



GRANT FUNDING SERIES · FEDERAL ENERGY
AWARDS · EC-WP-903

Utility Funding Opportunity Scorecard

*A seven-dimension pursuit decision tool for utilities
evaluating federal, state, and DOE energy funding.*

In Rob Smith's experience, most funded energy projects that go sideways after award trace back to a pursuit decision that should have gone the other way. This scorecard runs upstream of the application: seven dimensions, explicit Green, Yellow and Red criteria, and a composite rule that turns the scoring into a go, conditional go, narrow, defer or no-go decision the utility can defend.

Energy Compliance, Inc. Professional Reference

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Pursuit decisions on a specific opportunity should be reviewed against the actual Notice of Funding Opportunity (NOFO), Funding Opportunity Announcement (FOA), or program solicitation, and against the utility's own strategic, financial, and operational position. Program parameters change, sometimes between one funding round and the next. Confirm every threshold and requirement against the active NOFO or FOA language and current agency policy before relying on it.

References to the Uniform Guidance in this edition were checked against 2 CFR Part 200 as published in the Electronic Code of Federal Regulations (current through October 15, 2026), and references to Department of Energy cost-sharing rules against 2 CFR Part 910. Statements about executive orders and Department of Energy policy were checked against the sources listed in Sources and Authorities on October 17, 2026.

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Foreword

A funded energy project that goes sideways after award can often trace its failure to a pursuit decision that should have gone the other way. The opportunity is real and the eligibility is clean, so the narrative writes itself. The team gets excited, the application goes in, and the award lands. Eighteen months later the project is carrying compliance overhead the utility was not built to absorb, a match commitment that has outrun the original financial assumption, or a stack of federal cross-cutting obligations that nobody fully understood at submission. By the time the consequences are visible, the next opportunity worth pursuing was already in front of a team busy cleaning up the last one.

This is the fourth reference in the Energy Compliance, Inc. Grant Funding Series. The first surfaces readiness gaps before any application. The second surfaces post-award compliance risk during the period of performance. The third drives documentation discipline for IRA credit positions. This one runs upstream of all of them. It is the pursuit decision filter. The question it answers is not whether an opportunity could be won. That's the wrong question. The question is whether the opportunity is worth winning, given the utility's actual position, capacity, and competing priorities.

It's written for utility decision-makers: the CEO, CFO and COO, the vice presidents of regulatory affairs and operations, the director of strategic planning, and the grants administrator carrying the recommendation up the chain. It is not written for the grant writer who will draft the application if the answer is yes. The pursuit decision belongs

upstream of drafting. Once the team is writing narrative, the decision has already been made, with all its downstream consequences.

My view is that the pattern holds. Utilities that pursue the right opportunities and decline the wrong ones build a portfolio of funded projects that strengthens their balance sheet and their operations. Utilities that pursue everything that looks pursuable build a portfolio that drains their compliance capacity, mortgages their match capital, and produces post-award fatigue. That fatigue eventually shows up as missed milestones, or as audit findings on projects that should have been declined at the front end.

This scorecard is built backward from that pattern. Seven dimensions, each with three or four explicit criteria. Each criterion is scored Green, Yellow, or Red, and a composite rule turns the scores into a recommendation: go, conditional go, narrow, defer, or no-go. The tool does not need the team to be right every time. It needs the team to apply the same lens to every opportunity, write the analysis down, and make a decision the utility can stand behind months later, when the consequences play out.

It is also the same diagnostic Energy Compliance, Inc. uses for opportunity evaluation under our Grant Readiness Assessment. The substance is identical. An engagement applies it to your specific opportunity, your strategic plan, and your operations, and ends with a written recommendation and the analysis behind it.

Rob Smith

Founder and Principal, Energy Compliance, Inc.

Executive Summary

A funding opportunity can be winnable and still be wrong for the utility. A poor pursuit decision gets expensive after award: match that outruns cash flow, federal procurement and reporting the organization was not staffed for, a period of performance that does not fit the project. This scorecard moves that reckoning to the front.

The scorecard evaluates an opportunity on seven dimensions:

1. **Eligibility Match.** Entity type, geography, and project type. A single Red here ends the pursuit.
2. **Strategic Fit.** Alignment with the utility's resource and system plans, its reliability position, its decarbonization or resilience direction, and its regulatory and stakeholder environment.
3. **Competitive Density.** What prior rounds actually funded, how demand compares with the funding available, and whether the utility can name real differentiators.
4. **Match Funding Capacity.** Whether cost share is identified, allowable under 2 CFR 200.306 and program rules, available when the project needs it, and approved by the body that has to approve it.
5. **Internal Administrative Capacity.** Grants administration, financial systems that track awards the way 2 CFR 200.302 requires, procurement under 2 CFR 200.317 through 200.327, and project management bandwidth.
6. **Post-Award Compliance Overhead.** The cross-cutting requirements attached to the specific award, any pass-through and subrecipient monitoring duties under 2 CFR 200.332, and whether the award pushes the utility over the \$1,000,000 single audit threshold in 2 CFR 200.501 (public power) or the DOE compliance audit threshold under 2 CFR 910.501 (for-profit recipients).
7. **Timeline Feasibility.** Time to prepare a competitive application, fit between the period of performance and the project schedule, and time for internal review and approval.

The practical points:

- Three dimensions gate the decision: Eligibility, Match, and Administrative Capacity. A Red on Eligibility is a no-go. A Red on Match or on Administrative Capacity caps the recommendation at Narrow, and Reds on both are a no-go.
- The composite rule runs in a fixed order, so every scorecard, together with the team's documented calls on mitigation and narrowing, produces exactly one recommendation, and every decision is written down.
- Federal policy has moved. Justice40 and DOE's Community Benefits Plan letter have both been withdrawn. Score against the current NOFO, not last cycle's checklist.

How to Use This Reference

Three steps. Run the scorecard once for each opportunity. Do not skip steps under deadline pressure.

Step one: score each criterion as it stands today. Green is earned, not assumed.

Yellow is the honest score when a criterion is partly met, or when the utility could close the gap with effort but has not done it yet. Red is the honest score when a criterion is materially unfavorable and the gap cannot be closed in the time available. Optimism in the scoring only delays the moment the consequences become visible.

Step two: roll the criteria up into dimension bands, then apply the composite rule.

Each chapter ends with the rule that turns its criteria into a Green, Yellow, or Red band for that dimension. Chapter 8 then applies the composite rule to the seven bands. The composite does not add the scores into a single number. It applies a band-based rule in a fixed order.

Step three: document the decision. Every pursuit decision should leave a written record: the completed scorecard, the reasoning behind each band, the recommendation, and the name of the person or body that made the decision. The record does two jobs. Over time it shows which dimensions best predict post-award outcomes at your utility. And it creates the accountability that separates disciplined pursuit from opportunistic pursuit.

1 Eligibility Match

Eligibility is the threshold question. If eligibility is not clean, no other dimension matters. The NOFO is where the answer lives. Appendix I to 2 CFR Part 200 requires every federal NOFO to carry an Eligibility section, and under 2 CFR 200.204(c)(1) that section must give a complete and specific list of the entity types eligible to apply. Read that section first.

1.1 Entity Type Eligibility

Why it matters

Federal energy programs restrict eligibility to defined entity types: municipal utilities, electric cooperatives, investor-owned utilities, public power entities, tribal utilities, independent power producers, industrial energy users, and others. Entity-type eligibility is usually stated plainly. The utility's classification under the program is either inside the eligible set or outside it.

Green. The utility is plainly within the eligible entity types the NOFO or FOA names. No interpretation is needed.

Yellow. The utility appears eligible, but the answer depends on how program language is read. Or eligibility depends on a structure, such as a consortium, a subrecipient relationship, or a choice between prime and sub roles, that has to be built deliberately.

Red. The utility is not within the eligible entity types, or eligibility would require a structural change the utility has not made.

1.2 Geographic Eligibility

Why it matters

Many federal energy programs carry geographic restrictions: a rural service area, a designated community or census tract, a state-level allocation, a regional designation, or tribal land. Geographic eligibility turns on where the project is, not where the utility is headquartered. A utility serving several areas can have eligible and ineligible projects under the same program.

Check the overlay against the current notice. The Justice40 overlay that appeared in many energy funding notices through 2024 has since been withdrawn. Executive Order 14008, which established the Justice40 Initiative, was revoked by Executive Order 14148 on January 20, 2025. A geographic test that was carried over from a prior round's template, and is not in the current NOFO, is not an eligibility criterion.

Green. The project location is plainly within the eligible geography, and documentation supporting the classification is in hand.

Yellow. The project location is partly within the eligible geography, or its status has been asserted but the supporting documentation has not been checked.

Red. The project location is outside the eligible geography, or the classification cannot be defended on documented data.

1.3 Project Type Eligibility

Why it matters

Programs restrict eligibility by project type, technology, scale, vintage, and ownership structure. A project that is the right technology in the right geography for the wrong program is still ineligible. The match has to be made against the eligible activities section of the NOFO or FOA, line by line.

Green. The project type is plainly within the eligible activities. Scale, technology, and structure all line up.

Yellow. The project type is partly aligned. Some elements clearly qualify. Others need interpretation or restructuring.

Red. The project type is not within the eligible activities, or making it fit would change the project's underlying purpose.

1.4 Scoring Dimension 1

Dimension 1 is **Red** if any of the three criteria is Red. A Red on Dimension 1 makes the whole opportunity a no-go, whatever the other six dimensions show. Dimension 1 is **Green** if all three criteria are Green, and **Yellow** otherwise.

Eligibility is the gate. There is no path to a defensible pursuit decision through an ineligible opportunity.

Scoring Note

A Yellow on eligibility is a question to send to the program office now, in writing, while the answer can still change the decision. Do not carry an open eligibility question into drafting and hope the reviewers read it your way.

2 Strategic Fit

The opportunity has to fit the utility's existing strategy. Funded projects that do not fit the strategic plan create operational drag even when they are executed well.

2.1 Integrated Resource Plan or System Plan Alignment

Why it matters

A utility's planning documents (the integrated resource plan, transmission plan, distribution plan, or resource adequacy plan) set out the resource and operating strategy the utility has committed to carry out. A funded project outside the plan creates regulatory friction, integration problems, and rate case exposure that can outweigh the value of the federal money.

Green. The project is explicitly in the current planning document, or is a natural extension of the plan's direction. Plan language can be quoted in the application narrative.

Yellow. The project sits next to the plan's direction. It does not contradict the plan, but the plan does not anticipate it.

Red. The project contradicts the plan, or could not be carried out responsibly without revising the plan.

2.2 Reliability and Resource Adequacy Position

Why it matters

Energy projects change reliability, resource adequacy, and operations. A funded project that improves reliability adds to the strategy. A funded project that complicates operations (intermittent output without firming, interconnection without integration planning, capacity without dispatch flexibility) imposes an operating cost that can exceed the funding benefit.

Green. The project improves reliability or resource adequacy without adding material operating complexity.

Yellow. The project is neutral, or adds complexity that documented operating changes can manage.

Red. The project adds operating complexity the utility is not prepared to manage, or degrades its reliability metrics.

2.3 Decarbonization or Resilience Direction

Why it matters

Federal energy programs set their own priorities, and those priorities shift with statute and administration. Read the merit review criteria in the current NOFO and score against them. Under 2 CFR 200.205 the agency must run its merit review against written standards, and the notice is where the applicant sees them. Where a program rewards decarbonization or resilience outcomes, a utility with a documented commitment in that direction brings substance an opportunistic application cannot match. A utility without that groundwork will struggle against applicants who have done it.

Green. The project advances a documented utility commitment on the outcomes the program's merit criteria reward. Existing commitments support the narrative.

Yellow. The project is consistent with general industry direction, but the utility's own commitment on those outcomes is thinly documented.

Red. The project does not line up with any documented utility commitment on the outcomes the program rewards.

2.4 Regulatory and Stakeholder Position

Why it matters

Funded projects often need regulatory approval (the state commission, FERC, local zoning) and stakeholder support (a city council, a board of directors, member-owners, ratepayer advocates). A pursuit decision that ignores the approval path produces delays that can run past the period of performance.

Green. Regulators and stakeholders are supportive, and approvals should be straightforward.

Yellow. Support is mixed. Approval is achievable but will take deliberate engagement.

Red. Regulators or stakeholders are unfavorable. Approval is uncertain, or would consume management attention out of proportion to the project.

2.5 Scoring Dimension 2

Dimension 2 is **Red** if two or more criteria are Red. It is **Green** if at least three of the four criteria are Green and none is Red. Every other pattern is **Yellow**.

Scoring Note

If the only place the project appears in the utility's planning documents is the grant application, that is the answer to 2.1.

3 Competitive Density

Federal energy programs are competitive. Funding runs out. Strong applications are declined when stronger ones come in.

3.1 Prior Round Award Pattern

Why it matters

Prior funding rounds show how the agency has actually used the program. Award announcements, selection notices, and program office presentations identify the project types, scales, applicants, and themes that have won. Applications that fit the demonstrated award pattern compete better than applications that do not. Watch for a break in the pattern: when the program's statutory basis or the agency's priorities change between rounds, the last round is a weaker guide to the next one.

Green. Prior awards include projects closely similar to the one under consideration. The pattern is favorable.

Yellow. Prior awards include some adjacent projects. The pattern is unclear, or program priorities have shifted since the last round.

Red. Prior awards include nothing similar, or they have favored applicants the utility cannot match in scale, sophistication, or theme.

3.2 Applicant Demand and Funding Available

Why it matters

Competitive density comes down to projected applicant demand against the funding available and the number of awards the notice anticipates. Programs with heavy demand against limited funding produce low award rates no matter how good an individual application is. A defensible pursuit decision does that arithmetic, not just an assessment of the project's merits.

Green. Available funding is high relative to projected demand. Multiple awards are anticipated.

Yellow. Funding and projected demand are roughly matched. The competition is real but winnable.

Red. Funding is low relative to projected demand. Even strong applications face a high decline rate.

3.3 Differentiator Inventory

Why it matters

Competitive applications win on differentiators, the elements that set a project apart from the field. A utility considering pursuit should be able to name three or four that a program officer would recognize. Pursuits without named differentiators produce applications that read as generic.

Green. The utility can name three or more credible differentiators specific to this project and this program.

Yellow. The utility can name one or two, but the field is likely to bring stronger ones.

Red. The utility cannot name anything that would set its application apart from the likely competition.

3.4 Scoring Dimension 3

Dimension 3 is **Red** if two or more criteria are Red. It is **Green** if at least two of the three criteria are Green and none is Red. Every other pattern is **Yellow**.

4 Match Funding Capacity

Many federal energy programs require non-federal cost share. For the Department of Energy's research, development, demonstration and commercial application awards, 2 CFR 910.130 sets the default floor: at least 20 percent for research and development, and at least 50 percent for demonstration and commercial application activities, unless an exclusion or a Secretary's determination reduces it. Other programs set their own levels in statute or in the NOFO. Match is a financial, regulatory, and strategic question all at once. Four criteria.

4.1 Match Source Identification

Why it matters

Match sources must be identified before the application goes in. They can include utility equity, ratepayer-recovered capital, state matching grants, third-party financing, foundation contributions, third-party in-kind contributions, and other non-federal sources. A source that exists only in the pursuit narrative, with no commitment behind it, cannot support a defensible match position.

Green. Match sources are identified and quantified. Committed capacity is enough to meet the program's requirement.

Yellow. Match sources are identified, but the commitments are contingent or partial. Closing the gap will take deliberate effort during the application window.

Red. Match sources are not identified, or the identified sources cannot realistically be assembled in time.

4.2 Match Allowability Under Program Rules

Why it matters

Not every non-federal dollar counts as match. Under 2 CFR 200.306(b), cost share must be verifiable in the recipient's records, not counted toward any other federal award, necessary and reasonable for the award's objectives, allowable under the cost principles in Subpart E, and in the approved budget when the agency requires it. Funds paid by the federal government under another award cannot be used unless the authorizing statute specifically allows it. In-kind contributions of services and property have to be valued under the cost principles (2 CFR 200.306(d) through (f)), and the Department of Energy adds its own rules for its awards in 2 CFR 910.130. Individual programs can narrow the list further. Match assembled without checking allowability produces a rejected application or a post-award disallowance.

Green. Match sources are confirmed allowable under 2 CFR 200.306 and the program rules, and documentation supports the determination.

Yellow. Match sources are likely allowable, but nobody has checked them against the current program rules.

Red. Match sources include items unlikely to be allowable, or allowability has not been looked at.

4.3 Match Liquidity and Timing

Why it matters

Match has to be available when the project needs it, not just in total across the period of performance. Read the award terms for how cost share is expected to track federal draws, and build the cash flow to that. Match that exists on paper but is illiquid or back-loaded produces draw constraints and cash flow stress during construction.

Green. Match is liquid, or will become liquid on a schedule that fits the project's cash needs.

Yellow. Match is identified, but its timing will need active management during construction.

Red. Match is back-loaded relative to the project's cash needs, or its liquidity is uncertain.

4.4 Match Approval Authority

Why it matters

Match commitments often need approval from the utility board, the city council, the cooperative membership, or another governing body. Match included in an application without those approvals creates post-award commitments the utility may not be authorized to keep.

Green. The commitment is within existing approval authority, or the required approvals can be obtained on the application timeline.

Yellow. The commitment needs an approval that is achievable but will take management attention.

Red. The commitment needs an approval the utility cannot realistically obtain in the time available.

4.5 Scoring Dimension 4

Dimension 4 is **Red** if two or more criteria are Red, or if Match Source Identification (4.1) is Red. It is **Green** if at least three of the four criteria are Green and none is Red. Every other pattern is **Yellow**.

Scoring Note

A match number that has not been through the body that has to approve it is a hope, not a commitment. Score 4.4 on the approval you have, not the approval you expect.

5 Internal Administrative Capacity

Federal awards require administrative capacity the utility either has or builds. When it is missing, the work lands on people who already have full-time jobs, and that is where audit findings and missed milestones start.

5.1 Grants Administration Function

Why it matters

Administering a federal award takes a grants function that can manage applications, payment requests, reporting, subrecipient monitoring where it applies, and closeout. Utilities without one tend to push the work onto finance or operations staff who lack federal award experience and do it slowly.

Green. An established grants administration function exists, with current federal award experience and demonstrated capacity.

Yellow. A function exists, but its capacity is limited, or it is staffed by people whose main jobs are elsewhere.

Red. There is no established function. Federal award administration would land on staff without the experience to manage it.

5.2 Financial System Award Tracking

Why it matters

Under 2 CFR 200.302(b), the recipient's financial management system has to identify every federal award received and expended, including the Assistance Listing title and number, the federal award identification number, the year of the award, and the awarding agency, and it has to disclose the financial results of each award accurately and completely. Financial reports use the federal government-wide data elements, which today means the Federal Financial Report (SF-425) under 2 CFR 200.328. A system that cannot track by award and cost category forces manual rework on every report and creates cost allowability exposure.

Green. The financial system tracks federal awards at the required level of detail, and reports come out cleanly.

Yellow. The system can produce the required reports, but only with manual rework.

Red. The system cannot track federal awards at the required level of detail without major reconfiguration.

5.3 Procurement Capacity Under Federal Rules

Why it matters

Procurement under a federal award carries its own standards. Under 2 CFR 200.317, a state or Indian Tribe follows its own procurement policies plus specified federal sections, and every other recipient and subrecipient, municipal and cooperative utilities included, must follow the procurement standards in 2 CFR 200.318 through 200.327. Those standards sit on top of state and local procurement law, and 2 CFR 200.318(a) requires documented procurement procedures consistent with both. Capacity to buy under the more demanding overlay has to exist or be built.

Green. The procurement function routinely buys under federal rules, and its standard documents already meet them.

Yellow. The function buys under state and local rules and could adapt, but has not done so on a recent federal award.

Red. The function would need material change to buy under federal rules, or procurement findings have occurred on prior awards.

5.4 Project Management Bandwidth

Why it matters

A funded project needs project management from initiation through closeout. Utilities running too many concurrent projects, or with project managers already at capacity, produce delays and milestone slippage that complicate post-award compliance.

Green. Project management bandwidth is available to absorb the project without compromising existing commitments.

Yellow. Bandwidth is tight. The project can be absorbed, but only by reprioritizing.

Red. Bandwidth is exhausted. The project would compete with existing commitments and would likely slip.

5.5 Scoring Dimension 5

Dimension 5 is **Red** if two or more criteria are Red. It is **Green** if at least three of the four criteria are Green and none is Red. Every other pattern is **Yellow**.

6 Post-Award Compliance Overhead

The compliance overhead that comes with an award is the obligation that surprises utilities at the worst possible moment. The pursuit decision should evaluate it explicitly.

6.1 Federal Cross-Cutting Compliance Profile

Why it matters

Federal energy awards carry overlays that vary by program and by funding source. Examples include environmental review under the National Environmental Policy Act, historic preservation review under the National Historic Preservation Act, the Build America, Buy America preference for infrastructure projects (implemented in 2 CFR Part 184), Davis-Bacon prevailing wage requirements, civil rights obligations, the lobbying certification under 31 U.S.C. 1352, and conflict of interest disclosure under 2 CFR 200.112. Davis-Bacon is a good example of why the profile has to be built for the specific opportunity. The Department of Energy's guidance states that Section 41101 of the Bipartisan Infrastructure Law applies Davis-Bacon wage requirements to construction, alteration, or repair on projects that law funds, with no broad exemption for utilities.

The profile also changes over time. Community Benefits Plans were required in many Department of Energy funding opportunities, and the Department has since marked its financial assistance letter on Community Benefits Plans rescinded. Build the inventory from the current NOFO and award terms during pursuit evaluation, not from a prior round's checklist, and not after the award.

Green. The cross-cutting profile for this opportunity has been inventoried, and it is manageable with the utility's existing capacity.

Yellow. The profile is partly known. Some elements would need new capacity, but they are manageable.

Red. The profile is heavy, and the utility lacks the experience or capacity to manage it.

6.2 Subrecipient Monitoring

Why it matters

When the utility will pass part of the award to another entity, it becomes a pass-through entity. It has to decide case by case whether each party is a subrecipient or a contractor (2 CFR 200.331), and for subrecipients it takes on the duties in 2 CFR 200.332: verifying the subrecipient is not excluded, identifying the subaward and its terms, and monitoring the subrecipient's activities, including reviewing its financial and performance reports and following up on deficiencies. Subrecipient monitoring is a specialized function that many utilities do not maintain today.

Green. No subrecipient relationships are contemplated, or subrecipient monitoring capacity already exists.

Yellow. Subrecipient relationships are contemplated, and monitoring capacity would have to be built or strengthened during the period of performance.

Red. Subrecipient relationships are central to the project, and the utility cannot monitor them effectively.

6.3 Single Audit Threshold

Why it matters

Under 2 CFR 200.501, a non-federal entity that expends \$1,000,000 or more in federal awards during its fiscal year must have a single audit, or a program-specific audit where that election is available. The 2024 revision of the Uniform Guidance, effective October 1, 2024, raised the threshold from \$750,000. The audit package is due within 30 calendar days after the auditee receives the auditor's report, or nine months after the end of the audit period, whichever is earlier (2 CFR 200.512). That rule covers municipal, cooperative and other public power utilities. It does not reach investor-owned utilities or independent power producers: 2 CFR 200.501(i) says Subpart F "does not apply to for-profit organizations." For DOE awards, a for-profit recipient falls under 2 CFR 910.501 instead, which requires a compliance audit. The regulation text sets that audit at \$750,000 in DOE expenditures, but DOE's class deviation (Policy Flash 2025-02, October 2, 2024) raised it to \$1,000,000 until DOE completes the rulemaking. A utility that is not subject to an audit today, and would be after accepting the award, takes on new audit work and the records to support it.

Green. The utility is already subject to single audit (or, for a for-profit DOE recipient, the 910.501 compliance audit) and has handled the audit cycle well.

Yellow. The utility would become subject to single audit or the 910.501 compliance audit and would need to engage an audit firm and build the supporting records.

Red. The utility is not prepared to meet single audit obligations (or, for a for-profit DOE recipient, the 910.501 compliance audit) on the timeline that would follow award acceptance.

6.4 Scoring Dimension 6

Dimension 6 is **Red** if two or more criteria are Red. It is **Green** if at least two of the three criteria are Green and none is Red. Every other pattern is **Yellow**.

Scoring Note

The cross-cutting profile is the part of the scorecard most likely to be stale. Build it from the notice in front of you. Requirements that were in last round's terms may be gone, and new ones may have taken their place.

7 Timeline Feasibility

The pursuit decision has to reckon with the time available before the submission deadline and the period of performance after award.

7.1 Application Preparation Timeline

Why it matters

A competitive federal energy application takes focused work across several disciplines: technical, financial, environmental, legal, and narrative. Estimate the hours honestly against the people who will do them. Applications prepared on a compressed timeline often lack the substance to compete, and they burn the same staff hours as an application that could have won.

Green. The timeline allows qualified internal or external staff to develop the application properly, with time for internal review cycles.

Yellow. The timeline is compressed but achievable with focused staffing.

Red. The timeline is materially too short. The application would compete against others with far more preparation behind them.

7.2 Period of Performance Feasibility

Why it matters

The period of performance is the interval between the start and end dates of the award (2 CFR 200.1), and it has to fit the project schedule. A period that is too short forces compressed construction, with the cost and quality risk that comes with it. A period that does not match the project's sequencing produces missed milestones and a dependence on extensions. Where the award terms authorize it, 2 CFR 200.308(g)(2) lets a recipient initiate a one-time extension of up to 12 months without prior approval, unless one of the listed conditions applies, on written notice at least 10 calendar days before the period ends. Further no-cost extensions need the agency's approval. Do not plan a project around an extension you have not been granted.

Green. The period of performance fits the project schedule with reasonable contingency for delay.

Yellow. The period is feasible but needs disciplined execution. Contingency is thin.

Red. The period is materially shorter than the project needs. An extension would be required and is not assured.

7.3 Internal Review and Approval Timeline

Why it matters

Submission requires internal review and approval through the utility's chain: technical, financial, legal, and executive, plus the board or governing body where required. Pursuit decisions that ignore the approval timeline produce submissions made without proper authorization, or submissions that miss the deadline.

Green. Internal review and approval fit the submission schedule.

Yellow. Internal review and approval would compress against the schedule. Achievable with deliberate scheduling.

Red. Internal review and approval cannot realistically be completed in the time available.

7.4 Scoring Dimension 7

Dimension 7 is **Red** if two or more criteria are Red. It is **Green** if at least two of the three criteria are Green and none is Red. Every other pattern is **Yellow**.

8 The Composite Pursuit Decision

With each of the seven dimensions banded Green, Yellow, or Red, the composite rule turns the pattern into a recommendation.

8.1 The Gating Dimensions

Three dimensions gate the decision: Eligibility (1), Match Funding Capacity (4), and Internal Administrative Capacity (5). A Red on Eligibility is a no-go. A Red on Match or on Administrative Capacity caps the recommendation at Narrow, and Reds on both are a no-go. Strong projects with strong narratives fail after award when the eligibility, the match, or the capacity underneath them is not there. The rule reflects that.

8.2 Composite Bands

Apply the rules in the order listed. The first rule that fits the scorecard is the recommendation.

Order	Composite Band	Decision Rule
1	NO-GO	Dimension 1 (Eligibility) is Red; or three or more dimensions are Red; or Dimensions 4 (Match) and 5 (Administrative Capacity) are both Red
2	GO	Five or more dimensions are Green and no dimension is Red
3	CONDITIONAL GO	Four or more dimensions are Green; no more than one dimension is Red, and that Red is not Dimension 1, 4, or 5; any Red has a documented mitigation plan
4	NARROW	One or two dimensions are Red, and narrowing the project scope, deferring scope elements, or restructuring the application could clear them. A single Red on Dimension 4 or 5 lands here when narrowing could clear it. If narrowing cannot, rule 5 or the no-go fallback below applies
5	DEFER	No dimension is Red but fewer than four are Green; or narrowing cannot clear the Reds, but the gaps could realistically be closed before a future round

If narrowing cannot clear the Reds and the gaps cannot realistically be closed before a future round, the recommendation is no-go.

8.3 Decision Authority by Band

- **GO.** Standard pursuit authority. Application preparation proceeds, and the internal review schedule is locked.

- **CONDITIONAL GO.** The executive sponsor reviews the documented mitigation plan for the Red, or, where there is no Red, the actions to move the Yellow dimensions. Pursuit proceeds with named owners for each mitigation action.
- **NARROW.** The application scope is adjusted to address the Red dimensions, and the opportunity is re-scored. Proceed only if the revised scoring reaches at least Conditional Go.
- **DEFER.** The decision is recorded in writing, and a date is set to re-evaluate against the next available round.
- **NO-GO.** The decision is recorded in writing with the dimensions and criteria that drove it, and communicated to internal stakeholders so it is not re-litigated.

8.4 Scoring Worksheet

Use one worksheet per opportunity. Record the dimension band, the criteria scores behind it, and the composite result.

Dimension	Green	Yellow	Red	Criteria Scores
1. Eligibility Match	☐	☐	☐	1.1 _ 1.2 _ 1.3 _
2. Strategic Fit	☐	☐	☐	2.1 _ 2.2 _ 2.3 _ 2.4 _
3. Competitive Density	☐	☐	☐	3.1 _ 3.2 _ 3.3 _
4. Match Funding Capacity	☐	☐	☐	4.1 _ 4.2 _ 4.3 _ 4.4 _
5. Internal Administrative Capacity	☐	☐	☐	5.1 _ 5.2 _ 5.3 _ 5.4 _
6. Post-Award Compliance Overhead	☐	☐	☐	6.1 _ 6.2 _ 6.3 _
7. Timeline Feasibility	☐	☐	☐	7.1 _ 7.2 _ 7.3 _
Composite band				
Pursuit recommendation				
Decision made by, and date				

8.5 A Pursuit Decision Is a Strategic Decision

Not every funded opportunity is worth pursuing. The ones worth pursuing are those where the project, the utility, and the program line up on enough dimensions that the post-award period strengthens the utility instead of draining it. The scorecard shows that alignment, or its absence, before the pursuit work begins.

Scoring Note

A no-go recorded in writing is a finished piece of work. It frees the team for the opportunity that does fit, and it keeps the same weak opportunity from coming back every quarter dressed as a new one.

Glossary of Terms

Term	Meaning in this paper
Assistance Listing	The public listing of federal assistance programs managed by the General Services Administration at SAM.gov. Each listing has a unique Assistance Listing number, which a recipient's financial system must use to identify its awards (2 CFR 200.1, 200.302).
Build America, Buy America (BABA)	The Buy America preference in the Infrastructure Investment and Jobs Act for iron, steel, manufactured products, and construction materials incorporated into federally funded infrastructure projects. OMB's implementing guidance is 2 CFR Part 184.
Composite band	The single recommendation the scorecard produces from the seven dimension bands: go, conditional go, narrow, defer, or no-go.
Cost sharing (match)	The portion of project costs not paid by federal funds, unless a federal statute authorizes otherwise. Matching refers to a required level of cost share (2 CFR 200.1, 200.306).
Davis-Bacon Act (DBA)	The federal prevailing wage law. The Department of Energy's guidance states that Section 41101 of the Bipartisan Infrastructure Law applies Davis-Bacon wage requirements to construction, alteration, or repair work on projects that law funds.
Dimension band	The Green, Yellow, or Red score for one of the seven dimensions, derived from its criteria by the scoring rule at the end of each chapter.
Federal Financial Report (SF-425)	The OMB-approved government-wide form for recipient financial reporting under 2 CFR 200.328.
Funding Opportunity Announcement (FOA)	The term the Department of Energy has used for its notices of funding opportunity.
Gating dimension	Eligibility, Match Funding Capacity, or Internal Administrative Capacity. A Red on any of them caps the composite recommendation at Narrow or ends the pursuit.
Notice of Funding Opportunity (NOFO)	A formal announcement that federal funding is available through a financial assistance program. It sets out who is eligible, the evaluation criteria, the required application components, and how to apply (2 CFR 200.1, 200.204).
Pass-through entity	A recipient or subrecipient that provides a subaward to a subrecipient to carry out part of a federal program (2 CFR 200.1). Its duties are in 2 CFR 200.332.
Period of performance	The time between the start and end dates of a federal award, which may include one or more budget periods (2 CFR 200.1).

Term	Meaning in this paper
Single audit	The audit required under 2 CFR Part 200, Subpart F, for a non-federal entity that expends \$1,000,000 or more in federal awards in its fiscal year (2 CFR 200.501).
Subrecipient	An entity that receives a subaward from a pass-through entity to carry out part of a federal award. It does not include a beneficiary or participant (2 CFR 200.1).
Third-party in-kind contribution	The value of non-cash contributions of property or services that benefit a federally funded project and are contributed by non-federal third parties without charge (2 CFR 200.1). Valuation follows 2 CFR 200.306.
Uniform Guidance	OMB's Guidance for Federal Financial Assistance at 2 CFR Part 200, most recently revised effective October 1, 2024. The Department of Energy adopts it, with additions, in 2 CFR Part 910. OMB has proposed a rewrite, the Regulation for Federal Financial Assistance (91 FR 32198, May 29, 2026); comments closed July 13, 2026, and it was not final as of October 18, 2026, so the thresholds and section numbers cited here could move.

How Energy Compliance Can Help

This scorecard is the front end of the work we do with utilities on federal funding. If an opportunity is on your desk and the scoring is not obvious, these are the places our team helps most.

Grant Readiness Assessment. We run the seven dimensions against your specific opportunity, your plans, and your organization, and deliver a written pursuit recommendation with the analysis behind it. That includes reading the current NOFO for what it actually requires today, which is where stale templates do the most damage.

Post-Award Compliance Administration. If the answer is go, the obligations in Chapters 5 and 6 start on award day. We build the compliance obligation matrix, set the reporting cadence, stand up subrecipient monitoring where the award calls for it, and get the records ready for single audit.

Compliance program support for funded assets. A funded generation or storage project that becomes a NERC-registered asset brings NERC obligations along with the federal ones. We handle registration and applicability analysis, RSAW narratives, and audit preparation for those assets.

WattOps Compliance. WattOps Compliance is EC's NERC compliance evidence platform, at wattopscompliance.com. If a funded asset will carry NERC obligations, we will run one standard at one of your facilities through WattOps at no cost so you can see what maintained evidence looks like. CIP standards are excluded from that offer.

RenewOps. A funded renewable or storage asset owes performance reporting for years after award. RenewOps, EC's renewable operations monitoring and analytics platform (with a Data Center module), holds the operating data those reports are built from.

If you have an opportunity in front of you, send me the notice and your first-pass scores, and I will tell you where I think the scorecard lands. Website: energycomplianceinc.com · Email: rsmith@complianceforenergy.com · Phone: 763.438.4427

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

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The views expressed in this publication do not represent the views of any federal or state agency, NERC, or any Regional Entity.

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, IRA tax credit documentation, and federal grant administration under 2 CFR 200.

Our position is compliance-first. Grant writers pursue awards. We build the documentation, audit trail, and obligation matrix that have to survive post-award scrutiny.

Our funding and regulatory services are organized in seven packages:

- **Grant Readiness Assessment.** Pre-application diagnostic and gap closure, including opportunity evaluation and pursuit decision support.
- **Energy Funding and Grant Application Support.** Application strategy, narrative development, 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 tax credits, bonus credit stacking, direct pay, and transferability.
- **Utility Regulatory and Legal Support.** FERC, state commission, 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 for engineering, EPC, and owner's engineer firms.

EC also builds the tools behind that work: WattOps Compliance, our NERC compliance evidence platform, and RenewOps, our renewable operations monitoring and analytics platform.

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Sources and Authorities

Uniform Guidance and agency regulations

- OMB, Guidance for Federal Financial Assistance, 2 CFR Part 200, eCFR, current through October 15, 2026. <https://www.ecfr.gov/current/title-2/part-200>
- OMB, Guidance for Federal Financial Assistance, 89 Fed. Reg. 30046 (April 22, 2024), effective October 1, 2024. <https://www.federalregister.gov/documents/2024/04/22/2024-07496/guidance-for-federal-financial-assistance>
- OMB, Buy America Preferences for Infrastructure Projects, 2 CFR Part 184. <https://www.ecfr.gov/current/title-2/part-184>
- DOE, 2 CFR Part 910, including Section 910.130 (cost sharing). <https://www.ecfr.gov/current/title-2/part-910>
- 31 U.S.C. 1352, Limitation on use of appropriated funds to influence certain Federal contracting and financial transactions. <https://www.govinfo.gov/link/uscode/31/1352>. See also 2 CFR 200.450. <https://www.ecfr.gov/current/title-2/section-200.450>

Executive orders

- Executive Order 14008, Tackling the Climate Crisis at Home and Abroad, 86 Fed. Reg. 7619 (February 1, 2021), Section 223 (Justice40 Initiative). <https://www.federalregister.gov/documents/2021/02/01/2021-02177/tackling-the-climate-crisis-at-home-and-abroad>
- Executive Order 14148, Initial Rescissions of Harmful Executive Orders and Actions (January 20, 2025), Section 2(s), revoking EO 14008. <https://www.govinfo.gov/link/cpd/executiveorder/14148>

Department of Energy guidance

- DOE, PF 2025-02, Class Deviation to 2 CFR 910.501 Audit Requirements for For-Profit Organizations (October 2, 2024). <https://www.energy.gov/node/4845564>
- DOE, PF 2024-16 (FAL 2024-02), Use of Community Benefits Plan (CBP) in Financial Assistance Programs (marked Rescinded; accessed October 17, 2026). <https://www.energy.gov/management/pf-2024-16-fal-2024-02-use-community-benefits-plan-cbp-financial-assistance-programs>
- DOE, Davis-Bacon Act Compliance Guide for Utilities (August 2024). <https://www.energy.gov/infrastructure/articles/dba-compliance-guide-utilities>