



GRANT FUNDING SERIES · FEDERAL ENERGY
AWARDS · EC-WP-904

Grant-Funded Audit File Architecture

A nine-layer documentation architecture for federally funded energy projects from acceptance through closeout.

Audits of federal energy awards are won or lost in the file structure. This reference lays out nine documentation layers, from the award stack to closeout, each with its document inventory, a naming convention that survives staff turnover, the retention rule under 2 CFR 200.334, and the failure pattern auditors find when the layer is built informally. A scored self-assessment closes the paper.

Energy Compliance, Inc. Professional Reference

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Disclaimer & Legal Notice

This document is a structural reference for the documentation architecture that supports federally funded energy projects under 2 CFR Part 200 and program-specific terms and conditions. It is not legal counsel, an audit opinion, or a substitute for guidance from qualified single audit firms, counsel, or program officers on a specific award or audit response.

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), which reflects the revision effective October 1, 2024. Department of Energy references were checked against 2 CFR Part 910 and the DOE policy flashes listed in Sources and Authorities on October 18, 2026. OMB has proposed a rewrite of the Uniform Guidance (91 FR 32198, May 29, 2026) that was not final on that date. Section numbers and thresholds cited here could move when it is.

Retention periods, prior-approval rules, and closeout deadlines can be modified by the terms and conditions of a specific award or by written notice from the awarding agency or pass-through entity. Confirm them against your award documents before relying on them.

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Foreword

Three decades on the regulatory and compliance side taught me that an audit is won or lost in the file structure, not in the substance of the underlying compliance. The compliance might be airtight. The cost might be perfectly allowable. The procurement might have followed every rule. None of that matters to the examiner if the file cannot produce the documentation on request, in a form that shows the discipline existed at the time instead of being assembled under audit pressure.

This is the fifth reference in the Energy Compliance, Inc. Grant Funding Series. The first surfaces readiness before applications go in. The second surfaces post-award compliance risk during the period of performance. The third drives IRA credit documentation discipline. The fourth filters pursuit decisions before applications go forward. This one is the architectural reference for the file system that holds the documentation the other four address. It is written for the grants administrator, controller, project manager, or compliance officer who owns the document architecture of one or more federal awards.

Here is how it plays out. Recipients with strong compliance substance and weak file architecture lose findings they would have won with better architecture. The auditor asks for the procurement decision file on Contract A. The team produces a folder with some emails, an invoice, a copy of the contract, and a note that "the evaluation was conducted by the procurement committee." The auditor asks for the evaluation memorandum. Nobody can produce it, because no one wrote one or because it sits in

the email of someone two staff transitions gone. The finding is not about the procurement decision. It is about the missing documentation behind the decision. The decision might have been sound. Without the architecture to show it, soundness is unprovable.

The reference is built on nine layers. Each is a category of documentation that 2 CFR Part 200 and program terms presuppose, and each carries its own document inventory, naming conventions that survive staff transitions, retention rules under 2 CFR 200.334, and the failure pattern that shows up when the layer is built informally or not at all. In my view, this is the file structure that holds up under examination, whether the recipient is a municipal utility, an electric cooperative, an IPP, or an industrial recipient.

It is the same architecture Energy Compliance, Inc. uses in its Post-Award Compliance Administration engagement. The substance is identical. The engagement applies it to your specific awards and builds the files and supporting SOPs in your environment. Either way, the nine layers below are the right nine.

Rob Smith

Founder and Principal, Energy Compliance, Inc.

Executive Summary

Federal award audits rarely turn on whether the work was done right. They turn on whether the file can prove it. Single auditors, program officers, and Inspectors General test documentation, and a recipient that cannot produce a record on request gets a finding even when the underlying decision was sound.

This reference organizes an award file into nine layers:

1. **Award documents.** The Notice of Award, terms and conditions, approved scope and budget, and every modification.
2. **Financial documentation.** General ledger detail, SF-425 reports and their reconciliations, payment draws, indirect cost basis, and cost share.
3. **Procurement documentation.** One decision file per procurement, built to the record standard in 2 CFR 200.318(i).
4. **Subrecipient documentation.** Determinations, risk evaluations, monitoring, and management decisions under 2 CFR 200.331 and 200.332.
5. **Performance reporting.** The work plan, reports, milestone evidence, and prior approvals for scope changes.
6. **Property and equipment.** Property records, biennial inventories, and disposition files under 2 CFR 200.311 through 200.316.
7. **Personnel and labor.** Personnel expense documentation under 2 CFR 200.430(g), plus Davis-Bacon and, where IRA credits are claimed, apprenticeship records.
8. **Cross-cutting compliance.** NEPA, Section 106, Build America, Buy America, civil rights, lobbying, debarment, and any program-specific overlays.
9. **Closeout.** The final reports due within 120 calendar days, property accounting, unobligated balance refunds, and the records transition that starts the retention clock.

Each layer chapter lists what belongs in the layer, gives naming conventions, states the retention rule, and describes the failure patterns auditors find most often. Chapter 10 provides a scored self-assessment: four standards per layer, a 0 to 72 scale, and three strength bands that tell you whether to maintain, remediate, or rebuild.

Three points from the current rules deserve attention up front. The baseline retention period under 2 CFR 200.334 is three years from submission of the final financial report, and agencies may not add other retention requirements beyond the exceptions that section lists. Property and equipment records run three years after final disposition, not three years after closeout. And the single audit threshold is now \$1,000,000 in federal expenditures, with DOE applying the same \$1,000,000 threshold to for-profit compliance audits through a class deviation.

How to Use This Reference

Three steps, then the scored self-check in Chapter 10.

Step One. Map your current file structure against the nine layers. For each active award, identify whether each layer exists in your file system. Treat layers that exist only informally (scattered across personal drives, email accounts, or project management software) as missing until they are moved into an institutionally owned structure. The architecture is not what you intended to build. It is what the next staff member could navigate without your help.

Step Two. Build the missing layers using the naming conventions in this reference. Naming conventions are not cosmetic. They keep documents findable after staff turnover, and they create the audit trail showing the discipline existed when the documents were created. Adopt one convention and use it across all awards.

Step Three. Lock retention through the applicable period. 2 CFR 200.334 sets the baseline at three years from the date of submission of the final financial report, with the exceptions summarized in Section 1.4. Lock retention in your records system, because a document lost before its period closes is no defense, whatever the reason.

1 Layer 1: Award Documents

The foundational layer. Everything else in the file refers back to it, and without it the rest of the file cannot be navigated.

1.1 Why This Layer Exists

Every federal award is governed by a stack of documents: the Notice of Award (NOA), the program's terms and conditions, the approved scope and budget, the applicable Notice of Funding Opportunity language, and every modification issued during the period of performance. Together they are the legal substance of what the recipient agreed to do, how the federal government agreed to fund it, and which compliance overlays apply. Every dispute that comes up during the period of performance is resolved against this layer. A recipient that cannot produce the complete award stack on request tells the auditor that its compliance program is not anchored to the actual award.

1.2 Documents That Belong in This Layer

- Notice of Award (NOA) or equivalent agency award letter
- Award terms and conditions, as issued and as modified
- Approved scope of work and project narrative
- Approved budget, broken into federal cost categories
- Approved budget narrative and justification
- Notice of Funding Opportunity (NOFO) or Funding Opportunity Announcement (FOA), as it existed at submission
- Application package as submitted, including all attachments
- Pre-award negotiation correspondence
- All award modifications, including no-cost extensions, scope modifications, and budget reallocations
- Program-specific cross-cutting policies referenced in the terms and conditions

1.3 Naming Convention Examples

A convention that carries the award identifier, document type, version, and date keeps the file navigable across years and staff transitions.

- `[AwardID]\_NOA\_Original\_YYYY-MM-DD.pdf`
- `[AwardID]\_TermsConditions\_v1\_YYYY-MM-DD.pdf`
- `[AwardID]\_TermsConditions\_v2\_Modified\_YYYY-MM-DD.pdf`
- `[AwardID]\_ApprovedBudget\_Baseline\_YYYY-MM-DD.xlsx`
- `[AwardID]\_Modification\_001\_YYYY-MM-DD.pdf`
- `[AwardID]\_NOFO\_AsSubmitted\_YYYY-MM-DD.pdf`

1.4 Retention Rules

The callout below carries the full 2 CFR 200.334 rule. The Layer 1 point is narrower: when the agency or pass-through entity extends the retention period in writing, file that notice here with the award documents and follow it.

Retention at a Glance (2 CFR 200.334)

Baseline: three years from submission of the final financial report (or the quarterly or annual report, for awards renewed quarterly or annually). Litigation, claims, or audit findings started before the period expires: until resolved and final action is taken. Written extension from the agency, pass-through entity, or cognizant agency: as the notice states. Property and equipment: three years after final disposition. Indirect cost rate proposals and cost allocation plans: three years from submission, or from the end of the fiscal year covered if not submitted. Federal agencies and pass-through entities may not impose other retention requirements beyond these exceptions.

1.5 Failure Pattern

The most common Layer 1 failure is incomplete modification tracking. The recipient keeps the original Notice of Award but cannot produce the full modification history. Modifications that adjusted scope, budget, period of performance, or reporting cadence end up in email or in the project manager's personal files. When the auditor reconciles activity to the current authorized scope and budget, the reconciliation fails, because the baseline it should be measured against is not in the file.

A related failure: the recipient produces the NOA but not the underlying terms and conditions, particularly the program-specific policies that govern environmental review, labor standards, civil rights, and other overlays. The NOA references them, but they are housed separately. Without them, the compliance obligations cannot be reconstructed from the file alone.

2 Layer 2: Financial Documentation

This layer drives every cost-allowability and reporting examination.

2.1 Why This Layer Exists

Federal awards require accounting that tracks expenditures by award, by Assistance Listing Number (ALN), by cost category, by period of performance, and often by sub-project or task code. Federal Financial Reports (SF-425), payment requests and draws (for example, through the Automated Standard Application for Payments, ASAP), indirect cost rate documentation, cost share records, and the supporting general ledger detail all live here. Every cost charged to the award must trace from the SF-425 down to the general ledger entry and back up through the cost allocation methodology. Without that trace, no cost-allowability position can be defended.

This is also the layer the single auditor starts from. A non-federal entity that expends \$1,000,000 or more in federal awards during its fiscal year must have a single or program-specific audit for that year (2 CFR 200.501). For-profit organizations fall outside the Single Audit Act, but DOE requires compliance audits of for-profit recipients under 2 CFR 910.501. That regulation still reads \$750,000. DOE's class deviation in Policy Flash 2025-02 raised the for-profit threshold to \$1,000,000, and Policy Flash 2025-20 confirms it applies to fiscal years beginning on or after October 1, 2024, until DOE revises Part 910 by rulemaking.

2.2 Documents That Belong in This Layer

- General ledger detail for the award, segmented by ALN and award identifier
- Cost ledger or job cost detail, segmented by cost category (personnel, fringe, travel, supplies, equipment, contractual, construction, other, indirect)
- Every SF-425 submitted, with its supporting reconciliation workpaper
- Payment requests and draws, supporting documentation, and bank deposit confirmations
- Cash management records showing that advances were limited to the minimum amounts needed and timed as close as is administratively feasible to the actual disbursements, as 2 CFR 200.305(b)(1) requires for recipients other than States (States follow their Treasury-State CMIA agreements under 31 CFR Part 205)
- Indirect cost documentation: the Negotiated Indirect Cost Rate Agreement (NICRA), the election of the de minimis rate (up to 15 percent of modified total direct costs under 2 CFR 200.414(f)), or the cost allocation plan
- Cost share documentation, including valuations of in-kind contributions
- Cost allowability determinations for material expenditures
- Allocation methodology documentation for shared costs
- Final financial reconciliation at closeout

2.3 Naming Convention Examples

- `[AwardID]\_GL\_YYYY-Qn.xlsx`
- `[AwardID]\_SF425\_YYYY-Qn\_AsSubmitted\_YYYY-MM-DD.pdf`
- `[AwardID]\_SF425\_YYYY-Qn\_ReconciliationWorkpaper\_YYYY-MM-DD.xlsx`
- `[AwardID]\_PaymentDraw\_NNN\_YYYY-MM-DD.pdf`
- `[AwardID]\_NICRA\_v1\_YYYY-MM-DD.pdf` (or
`[AwardID]\_IndirectDeMinimisElection\_YYYY-MM-DD.pdf`)
- `[AwardID]\_CostShare\_SourceName\_Commitment\_YYYY-MM-DD.pdf`

2.4 Retention Rules

Financial records carry the baseline three years from submission of the final financial report under 2 CFR 200.334, extended for unresolved litigation, claims, or audit findings. Indirect cost rate proposals, cost allocation plans, and similar rate computations have their own clock under 2 CFR 200.334(f): three years from the date of submission if they were submitted for negotiation, or from the end of the fiscal year they cover if they were not.

2.5 Failure Pattern

The most common Layer 2 failure is an SF-425 that no longer reconciles to the general ledger. The report was filed with numbers that matched the data available at the time. The ledger was later adjusted for corrections, late entries, or reclassifications. The reconciliation between the as-filed SF-425 and the current ledger no longer holds, and the recipient cannot produce the workpaper that supported the filed number. The auditor flags the discrepancy and the recipient explains the corrections. The costs may be fine. The missing workpaper is what gets written up.

A second failure: the indirect cost basis lives in the finance director's email instead of the award file. The de minimis election was made verbally at award acceptance and never written down. When the auditor asks for the indirect rate basis, the team reconstructs it from memory. The reconstruction may hold up on substance, but the missing record creates an internal control finding that ripples through the audit conclusion.

3 Layer 3: Procurement Documentation

In my view, procurement is the highest-risk layer on federal awards. Procurement documentation is hard to maintain and easy to lose.

3.1 Why This Layer Exists

2 CFR 200.317 through 200.327 set the procurement standards for purchases under a federal award: documented procedures, conflict of interest standards, full and open competition, the right procurement method, and required contract provisions. The record requirement is explicit. Under 2 CFR 200.318(i), the recipient must keep records sufficient to detail the history of each procurement, including the rationale for the method, the contract type selection, the contractor selection or rejection, and the basis for the contract price. The procurement decision file is that record.

The procurement methods themselves are set by 2 CFR 200.320: informal methods for micro-purchases and simplified acquisitions, formal methods (sealed bids or proposals) above the simplified acquisition threshold, and noncompetitive procurement, which is allowed only in the circumstances listed in 200.320(c), such as a requirement that only a single source can fulfill, a public exigency or emergency, or written approval from the agency or pass-through entity.

3.2 Documents That Belong in This Layer

- Procurement method selection worksheet and rationale (micro-purchase, simplified acquisition, sealed bids, proposals, or noncompetitive)
- Solicitation documents (RFP, IFB, RFQ, or equivalent)
- Distribution list and public notice documentation
- All responses received from offerors
- Evaluation memorandum documenting the basis for award
- Noncompetitive procurement justification citing the specific circumstance in 2 CFR 200.320(c), where applicable
- Conflict of interest disclosures from staff involved in the procurement, under the written standards of conduct required by 2 CFR 200.318(c)
- Executed contract or purchase order
- All contract modifications with justifications
- Contractor performance documentation, where the contract requires it
- The applicable Appendix II contract provisions, as 2 CFR 200.327 requires
- Davis-Bacon and other applicable flow-down clauses in subcontracts

3.3 Naming Convention Examples

One procurement decision file per procurement, with sub-folders for each element.

- `[AwardID]\_Procurement\_[ContractID]\_MethodSelection\_YYYY-MM-DD.pdf`
- `[AwardID]\_Procurement\_[ContractID]\_Solicitation\_YYYY-MM-DD.pdf`
- `[AwardID]\_Procurement\_[ContractID]\_Response\_VendorName\_YYYY-MM-DD.pdf`
- `[AwardID]\_Procurement\_[ContractID]\_EvaluationMemo\_YYYY-MM-DD.pdf`
- `[AwardID]\_Procurement\_[ContractID]\_NoncompetitiveJustification\_YYYY-MM-DD.pdf`
(where applicable)
- `[AwardID]\_Procurement\_[ContractID]\_ConflictDisclosures\_YYYY-MM-DD.pdf`
- `[AwardID]\_Procurement\_[ContractID]\_ExecutedContract\_YYYY-MM-DD.pdf`
- `[AwardID]\_Procurement\_[ContractID]\_Modification\_NNN\_YYYY-MM-DD.pdf`

3.4 Retention Rules

Procurement records carry the baseline three years from submission of the final financial report under 2 CFR 200.334, extended for unresolved litigation, claims, or audit findings. Where a procurement bought equipment or real property, keep the acquisition file with the property record in Layer 6, because those records run three years after final disposition. If you self-certify a micro-purchase threshold above the federal one under 2 CFR 200.320(a)(1)(iv), keep the annual self-certification documentation here as well.

3.5 Failure Pattern

The most common Layer 3 failure is the missing evaluation memorandum. The procurement was run. Offers came in. A decision was made, and the contractor was selected on legitimate grounds. No one wrote down the evaluation. The file holds the solicitation, the responses, and the executed contract, and the evaluation step is documented only by the award itself. The auditor records the absence as a finding even when the procurement was sound.

A second failure: noncompetitive justifications that recite the conclusion without the analysis. The justification says "this is a sole source procurement because the vendor is the only qualified provider," with no documented look at alternatives, no citation to the 200.320(c) circumstance, and no signature trail. It fails the substantive expectation, and a sole source decision that may have been justified goes into the audit report as unsupported.

A third failure: missing flow-down clauses in subcontracts. The prime contract includes the required Appendix II provisions. The subcontract is silent. The auditor walks the subcontract chain and flags the gap, and the fix usually means amending contracts in the middle of construction.

4 Layer 4: Subrecipient Documentation

This layer belongs to the pass-through entity, not the subrecipient. Subrecipient documentation failures land on the pass-through entity even when the subrecipient caused the underlying problem.

4.1 Why This Layer Exists

2 CFR 200.331 through 200.333 govern subrecipient monitoring and management. Section 200.331 makes the pass-through entity responsible for case-by-case determinations of whether an entity receiving federal funds is a subrecipient or a contractor. Section 200.332 then requires the pass-through entity to identify each subaward as a subaward with the required information, evaluate each subrecipient's fraud risk and risk of noncompliance, monitor the subrecipient's activities, issue management decisions on audit findings that pertain to the subaward, and verify that the subrecipient is audited as Subpart F requires. The subrecipient is responsible for its own compliance. The Layer 4 file documents how the pass-through entity carried out its own monitoring responsibility. Subrecipient failures that monitoring should have caught become pass-through entity findings, with the disallowance flowing up the chain.

4.2 Documents That Belong in This Layer

- Subrecipient versus contractor determination for each agreement, with documented rationale under 2 CFR 200.331
- Subrecipient risk evaluation under 2 CFR 200.332(c), including the factors considered and the rating assigned
- Executed subaward agreement, including the required subaward information and flow-down clauses
- Subaward budget, broken into federal cost categories
- Monitoring plan calibrated to the risk rating
- Desk review documentation
- On-site monitoring reports, where performed
- Subrecipient financial reports
- Subrecipient performance reports
- Subrecipient single audit reports, where required
- Management decisions on subrecipient audit findings that pertain to the subaward, issued within six months of the Federal Audit Clearinghouse's acceptance of the audit report (2 CFR 200.332(e)(3) and 200.521(d))
- Corrective action tracking for any findings affecting the pass-through award

4.3 Naming Convention Examples

- `[AwardID]\_SubR\_[SubRName]\_Determination\_YYYY-MM-DD.pdf`

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- `[AwardID]\_SubR\_[SubRName]\_RiskAssessment\_YYYY-MM-DD.pdf`
 - `[AwardID]\_SubR\_[SubRName]\_SubAwardAgreement\_Executed\_YYYY-MM-DD.pdf`
 - `[AwardID]\_SubR\_[SubRName]\_MonitoringPlan\_YYYY-MM-DD.pdf`
 - `[AwardID]\_SubR\_[SubRName]\_DeskReview\_YYYY-Qn.pdf`
 - `[AwardID]\_SubR\_[SubRName]\_SiteVisitReport\_YYYY-MM-DD.pdf`
 - `[AwardID]\_SubR\_[SubRName]\_SingleAuditReport\_FY-YYYY.pdf`
 - `[AwardID]\_SubR\_[SubRName]\_ManagementDecision\_YYYY-MM-DD.pdf`

4.4 Retention Rules

Subrecipient records carry the baseline three years from submission of the final financial report under 2 CFR 200.334. Subrecipient single audit reports and management decisions stay with the pass-through entity's file for the same period, and longer if a finding is still open.

4.5 Failure Pattern

The most common Layer 4 failure is the missing subrecipient versus contractor determination. The pass-through entity signed an agreement and treated the counterparty as a vendor. The substance of the relationship met the subrecipient characteristics in 2 CFR 200.331(a). No monitoring was done. The audit identifies the misclassification, and the absent monitoring becomes the finding regardless of how well the work was performed.

A second failure: subrecipient single audit reports are received and never reviewed. The pass-through entity files the report and moves on. The six-month management decision window passes. When the auditor asks for the management decisions on prior-year findings affecting the pass-through award, they do not exist. The underlying findings were the subrecipient's, but the pass-through entity is the one written up.

A third failure: the risk evaluation done at subaward initiation is never refreshed. The subrecipient's profile changes. New federal awards expand its exposure. The original rating goes stale, and monitoring continues at the original cadence even though the risk now calls for closer oversight.

5 Layer 5: Performance Reporting

This layer documents what the award accomplished against what it was authorized to accomplish. Performance documentation gaps surface at closeout and shape the agency's posture toward the recipient on future awards.

5.1 Why This Layer Exists

Federal awards require performance reporting against the approved scope and work plan. Performance reports document milestones achieved, deliverables completed, outcomes measured, and variances explained. They are the agency's primary view into the project. Reports that drift from the approved scope without prior approval, recite activity without evidencing outcomes, or cannot be cross-referenced to project documentation produce findings and erode the agency's confidence in the recipient.

5.2 Documents That Belong in This Layer

- Approved work plan and milestone framework, as originally approved and as modified
- Every performance report submitted, on the cadence the award requires
- Supporting documentation for each milestone or deliverable claimed
- Variance explanations and prior-approval documentation for any scope or schedule change
- Performance metrics and outcome measurement documentation
- Photographs, technical specifications, commissioning reports, and other evidence of physical deliverables
- Stakeholder engagement documentation, where the award terms require it
- Final performance report, with the full evidence package

5.3 Naming Convention Examples

- `[AwardID]\_WorkPlan\_Baseline\_YYYY-MM-DD.pdf`
- `[AwardID]\_WorkPlan\_Modified\_v2\_YYYY-MM-DD.pdf`
- `[AwardID]\_PerfReport\_YYYY-Qn\_AsSubmitted\_YYYY-MM-DD.pdf`
- `[AwardID]\_Milestone\_[MilestoneID]\_EvidencePackage\_YYYY-MM-DD.pdf`
- `[AwardID]\_Variance\_Explanation\_YYYY-MM-DD.pdf`
- `[AwardID]\_PriorApproval\_ScopeChange\_YYYY-MM-DD.pdf`
- `[AwardID]\_FinalPerfReport\_YYYY-MM-DD.pdf`

5.4 Retention Rules

Performance records carry the baseline three years from submission of the final financial report under 2 CFR 200.334. Where performance records also support a cost share valuation or program income reporting, keep them on the longer of the applicable clocks. Program income earned after the period of performance has its own rule in 2 CFR 200.334(e) when the award requires you to report it.

5.5 Failure Pattern

The most common Layer 5 failure is the generic performance report. It recites activity ("the project proceeded according to schedule," "the team continued execution of construction activities") without evidencing specific deliverables or outcomes. The reports went in on time and met the cadence requirement, but not the substantive one. When the auditor or program officer reads the cumulative reports against the approved scope, they do not support the conclusion that the scope was accomplished. The finding is on performance documentation discipline.

A second failure: scope changes happen during execution and are documented after the fact in a performance report, without prior approval. Under 2 CFR 200.308(f)(1), a change in the scope or objective of the project requires prior written approval from the agency or pass-through entity, even when no budget revision is involved. The change shows up in a report after the fact. The auditor identifies it as unauthorized. The fix usually means asking for retroactive approval, and that is not always granted.

6 Layer 6: Property and Equipment

This layer addresses the federal interest in property. Property and equipment findings carry repayment exposure that can surface years after the award has closed.

6.1 Why This Layer Exists

2 CFR 200.310 through 200.316 govern property acquired or improved with award funds. Real property must be used for the originally authorized purpose as long as it is needed for that purpose, and the recipient may not dispose of or encumber its interest in the meantime except as the agency allows (2 CFR 200.311(b)). Real property, equipment, and intangible property acquired or improved with the award are held in trust for the beneficiaries of the program, and the agency may require liens or other notices of record to show the federal interest (2 CFR 200.316). Property records for equipment must include a description, a serial or other identification number, the source of funding including the Federal Award Identification Number (FAIN), the title holder, acquisition date and cost, the percentage of federal participation, location, use and condition, and disposition data (2 CFR 200.313(d)(1)). A physical inventory must be reconciled to those records at least once every two years (2 CFR 200.313(d)(2)).

Property findings are expensive because disposition comes with a compensation rule. When equipment is no longer needed and has a current fair market value over \$10,000 per unit, the agency is entitled to its percentage share of the current market value or sale proceeds (2 CFR 200.313(e)(2)). Real property disposition requires instructions from the agency or pass-through entity, and each disposition method in 2 CFR 200.311(d) settles the federal share in dollars.

6.2 Documents That Belong in This Layer

- Property records with all the elements 2 CFR 200.313(d)(1) requires, including an identification number and the FAIN
- Property acquisition documentation (cross-reference to the procurement file, acquisition cost, date placed in service)
- Biennial physical inventory and reconciliation under 2 CFR 200.313(d)(2)
- Use documentation showing the property serves the authorized purpose
- Maintenance records for federally funded equipment
- Records of loss, damage, or theft investigations, and any notice to the agency
- Federal interest documentation on real property, including recorded liens or notices and any restrictions on conveyance, encumbrance, or change of use
- Disposition instructions and records under 2 CFR 200.313(e) and 200.311(d)
- Federal share calculations and remittance documentation for property sold, retained, or otherwise disposed of
- Transfer documentation where property moves between awards or to other federally supported activities

6.3 Naming Convention Examples

- `[AwardID]\_Property\_[AssetID]\_IDAssignment\_YYYY-MM-DD.pdf`
- `[AwardID]\_Property\_[AssetID]\_AcquisitionFile\_YYYY-MM-DD.pdf`
- `[AwardID]\_Property\_Inventory\_YYYY-YYYY\_Reconciliation.xlsx`
- `[AwardID]\_RealProperty\_FederalInterest\_YYYY-MM-DD.pdf`
- `[AwardID]\_Property\_[AssetID]\_Disposition\_YYYY-MM-DD.pdf`
- `[AwardID]\_Property\_[AssetID]\_FederalShareRemittance\_YYYY-MM-DD.pdf`

6.4 Retention Rules

This is the layer where the baseline clock does not apply. Records for property and equipment acquired with federal support must be retained for three years after final disposition (2 CFR 200.334(c)). For real property still in authorized use, that can mean decades. Records involved in an unresolved audit, claim, or litigation stay until it is resolved and final action is taken.

6.5 Failure Pattern

The most common Layer 6 failure is equipment that cannot be tied back to the award. Equipment was bought with federal funds, but it was never given an identification number linked to the property record, or the record does not show the FAIN and the federal share. When the auditor runs the property review, the gap becomes a finding. Fixing it is simple (assign the identifiers and complete the record), but the lack of a contemporaneous record shows the property management discipline was not in place when it should have been.

A second failure: property is disposed of without disposition documentation. The asset is sold, transferred, or scrapped. No federal share calculation is done and no disposition record is created. Years later, the auditor reconciles the inventory and finds assets missing. The recipient cannot evidence proper disposition, and the federal share is recovered.

A third failure: the federal interest in real property is not documented in the property record. The land or building was acquired or improved with federal funds. The deed and property record show only the recipient's ownership. The federal interest stays invisible until a transaction triggers it, at which point the agency raises it and the transaction is delayed or blocked.

7 Layer 7: Personnel and Labor

This layer documents the people charged to the award and the labor standards they worked under. Personnel and labor findings are among the most labor-intensive to remediate.

7.1 Why This Layer Exists

Federal awards require documentation that personnel costs charged to the award reflect the work actually performed on it, and that any labor standards the award imposes were met. Under 2 CFR 200.430(g), charges for salaries and wages must be based on records that accurately reflect the work performed and are supported by a system of internal control. Budget estimates alone do not qualify as support. They can be used for interim accounting only if the system produces reasonable approximations, significant changes are promptly recorded, and periodic after-the-fact reviews adjust the charges so the final amount is accurate (2 CFR 200.430(g)(1)(vii)).

Labor standards are the second half of the layer. Where Davis-Bacon applies through the program statute, contractors and subcontractors must pay prevailing wages, keep payroll records, and submit weekly certified payrolls under 29 CFR 5.5(a)(3). Where the same project also claims an IRA credit at the increased rate, the apprenticeship rules in 26 CFR 1.45-8 add their own labor hour, ratio, and participation requirements. These obligations are administered differently, but they live in the same layer because they answer the same audit question: did the people working on the award meet the documentation and labor standards the award and the credit impose?

7.2 Documents That Belong in This Layer

- Written policy for documenting personnel expenses
- Personnel activity records supporting salary and wage charges, and the after-the-fact reviews and adjustments of any charges based on budget estimates
- Position descriptions for federally funded roles
- Documentation supporting the personnel cost allocation methodology
- Davis-Bacon applicability determinations
- Applicable Department of Labor wage determinations
- Weekly certified payrolls from all contractors and subcontractors at every tier
- Certified payroll review documentation showing substantive review against the wage determinations
- Apprentice registration documentation under registered apprenticeship programs
- Apprentice labor hour tracking against the labor hour percentage, ratio, and participation requirements of 26 CFR 1.45-8, where IRA credits are claimed
- Documentation of required worker notices and postings
- Restitution documentation for any wage underpayments cured during construction
- Good faith effort documentation, where used

7.3 Naming Convention Examples

- `[AwardID]\_Personnel\_ExpenseDocPolicy\_v1\_YYYY-MM-DD.pdf`
- `[AwardID]\_Personnel\_[StaffName]\_ActivityRecord\_YYYY-Qn.pdf`
- `[AwardID]\_DavisBacon\_Applicability\_YYYY-MM-DD.pdf`
- `[AwardID]\_DavisBacon\_WageDetermination\_[DeterminationID]\_YYYY-MM-DD.pdf`
- `[AwardID]\_CertifiedPayroll\_[ContractorName]\_YYYY-WeekNN.pdf`
- `[AwardID]\_CertifiedPayroll\_Review\_[ContractorName]\_YYYY-WeekNN.pdf`
- `[AwardID]\_Apprentice\_[ApprenticeID]\_RegistrationVerify\_YYYY-MM-DD.pdf`
- `[AwardID]\_Apprentice\_LaborHourTracking\_YYYY-Qn.xlsx`

7.4 Retention Rules

Personnel records carry the baseline three years from submission of the final financial report under 2 CFR 200.334. Davis-Bacon has its own rule for the contractors: payrolls and basic records must be preserved for at least three years after all the work on the prime contract is completed (29 CFR 5.5(a)(3)(i)). Keep your copies on whichever clock runs longer. If litigation, a claim, or an audit involving the records starts before the period expires, keep them until it is resolved and final action is taken (2 CFR 200.334(a)). We recommend the same hold for a Wage and Hour Division investigation.

7.5 Failure Pattern

The most common Layer 7 failure is salary charged on budget estimates with no after-the-fact review. Personnel were charged to the award at effort percentages set at the start of the year. No one ever compared those estimates to the work actually performed or adjusted the charges. The auditor reviews personnel costs and finds nothing supporting actual effort against actual cost. The disallowance can then reach the entire personnel cost charged to the award.

A second failure: certified payrolls were collected from prime contractors but not from lower-tier subcontractors. The contract clauses must flow to every subcontract and lower-tier subcontract, and the prime contractor is responsible for compliance down the chain (29 CFR 5.5(a)(6)). When the Wage and Hour Division finds the gap during a complaint investigation, the recipient's prime-tier documentation does not cover the subcontractor-tier problem.

A third failure, for projects that also claim IRA credits: apprentice labor hours were tracked informally and cannot be reconstructed against the 26 CFR 1.45-8 requirements. The project is placed in service. The increased credit amount depends on meeting the apprenticeship requirements. The file cannot evidence compliance, and the increased credit is at risk.

8 Layer 8: Cross-Cutting Compliance

This layer covers the federal compliance overlays that sit on top of the program-specific requirements. They are broad, often unfamiliar, and the source of failures the recipient did not see coming.

8.1 Why This Layer Exists

Federal energy awards trigger a stack of cross-cutting requirements. The usual ones are NEPA environmental review, National Historic Preservation Act Section 106 review (36 CFR Part 800), the Build America, Buy America domestic preference for infrastructure (2 CFR Part 184), Davis-Bacon prevailing wage, civil rights requirements under Title VI and Section 504 (for DOE awards, 10 CFR Part 1040), lobbying restrictions under 31 U.S.C. 1352, conflict of interest, drug-free workplace, and suspension and debarment under 2 CFR 200.214 and 2 CFR Part 180. Each carries documentation expectations. The Layer 8 file shows how the recipient met each obligation that applies to its award.

NEPA and Justice40 rules have changed since many awards were made. Check the current rules:

- **NEPA.** CEQ removed its NEPA implementing regulations effective April 11, 2025, and DOE revised its own NEPA procedures in 10 CFR Part 1021 by interim final rule effective July 3, 2025. The review levels (categorical exclusion, environmental assessment, environmental impact statement) still exist. Document the level and the basis under the procedures that applied when the review was done.
- **Justice40 and Community Benefits Plans.** Executive Order 14008, the source of the Justice40 Initiative, was revoked in January 2025. DOE's Policy Flash 2025-16 rescinded its Justice40 and Community Benefits Plan guidance and directed that terms identified in that guidance no longer be used. If an older award still carries a community benefits commitment in its terms and conditions, document how it was handled, including any modification removing it. Do not build new files around requirements that no longer appear in your award.

8.2 Documents That Belong in This Layer

- NEPA documentation: the review level (categorical exclusion, EA, or EIS), supporting environmental documentation, and the FONSI or ROD where applicable
- NHPA Section 106 documentation: area of potential effects, SHPO consultation, tribal consultation where applicable, and any programmatic agreements
- Build America, Buy America documentation: applicability determination, component cost calculations for manufactured products (the domestic content of components must exceed 55 percent of total component cost under 2 CFR Part 184), supplier certifications, and any waivers
- Davis-Bacon documentation (cross-reference to Layer 7)

- Civil rights compliance documentation: Title VI and Section 504 assurances and plans, language access plan, and accessibility documentation
- Community benefits documentation, only where your award's current terms and conditions still require it, with any modification that changed or removed the requirement
- Lobbying certification and any required disclosure (for DOE awards over \$100,000, 10 CFR Part 601)
- Conflict of interest disclosures and resolution documentation
- SAM.gov exclusion checks for contractors and subrecipients
- Drug-free workplace certification, where the award requires it
- Any program-specific cross-cutting documentation

8.3 Naming Convention Examples

- `[AwardID]\_NEPA\_ReviewLevel\_Determination\_YYYY-MM-DD.pdf`
- `[AwardID]\_NEPA\_EA\_FONSI\_YYYY-MM-DD.pdf`
- `[AwardID]\_Section106\_APE\_Mapping\_YYYY-MM-DD.pdf`
- `[AwardID]\_Section106\_SHPO\_Consultation\_YYYY-MM-DD.pdf`
- `[AwardID]\_BABA\_Applicability\_YYYY-MM-DD.pdf`
- `[AwardID]\_BABA\_SupplierCert\_[VendorName]\_YYYY-MM-DD.pdf`
- `[AwardID]\_BABA\_Waiver\_[WaiverType]\_YYYY-MM-DD.pdf`
- `[AwardID]\_TitleVI\_Plan\_v1\_YYYY-MM-DD.pdf`
- `[AwardID]\_CommunityBenefits\_TermsStatus\_YYYY-MM-DD.pdf`
- `[AwardID]\_LobbyingCert\_Signed\_YYYY-MM-DD.pdf`
- `[AwardID]\_SAM\_ExclusionCheck\_[VendorName]\_YYYY-MM-DD.pdf`

8.4 Retention Rules

Cross-cutting compliance records carry the baseline three years from submission of the final financial report under 2 CFR 200.334, unless the agency extends the period in writing. Records involved in an open enforcement matter, such as a civil rights complaint, an Inspector General review of Build America, Buy America compliance, or a Section 106 dispute, stay until it is resolved and final action is taken.

8.5 Failure Pattern

The most common Layer 8 failure is incomplete Build America, Buy America documentation. Applicability was confirmed and supplier certifications were collected, but the calculation methodology was never written down, and the certifications lack the component cost detail that the 55 percent test depends on. When the agency or Inspector General reviews compliance, the file produces certifications without the analysis, so compliant sourcing cannot be proven.

A second failure: NEPA documentation lives in the project file but is not cross-referenced in the award compliance file. The auditor finds no NEPA evidence in the award file and flags the gap. The team produces it from the project file, but the gap is already a finding.

A third failure: a commitment in the award terms, such as a community benefits plan, never gets an execution record. Some activities happened, but none map back to the commitment, so at performance reporting the execution narrative cannot be substantiated.

9 Layer 9: Closeout Documentation

The final layer. Closeout pulls documentation from every prior layer into a closeout package and starts the retention clock. Closeout failures keep the award open past the period of performance. If a recipient misses the closeout requirements, 2 CFR 200.344(i) requires the agency to report the material failure to comply in SAM.gov, using CPARS.

9.1 Why This Layer Exists

Under 2 CFR 200.344(b), a recipient must submit all reports required by the award (financial, performance, and other) no later than 120 calendar days after the period of performance ends. A subrecipient owes its reports to the pass-through entity within 90 calendar days, or earlier if the subaward says so. Recipients must also liquidate all obligations within 120 days (200.344(c)), promptly refund unobligated funds they are not authorized to keep (200.344(e)), and account for property under 2 CFR 200.310 through 200.316 and 200.330 (200.344(g)). The agency must make every effort to complete closeout within one year after the period of performance ends (200.344(h)). The closeout file documents that each of these obligations was met completely and on time.

9.2 Documents That Belong in This Layer

- Closeout milestone calendar and tracking
- Final SF-425, fully reconciled to the general ledger and to draws
- Final performance report with the full deliverable evidence package
- Property and equipment accounting and disposition documentation
- Refund documentation for unobligated balances
- Final subrecipient closeout documentation
- Final cross-cutting closeout items, such as the final Build America, Buy America reconciliation and NEPA closeout where applicable
- Records transition documentation showing all award records moved to their retention location
- Agency closeout correspondence and final closeout acknowledgment
- Any retention extension or audit hold notices affecting the award records

9.3 Naming Convention Examples

- `[AwardID]\_Closeout\_Calendar\_YYYY-MM-DD.xlsx`
- `[AwardID]\_Closeout\_FinalSF425\_YYYY-MM-DD.pdf`
- `[AwardID]\_Closeout\_FinalPerfReport\_YYYY-MM-DD.pdf`
- `[AwardID]\_Closeout\_PropertyDisposition\_Summary\_YYYY-MM-DD.pdf`
- `[AwardID]\_Closeout\_UnobligatedBalance\_Refund\_YYYY-MM-DD.pdf`
- `[AwardID]\_Closeout\_RecordsTransition\_Cert\_YYYY-MM-DD.pdf`
- `[AwardID]\_Closeout\_AgencyAcknowledgment\_YYYY-MM-DD.pdf`

9.4 Retention Rules

Submitting the final financial report starts the three-year retention period under 2 CFR 200.334 for most records. Property and equipment records run three years after final disposition. Records under an unresolved audit, claim, or litigation stay until it is resolved and final action is taken.

9.5 Failure Pattern

The most common Layer 9 failure is late closeout. The 120-day window passes. The agency follows up. The recipient scrambles to assemble the package from records that were never kept closeout-ready, and the closeout goes in late and incomplete. In my view, that history follows the recipient into the agency's risk review on its next application.

A second failure: closeout is submitted with property disposition unresolved. Equipment is still subject to the federal interest. The federal interest in real property is not documented in the recipient's property record. The award looks closed administratively, but the federal interest continues with no documented disposition plan.

A third failure: the records transition is never formally documented. The award closes. The records stay in the project management system. Three years later, the system is migrated, reorganized, or archived, and the records become inaccessible. When a later audit or program review asks for them, they cannot be produced. The loss is treated as a finding however it happened.

10 The File Architecture Audit

A self-assessment framework for scoring your current file architecture against the nine-layer standard. Run it for each active or recently closed award.

10.1 Four Standards per Layer

Assess every layer against the same four standards.

Standard 1: Document Completeness. Are all the documents the layer requires actually in the file?

Standard 2: Naming Convention Compliance. Are documents named under a consistent convention that lets anyone with access retrieve them?

Standard 3: Institutional Ownership. Does the institution own the file, rather than individual staff members? Could a new employee with no history on the award navigate it?

Standard 4: Retention Discipline. Is retention locked through the applicable period? Is the file protected against premature loss through system migration, reorganization, or staff transition?

10.2 Scoring Convention

Score each standard, for each layer:

Score	Rating	Meaning
0	Architecture Sound	The standard is fully met. The file would withstand audit inquiry.
1	Architecture Gap	The standard is partly met. Some elements exist, and gaps would surface on audit.
2	Architecture Missing	The standard is not met. The file would fail an audit on this standard.

The maximum is 8 points per layer (4 standards at 2 points each) and 72 points across all nine layers. Lower scores mean stronger architecture.

10.3 Architecture Strength Bands

Total	Band	What to do
0 to 14	Sound	The architecture is audit-defensible across the nine layers. Maintain the discipline and re-audit annually.
15 to 36	Gap-Prone	Material gaps exist. Fix Architecture Missing scores first, particularly in Layers 1, 3, 7, and 9 (Award, Procurement, Personnel and Labor, Closeout), which in my view are the highest-risk layers.

Total	Band	What to do
37 to 72	Audit-Exposed	The architecture will not withstand audit inquiry. A structured rebuild is warranted before the next single audit, program officer site visit, or Inspector General review. In my view, rebuilding now costs far less than remediating findings and running corrective action plans later.

10.4 Audit Output

For each award evaluated, produce a one-page summary listing the layer-by-layer scores, the total, the strength band, and the prioritized remediation actions. File the summary itself in Layer 1. It becomes part of the institutional record showing that the recipient actively manages its documentation architecture.

10.5 Why the Architecture Pays

File architecture is not glamorous. Standardized naming, institutional ownership, and retention discipline produce nothing you can measure on the day the work is done. The return shows up the first time an examiner asks for a specific document and you produce it within the hour instead of within the week. It compounds the second time, and over time it sets your audit posture across the whole portfolio of federal awards.

My view is that disciplined file architecture gives a recipient its best chance of coming through an examination clean, or with minor findings it can clear at closing. Recipients with weak architecture collect documentation findings that hide the quality of their actual compliance work. Those findings are not about the work. They are about the architecture that holds the record of it, and that architecture either supports the work or undermines it.

Rob's View

If the self-assessment turned up material gaps, do not wait for the auditor to find them. Fix the layers that score Architecture Missing on your largest award first, then carry the same conventions across the rest of the portfolio.

Glossary

Term	Meaning in this paper
Assistance Listing Number (ALN)	The unique number assigned to a federal assistance program in the Assistance Listings that GSA maintains at SAM.gov.
ASAP	The Automated Standard Application for Payments, a federal system many agencies use for recipient draws.
Build America, Buy America (BABA)	The domestic preference for iron, steel, manufactured products and construction materials in federally funded infrastructure (2 CFR Part 184).
Categorical exclusion (CatEx)	A category of actions an agency has found normally need no environmental assessment or impact statement under NEPA.
Closeout	The agency's or pass-through entity's determination that an award's administrative actions and required work are complete (2 CFR 200.344).
De minimis rate	The indirect cost rate of up to 15 percent of modified total direct costs that a recipient without a current negotiated rate may elect under 2 CFR 200.414(f).
FAIN	The Federal Award Identification Number assigned to each federal award. Equipment records must show it.
Management decision	The written decision on an audit finding and its corrective action, due within six months of the Clearinghouse accepting the report (2 CFR 200.521).
NICRA	A Negotiated Indirect Cost Rate Agreement between a recipient and its cognizant agency for indirect costs.
Noncompetitive procurement	Procurement without competition, allowed only in the circumstances in 2 CFR 200.320(c).
Pass-through entity	A recipient or subrecipient that makes subawards and carries the monitoring duties of 2 CFR 200.332.
Period of performance	The time between an award's start and end dates, which may span several budget periods (2 CFR 200.1).
Section 106	The National Historic Preservation Act review of effects on historic properties (36 CFR Part 800), with the SHPO.
SF-425	The Federal Financial Report, the government-wide form for reporting award expenditures.
Single audit	The Subpart F audit of a non-federal entity spending \$1,000,000 or more in federal awards in a fiscal year.
Subrecipient	A subaward holder carrying out part of a federal award (2 CFR 200.331).

How Energy Compliance Can Help

This reference is the file standard behind our post-award work. If your award files would not survive the self-assessment in Chapter 10, these are the places our team helps most.

File Architecture Build. We build the nine-layer audit file structure for your awards: naming convention standardization, migration of records into institutional ownership, and locked retention discipline.

Post-Award Compliance Administration. We set up the Compliance Obligation Matrix and reporting cadence, stand up subrecipient monitoring where the award calls for it, and get the file ready for single audit under 2 CFR Part 200.

Audit Response. When the examiner is already asking, we prepare for the examination or Inspector General inquiry, run document retrieval, remediate findings, and draft the corrective action plan.

Records Migration. We move closed-award records to their retention location, plan for long-term accessibility, reduce system migration risk, and write the SOPs that keep the records inspection-ready.

IRA and Tax Credit Compliance Support. If the same project claims IRA credits, we build the prevailing wage and apprenticeship documentation in Layer 7 to the standard the credit requires.

WattOps Compliance and RenewOps. A funded generation or storage project that becomes a NERC-registered asset brings NERC evidence obligations along with the federal ones. WattOps Compliance is EC's NERC compliance evidence platform, at wattopscompliance.com, and we will run one standard at one of your facilities through it at no cost so you can see maintained evidence in practice (CIP standards are excluded from that offer). For the operating data behind performance claims on a funded renewable or storage asset, RenewOps is EC's renewable operations monitoring and analytics platform, with a Data Center module.

Send me your scores from the self-assessment and the award you worry about most, and I will tell you where I would start. 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.

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- MBA, Energy Management, University of Mary
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- 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
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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. In our view, that is where funded energy projects get into trouble, not at the award decision.

Our funding and regulatory services are organized in seven packages:

- **Grant Readiness Assessment.** Pre-application diagnostic and gap closure.
- **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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