the nearest point.

Axis	Items	Maximum	Axis Floor
1. Entity Readiness	10	20	12
2. Project Readiness	9	18	11
3. Federal Cross-Cutting	11	22	13
4. Compliance Program	10	20	12
5. Strategic Positioning	7	14	8
Total	47	94	56

6.1 Reading the Score

- **Green.** 56 or higher, every axis at or above its floor. Submit from a defensible position.
- **Yellow.** 36 to 55, or any axis below its floor. Defer, narrow the scope, or close the material gaps first.
- **Red.** Below 36. The entity is not yet ready to compete for federal energy funding, whatever the project's technical merit.

A strong total can hide a weak axis. That is why the floors exist. An entity strong on strategy and weak on compliance readiness is the one most likely to win an award it cannot administer.

6.2 Closing Note

This checklist surfaces gaps. Closing them is the work. The 30/60/90 framework names actions, not aspirations. Work it with named owners and re-score before submission.

The entities that win federal energy funding consistently are not the ones with the largest projects or the most polished grant writers. They are the ones whose internal infrastructure makes the application credible and holds up through years of administration. The application is a snapshot of the entity on the day it submits. The post-award period is the movie, and the snapshot has to match it.

Gaps you cannot close in time are decision information. Before you submit, narrow the scope, defer to a future round, or bring in outside help. Submitting against gaps you know will not close is how entities end up in two-year corrective action plans on awards they wish they had passed on.

Glossary

Term	Meaning in this paper
Assistance Listing Number (ALN)	The unique number assigned to a federal assistance program in the Assistance Listings on SAM.gov. It replaced the term CFDA number.
Build America, Buy America (BABA)	The domestic preference requirement in the Infrastructure Investment and Jobs Act for iron, steel, manufactured products, and construction materials used in federally funded infrastructure projects, implemented in 2 CFR Part 184.
Categorical exclusion	A category of action an agency has determined does not normally have a significant effect on the human environment, and so does not normally require an EA or EIS.
Cost sharing	The portion of project costs not paid by federal funds. It includes matching, meaning a required level of cost share (2 CFR 200.306).
Davis-Bacon prevailing wage	The requirement that laborers and mechanics on covered federally funded or assisted construction be paid no less than the locally prevailing wage set by the Department of Labor.
De minimis indirect cost rate	A rate of up to 15 percent of modified total direct costs that a recipient without a negotiated indirect cost rate may elect to charge (2 CFR 200.414(f)).
Modified total direct costs (MTDC)	The base for the de minimis rate: direct salaries and wages, fringe, materials and supplies, services, travel, and up to the first \$50,000 of each subaward, excluding equipment, capital expenditures, and certain other costs.
NEPA	The National Environmental Policy Act, which requires federal agencies to consider the environmental effects of their actions, including funding decisions.
Notice of Funding Opportunity (NOFO)	The formal announcement of available federal funding, stating who is eligible, how applications will be evaluated, and how to apply. DOE has also used the term Funding Opportunity Announcement (FOA).
Pass-through entity	A recipient or subrecipient that provides a subaward to a subrecipient to carry out part of a federal program.
Period of performance	The time between the start and end dates of a federal award.
Prevailing wage and apprenticeship (PWA)	The tax credit requirements under 26 CFR 1.45-7 and 1.45-8 that, when met, raise the clean electricity credits to five times the base rate.
SAM.gov	The System for Award Management, the federal registration system for entities doing business with the government.
Schedule of Expenditures of Federal Awards (SEFA)	The schedule an auditee prepares for the period covered by its financial statements, listing federal award expenditures.

Term	Meaning in this paper
Section 106	The provision of the National Historic Preservation Act requiring federal agencies to take into account the effects of their undertakings on historic properties.
Single audit	The audit of a non-federal entity's financial statements and federal awards required under 2 CFR Part 200, Subpart F, when the entity expends \$1,000,000 or more in federal awards in a fiscal year.
Subrecipient	An entity that receives a subaward from a pass-through entity to carry out part of a federal award.
Unique Entity ID (UEI)	The identifier assigned in SAM.gov that replaced the DUNS number for federal awards on April 4, 2022.
Uniform Guidance	2 CFR Part 200, the government-wide administrative requirements, cost principles, and audit requirements for federal awards.

How Energy Compliance Can Help

This checklist shows where the gaps are. Closing them is file work, and it goes faster with someone who has read evidence files from the auditor's side of the table.

Grant Readiness Assessment. This is the engagement the checklist comes from: a pre-application diagnostic and gap closure across entity, project, and federal cross-cutting readiness. We score it with you and work the 30/60/90 actions to closure.

Energy Funding and Grant Application Support. Application strategy, narrative engineering, budget construction, cross-cutting compliance documentation, and submission management.

Post-Award Compliance Administration. Once the award lands, the Compliance Obligation Matrix, reporting cycles, subrecipient monitoring, and single audit readiness under 2 CFR Part 200.

If your utility or cooperative is also a NERC registered entity, look at **WattOps Compliance**, EC's NERC compliance evidence platform, at wattopscompliance.com. We will run one NERC standard at one of your facilities through WattOps at no cost. CIP standards are excluded.

If the funded project is a renewable or storage plant, **RenewOps**, EC's renewable operations monitoring and analytics platform, gives you the operations view after commercial operation. It includes a Data Center module.

If your score came back yellow or red and the NOFO is already open, call me. We will start with your weakest axis.

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About the Author

Rob Smith is the Founder and Principal of Energy Compliance, Inc., with more than thirty years in the industry on every side of the system. He began in control-room operations as a Reliability Coordinator, Transmission Operator, and Power System Operator across RTO/ISO and utility control centers. On the regulator side, he was a senior compliance auditor and subject matter expert for NERC Reliability Standards. He audited grid facilities, evaluated mitigation adequacy, participated in risk-based oversight of utility mitigation activities, and supported the development of violation notifications and settlements in FERC-directed enforcement actions. He conducted a regulatory audit in the Sultanate of Oman against the Sultanate's Sector Law and Grid Code.

He founded Energy Compliance, Inc. to deliver senior regulator-side compliance authority without the layered staffing and billable-hour overhead of larger firms.

Education:

- MBA, Energy Management, University of Mary
- MSL, Compliance Law, Fordham Law University
- BAS, Energy Management, Bismarck State College
- BAS, Mechanical Engineering, Metallurgy minor, University of Florida
- BAS, Criminology, St. Petersburg College (State Law Enforcement Certification)
- AAS, Power Plant Technology, Bismarck State College
- AAS, Electrical Transmission System Technology, Bismarck State College

Certifications: NERC Lead Auditor training; previously NERC-certified at the Reliability Coordinator level; 1st Class A Boiler Engineer License, Minnesota.

The views expressed in this publication are the author's and do not represent the views of any federal agency.

About Energy Compliance, Inc.

Energy Compliance, Inc. is a specialized energy regulatory, funding, and post-award administration firm based in Bloomington, Minnesota. We work across NERC compliance, RTO and ISO frameworks, Texas PUC matters, clean energy tax credit documentation, and federal grant administration under 2 CFR Part 200.

Our position is compliance-first. Grant writers pursue awards. We build the documentation, audit trail, and obligation matrix that hold up under post-award scrutiny, which is where funded energy projects get into trouble, more often than at the award decision itself.

Our funding and compliance service line covers seven packages:

- **Grant Readiness Assessment.** Pre-application diagnostic and gap closure.
- **Energy Funding and Grant Application Support.** Application strategy, narrative engineering, and submission management.
- **Post-Award Compliance Administration.** Compliance Obligation Matrix, reporting cycles, subrecipient monitoring, and audit readiness.
- **IRA and Tax Credit Compliance Support.** Documentation discipline for investment and production credits, bonus credit stacking, elective pay, and transferability.
- **Utility Regulatory and Legal Support.** FERC, state PUC, and RTO/ISO matters, in coordination with licensed counsel.
- **NERC/CIP and Energy Infrastructure Compliance Support.** RSAW production, audit defense, mitigation, and self-reporting.
- **Engineering Firm Partnership.** White-label and co-delivery work with engineering, EPC, and owner's-engineer firms.

EC also builds software. WattOps Compliance (wattopscompliance.com) is our NERC compliance evidence platform. RenewOps is our renewable operations monitoring and analytics platform, with a Data Center module.

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