# Bipartisan Infrastructure Law - SECTION 40101(d)

PREVENTING OUTAGES AND ENHANCING THE RESILIENCE OF THE ELECTRIC GRID

# Oregon September XX, 2022

# **DRAFT Proposed Program Narrative**

Note for Reviewers: Italicized text contains the prompting questions from the United States Department of Energy that the Oregon Department of Energy must respond to for each section, in alignment with the requirements contained in the <u>solicitation announcement</u>. Information contained in regular text is ODOE's proposed response to the <u>prompting questions</u>.

#### 1. Objectives and Metrics:

List 3-5 objectives that the applicant intends to apply for guiding their resilience investment decisions. The intent of this section of the Program Narrative is to ultimately develop a planning framework for resilience to address all-hazards including future climate implications. The first year, DOE is seeking input on criteria for determining investment decisions. At a minimum, the objectives and metrics should address:

- a. resilience and energy justice concerns, including reducing the frequency and duration of outages in disadvantaged communities,
- b. how the project will use strong labor standards and protections (including for direct employees, contractors, and sub-contractors), such as through the use of project labor agreements, local hire agreements, and outline of a plan to attract, train, and retain an appropriately skilled workforce (i.e., through registered apprenticeships and other joint labor-management training programs that serve all workers, particularly those underrepresented or historically excluded); plans to partner with a training provider (labor, community college, etc); and the use of an appropriately credentialed workforce (i.e., requirements for appropriate and relevant professional training, certification, and licensure).

Provide the metrics that will accompany the objectives to measure outcomes associated with improving resilience, creating good-paying jobs with the free and fair choice to join a union, and advancing energy justice.

Indicate whether the objectives and metrics are provisional pending further discussion and consideration by the State or Indian Tribe with its stakeholders. DOE expects that recipients will establish a formal set of objectives and metrics in order to receive Year 2 formula funding. Examples of objectives and metrics, in addition to reporting on any DOE required metrics, and approaches for establishing them are available at: <u>Section 40101(d) Formula Grants to States & Indian Tribes | netl.doe.gov</u>

ODOE will employ a **provisional approach** to this program for the first year of operation, focusing on wildfire and disadvantaged communities. This provisional approach will allow investments to be made in areas which will provide the greatest community benefit.

To inform future years of the program, ODOE plans to form an advisory committee in the first year to provide recommendations on the objectives and metrics that support prioritization of resilience projects that are:

- 1. Identified by and located within disadvantaged and/or Tribal communities in alignment with the Justice40 initiative;
- 2. Designed to address grid disruptions associated with multiple hazards, not just wildfire; and
- 3. Aligned with mitigation strategies identified in the State Energy Security Plan.

In order to accomplish future objectives and metrics, ODOE will seek feedback on whether to consider additional measures or a broader base of potential applicants.

ODOE will use the following provisional objectives and metrics to guide program during its first year of the program:

Objectives	Metrics
Objective 1: To support resilience	Number of projects funded by measure
investments in locations of the state either	type
impacted by wildfire or at-risk of wildfire,	Number of customers anticipated to
or located in a Disadvantaged Community.	benefit from the project
	Number of projects located in area
	impacted or at-risk of wildfire
	Number of projects and customers in
	disadvantaged communities
Objective 2: To support immediate	Number of applications determined to be
investments in projects that provide	adequately scoped and ready for funding
community benefits as soon as possible.	Average time from notice of full award to
	start of construction
Objective 3: Applicants will meet strong	Number of hours worked on this project by
labor protections and standards.	subrecipients and contractors (if
	applicable).
Objective 3: To require attestation and	Average wage paid to workers covered by
reporting from applicants that their project	Davis-Bacon requirements.
operations will meet strong labor	Number of women, minority individuals,
protections and standards.	veterans, and/or people with disabilities
	performing work under Davis-Bacon
	covered employment.
Objective 4: To engage with and involve	Number of individuals contacted about
disadvantaged communities and Tribal	program
communities during the program's first	Number of organizations contacted about
year to identify interest and technical	program

assistance needs in order to increase	Number of conversations with
projects in disadvantaged communities and	disadvantaged communities about the
greater alignment with Tribal communities	program.
in future years of the program.	Number of communications with Tribal
	communities about the program.
	Number of COBID certified firms who apply
	for contracts under the grant-funded
	projects
	Number of projects located in
	disadvantaged communities and/or Tribal
	communities
Objective 5: To design objectives, metrics,	Number of public meetings held for
and criteria for years 2-5 of the program	formulating future approach
that support an all-hazards approach	Number of individuals participating from
informed by the State Energy Security Plan	disadvantaged communities and/or Tribal
and key stakeholders that prioritizes	communities
projects identified by and located within	
disadvantaged communities and/or Tribal	
communities.	

#### 2. Criteria:

Describe the criteria used for selecting and determining the awards to eligible entities. At a minimum, the criteria should address specific requirements set forth in Section 40101(d), which include that:

- a. Priority should be given to projects that will generate the greatest community benefit (whether rural or urban) in reducing the likelihood and consequences of disruptive events,
- b. The percentage made available to eligible entities that sell not more than 4,000,000 megawatt hours of electricity per year should not be less than the percentage of all customers in the State or Indian Tribe that are served by those eligible entities, and
- c. Awards should be provided to eligible entities for projects within the State or on the land of the Indian Tribe.

#### Criteria for Award during the First Year of the Program:

As a result of Oregon's recent disasters, particularly the loss of life and economic loss resulting from wildfire, ODOE has determined that eligible investments in projects that meet the criteria below will provide the greatest community benefit in reducing the likelihood and consequences of disruptive events during the first year of the program.

As a first tier of prioritization, ODOE will seek to invest in projects located in an area of the state recently and directly affected by wildfire or an area of the state at high-risk of wildfire, as well as projects that benefit an area identified as a disadvantaged community or tribal community. If additional funds remain available after this initial tier of priority funding, ODOE

will seek to invest in mitigation projects identified in existing hazard mitigation or other existing plans.

Additional details, including applicable definitions and minimum requirements of all applicants are included below in the "Methods" section of this program narrative. Under the state program, eligible measures will include:

- (a) Weatherization technologies and equipment;
- (b) Fire-resistant technologies and fire prevention systems;
- (c) Monitoring and control technologies;
- (d) Undergrounding of electrical equipment;
- (e) Utility pole management;
- (f) Relocation of power lines or the reconductoring of power lines with low-sag, advanced conductors;
- (g) Vegetation and fuel-load management;
- (h) The use or construction of distribution energy resources for enhancing system adaptive capacity during disruptive events, including:
  - a. Microgrids, and
  - b. Battery-storage subcomponents;
- (i) Adaptive protection technologies;
- (j) Advanced modeling technologies;
- (k) Hardening power lines, facilities, substations, and other systems;
- (I) Replacement of old overhead conductors and underground cables; and
- (m) Training, recruitment, retention, and reskilling of skilled and properly credentialled workers in order to perform work required for the resilience measures listed in (a)-(l).

Applicants must identify the measures they propose to undertake, including any combination of measures as part of their application.

#### Percentage made available to small utilities:

During the first year of the program, ODOE will restrict eligible entities to only electric utilities that are distribution providers. Additionally, ODOE will require in the first priority round that a minimum of 40% of the funds available for subgrants be made available to eligible entities that sell not more than 4,000,000 megawatt hours of electricity per year.

In recognition that the sales of an individual utility will vary on an annual basis and this variation can complicate planning efforts by potential applicants, ODOE defines an entity that sells less than 4,000,000 megawatt hours by averaging sales data from the previous five years sales, as available, as reported in the EIA form 861 report. This provides a more stable baseline for potential applicants. This analysis will be updated and revised accordingly on an annual basis by ODOE staff.

During the first year of the program the average annual sales analysis results in the following determinations, consistent with the match requirements in Section 40401(d):

- 1. All investor-owned utilities (including PGE, PacifiCorp, and Idaho Power) will be required to provide 100% match for any award, if selected.
- 2. All other electric distribution utilities in the state, including all consumer-owned utilities, will be required to provide 1/3 match for any award, if selected.

This 40% designation for small utilities exceeds the minimum set aside required by 40101(d). Based on the Oregon Utility Statistics Book, published by the Oregon Public Utility Commission, ODOE's calculations find that 26% of all customers are served by small utilities under this definition. This would represent the minimum set-aside required by 40101(d). However, these small utilities represent 36% of annual megawatt-hour sales. Adopting a 40% set-aside ensures the minimum requirements of the program are met and will further support small utilities, many of which serve large rural areas in lower income parts of the state and many of which serve communities that were disproportionately impacted by catastrophic wildfires in recent years.

An applicant may only submit a single application as a primary applicant during each funding round.

# All projects must be located within the state of Oregon:

All projects funded under the program will be required to be located within Oregon.

# Planning for Future Year Applications to US DOE:

ODOE will conduct significant outreach efforts to disadvantaged communities during the first year of this program, so these community members, their representatives, and communitybased organizations can participate in the design of a more comprehensive grid resilience program in alignment with the goals of the Justice40 initiative. ODOE intends that 40% of the benefits of these funds will flow to disadvantaged communities over the five-year program; however, we recognize this target may not be met during the first year of the program. In future years, ODOE anticipates funding cycles with a greater focus on delivering benefits to these communities.

During the first year of the program ODOE will establish an advisory committee to aid in planning for future year applications to US DOE. This advisory committee will invite representatives from disadvantaged communities; environmental justice communities; investor-owned utilities; consumer-owned utilities; consumer advocates; the Public Utility Commission; the Department of Emergency Management; the interagency Hazard Mitigation Team; and the Governor's Office to participate as committee members.

The advisory committee will convene not less than three public meetings to identify existing sources of information pertaining to potential community benefits in reducing the likelihood and consequences of disruptive events.

This advisory committee will propose recommendations related to objectives and metrics for future years of the program based on a broader all-hazards approach including review of any available information in Oregon's Energy Security Plan, being developed concurrently, or

other hazard mitigation plans. This process will provide consideration for expansion of additional categories of potential applicants and eligible measures to meet identified needs.

# 3. Methods:

Provide a description of the methods the applicant anticipates using for soliciting, awarding, and distributing funds. These might include several options, including the use of competitive solicitations, direct awards, and the use of financial instruments, such as Green Banks, to leverage the funds through 40101(d).

Provide also a description of the methods the applicant anticipates using to track and make public the metrics achieved by awardee uses of program funds to improve resilience by reducing the likelihood and consequences of disruptive events, to generate quality jobs, and to improve equity and community benefits.

# Methods of Award:

ODOE will use a direct grant approach during the first year of the program, inviting utility applicants to demonstrate how they comply with minimum project eligibility requirements. ODOE will then determine whether a project is eligible. Applications will not be competitively scored against one another for year one of the program, but this is something that will be considered for future years. In each application round, 40% of the total funding will be made available for small utilities.

At least 60 days prior to any open application period, ODOE will publish an anticipated schedule specific to that application containing key dates for the application cycle. For each application cycle, the application materials will be available for a minimum of 30 days prior to opening the application window

In the application materials developed for each funding cycle, ODOE will identify specific timelines and processes to select awards if the applications received exceed the available funds during a cycle. Such processes may include selecting projects on a first-come, first-served basis or a randomized lottery, or a combination of the two.

After a review of submitted materials, ODOE staff will prepare a notice to the applicants. Applicants may receive one of the following notices:

- Notice of Intent to Award This notice will be sent to applicants determined eligible to receive available funding. Final approval will be subject to additional approvals from ODOE and the US DOE, based on specific project documentation and review.
- 2. Notice of Insufficient Application This notice will be sent to applicants determined not eligible for funding, along with a description of why the applicant and/or project was determined ineligible.
- 3. Notice of Insufficient Funding This notice will be provided to any applicant who submits an eligible application but is not selected due to lack of funding availability. ODOE reserves

the right to offer partial awards to applicants who receive this notice, where partial funding may be available.

# Minimum application content

Application must be complete; incomplete applications may be rejected. At a minimum all applications must include:

- Contact information regarding the applicant;
- A detailed description of the measure(s) the applicant intends to undertake as part of the project;
- The location of the proposed project;
- The number of customers served by the project;
- Description of how the project meets the priorities of the specific funding round,
- including a Community Engagement Addendum, if applicable;
- Description of how the investment will improve resilience in the communities the utility serves;
- Description of how the project will benefit environmental justice communities, disadvantaged communities or Tribes, if applicable;
- Attestation the applicant is not barred from receiving federal funds;
- Certification the applicant has reviewed all application materials and is prepared to meet all requirements of the program, including, but not limited to: National Environmental Policy Act; Buy American provisions, Davis-Bacon Act requirements, and reporting requirements identified by ODOE;
- Certification the project planning is at a sufficient stage of progress, based on requirements determined by ODOE, to facilitate the completion of US DOE's Environmental Questionnaire, if project is selected;
- Certification the application will be able to provide match funds to support the project, including identification of the source of matching funds;
- Certification the applicant intends to initiate the project within 24 months of award execution and the anticipated completion of not to exceed four years from date of award.

• A project budget and budget narrative aligned with the SF-424A, following guidance from ODOE.

# Application Funding Rounds and maximum awards:

Funding will be made available to applicants in one or more funding rounds, until all available funds for subrecipients are in committed to applicants. Maximum awards will vary based on whether the applicant is a large or small utility, as described in this project narrative. The maximum award a large utility may request in a funding round can be equal to, but cannot exceed, a percentage of all funds available in that round that equals that utility's proportionate share of the state's electricity sales among all large utilities, as calculated by

ODOE. The maximum award a small utility may apply for in a funding round shall not exceed \$400,000.

# First-Tier Priority Round

The first round of available funding will be narrowly tailored to provide the greatest community benefit, limiting eligibility to projects that are:

- (a) In an area recently directly affected by wildfire or at high-risk of wildfire, based on:
  - a. A determination by the utility to be an area at high-risk of wildfire (such as an area designated in a High-Risk Fire Zone or Fire High Consequences Area in a utility wildfire plan filed with the Oregon Public Utilities Commission); and,
  - b. The project being located in one of the following areas of the state as identified by ODOE on a map developed for this program that is either:
    - i. An area that was eligible for individual assistance from FEMA resulting from a federal disaster declaration due to wildfire that was issued between January 1, 2018 and January 1, 2023; <u>or</u>,
    - ii. An area at high risk of wildfire.
      - ODOE proposes to make this determination based upon whether a project is located within one of the following <u>Oregon Forest</u> <u>Protection Districts</u> which ODOE has determined are broadly aligned with areas of the state identified as "very high" wildfire risk<sup>1</sup> within the Oregon Explorer Map:
        - a. Central Oregon
        - b. North Cascade
        - c. South Cascade
        - d. Douglas FPA
        - e. Coos FPA
        - f. Southwest Oregon
        - g. Walker Range
        - h. Klamath Lake
        - i. Northeast Oregon
- (b) Located on the premises of, or otherwise directly serving (e.g., a distribution line or nearby substation), a public facility that has been identified as the State Emergency Coordination Center.
- (c) That benefit disadvantaged communities or Tribal communities, as identified by either the Climate and Economic Justice Screening Tool or the U.S. Department of Energy's Energy Justice Dashboard. Proposals submitted under this priority must also submit a

https://tools.oregonexplorer.info/OE HtmlViewer/Index.html?viewer=oe

<sup>&</sup>lt;sup>1</sup> This assessment is based upon the Pacific Northwest Quantitative Wildfire Risk Assessment Data (2018) as incorporated in the Oregon Explore map, publicly available online:

Community Engagement Addendum to demonstrate the project has community support along with a robust engagement plan.

All proposals submitted in the First Tier Priority Round must propose activities that will directly mitigate the risk of wildfire, improve the state's coordinated emergency response capabilities, or benefit disadvantaged communities or Tribal communities during this round.

# Second Tier Priority Round

This funding round will only be initiated if funds remain uncommitted from the first tier priority round. Projects located anywhere in the state may be submitted provided the project meets the following priorities:

- (a) The proposal must identify a hazard(s) and identify how the proposed project would mitigate the impacts of that hazard(s) to improve resilience in the areas the utility serves; and
- (b) Projects designed to mitigate hazards that were previously identified in a plan published by the utility applicant or by a community or jurisdiction that the utility serves (e.g. wildfire mitigation plan, local climate or energy plan, natural hazard mitigation plan, capital improvement plan, etc.) prior to July 1, 2022.

If funding remains available and uncommitted after 60 days of availability under this tier, ODOE may elect to remove the minimum set asides for large & small utilities, provided that doing so does not hinder Oregon's ability to comply with the overall federal requirement that 26% of funds are made available to small utilities.

Additionally, applicants not funded as primary recipients in the First Tier Priority Round will receive prioritization for funding in the Second Tier Priority Round during an initial time period.

# Methods to track and publish metrics

ODOE will provide cumulative and project specific information about the Grid Resilience investments on a program specific website hosted by the agency. The information will be updated no less frequently than semi-annually and will include a summary of each project and the associated metrics achieved to date.

# 4. Funding Distribution:

Provide a description of the proposed funding distributions and categories of recipients of the subgrants to be provided to eligible entities. Also, indicate preferences for eligible entities if they do not explicitly appear on the list of eligible entities provided in Section 40101.

ODOE anticipates providing the state match requirement with the use of state general funds requested specifically to support the first year of the program. State match funds may be used to support additional positions at ODOE to administer the program, professional

services to support program administration, additional support for projects receiving federal funds, as well as capacity building support for disadvantaged communities.

The subrecipients selected for available awards under this program will be limited to electric distribution utilities during the first year. ODOE will ensure that a minimum of 26% of the funds are made available to small utilities who sell less than 4,000,000 megawatt hours of electricity annually, as defined by ODOE. The subrecipients will be required to match at a rate of either 100% or 1/3 based on their average annual electricity sales, as defined above in this application by ODOE.

ODOE is currently working to identify existing in-kind resources that may support the program in future years and exploring efforts to align multiple state-funded programs related to enhancing state and community resilience.

#### 5. Equity Approach:

To achieve the greatest impact for all Americans with this once-in-a-generation investment in infrastructure, it is critical that the BIL-funded projects not only contribute to the country's energy technology and climate goals, but also (1) support the BIL objectives to invest in America's workforce by including specific elements to accelerate job growth and job quality, including approaches to give workers a free and fair choice to join or form a union; and (2) advance DOE's equity, environmental and energy justice priorities, including DOE's commitment to the Justice40 Initiative. Accordingly, the Program Narrative must describe how the State or Indian Tribe will ensure their proposed project will incorporate:

- a. Quality Jobs: Strengthening prosperity by expanding good-paying, safe jobs accessible to all workers and supporting job growth through investments in domestic supply chains is a key goal set by President Biden, discussed in depth in his Executive Orders on Ensuring the Future Is Made in All of America by All of America's Workers (EO 14005), Tackling the Climate Crisis at Home and Abroad (EO 14008), Worker Organizing and Empowerment (EO 14025), Boosting Quality of Federal Construction Contracts (EO 14063), Promoting Competition in the American Economy (EO 14036), and Implementing the Infrastructure Investment and Jobs Act (EO 14052). Accordingly, this section of the Program Narrative should address efforts to achieve these goals, including
  - i. efforts to attract, train, and retain a skilled workforce and
  - *ii.* workforce opportunities in communities that have lost jobs due to the displacements of fossil energy jobs; and
- b. Community Benefits: Section 40101(d)(5) requires a State or Indian Tribe to give priority to projects that would generate the greatest community benefit (whether rural or urban) in reducing the likelihood and consequences of disruptive events. The Program Narrative should include an explanation of how the State or Indian Tribe will make such a determination for the projects that will be receiving funding and should include information on how the projects go beyond measures that are already being undertaken through current resilience planning by the State or Indian Tribe.

c. Diversity, Equity, Inclusion and Accessibility: DOE strongly encourages efforts to reach historically underserved populations, racial minorities, and women. These strategies should create the connectivity and conditions for growth where they may not exist, such as in rural and underserved communities. The Program Narrative should articulate the strategy the State or Indian Tribe will use for sharing and maximizing the project's benefits across disadvantaged communities and include a discussion of how resident, worker, and community leadership will be engaged throughout the project's duration.

Provide an explanation of how the State or Indian Tribe will make such a determination for the projects that will be receiving funding and should include information on how the projects go beyond measures that are already being undertaken through current resilience planning by the State or Indian Tribe.

# Oregon's Equity Approach

ODOE will carefully follow an equity approach in program development and administration with a long-term focus on further refining its approach in this area over future years, with a goal of ensuring alignment with the Justice40 initiative.

In the application stage ODOE sent formal letters to the Chairs of each nine federally recognized tribes offering to coordinate applications or provide any technical assistance the state may be able to offer to Tribes considering an application under this program. ODOE intends to extend this offer of support to the federally recognized tribes throughout the life of the program.

ODOE intends to work with communities during the first year of the program to identify projects of interest and identify technical assistance needs so future projects can be developed that directly benefit disadvantaged and Tribal communities.

During this first year of the program, ODOE seeks to understand how projects can support efforts related to employment, women and minority-owned firms, disadvantaged communities and Tribal communities. The information collected from this initial program year will inform future activities. This will be accomplished in part through convening an advisory committee to review the approach for year one, consider lessons learned, and propose objectives, criteria, and metrics for years 2-5 that support an all-hazards approach that centers disadvantaged communities and ensures meaningful engagement by utility applicants with residents, workers, and leaders in these communities in development of future project applications.

At a minimum during the first year of the program, project proposals seeking to be prioritized due to their location and benefits to disadvantaged and/or Tribal communities will need to provide as part of their application a robust plan for community engagement and evidence of existing community support for the proposed project. All project applicants will be required to report on equity metrics.

#### Quality Jobs:

In support of quality jobs, ODOE will ensure that the requirements of the Davis-Bacon Act are fulfilled. In addition to Davis-Bacon reporting, additional metrics related to the diversity of the workforce or COBID certified firms may be identified for reporting purposes to inform future year activities.

ODOE recognizes that workforce is a significant challenge for utilities and will work to identify opportunities in future years of the program to support training, recruitment, retention, and reskilling of skilled and properly credentialed workers to perform work required for grid resilience.

# Community Benefits:

Oregon has determined that projects meeting the above criteria will provide the greatest community benefit, at least at this initial stage.

Wildfires pose a risk that crosses geographical boundaries, census tracts, and impacts Oregonians of all social and economic statuses. A mitigation effort that helps prevent fire, or limits wildfire spread will benefit communities directly affected and at risk of wildfire as well as surrounding communities.

However, the consequences of wildfire damage are often far more devasting to families without sufficient means to rebuild their homes after loss. It is for this reason that ODOE has chosen to prioritize wildfire related activities and activities in disadvantaged communities during this initial year of the program.

#### Diversity, Equity, Inclusion and Accessibility:

In the first year of this program, as described above, this program will support resilience investments by utilities that are likely to mitigate wildfire risk or support disadvantaged communities. Under state law, all electric utilities were required to submit wildfire mitigation plans to the Oregon Public Utility Commission no later than June 30, 2022. This program can potentially fund the activities identified by those plans to jump start private investment in wildfire mitigation.

In year one applications, ODOE will seek information from applicants on benefits to disadvantaged communities, workforce diversity, and community engagement in order to inform the agency's approach to future funding years, enabling ODOE to go beyond the current measures in future years.

In addition to funding projects in year one of this program, ODOE seeks to identify and engage with disadvantaged communities to identify their interests in resilience investments and needs for technical assistance. Future objectives and metrics may consider more fully plans for diversifying the workforce, supporting COBID certified firms, considering the needs and desires of community members, and representation from community leadership.

#### 6. Technical Assistance and Administration:

*Provide a description of how the State or Indian Tribe intends to utilize up to 5 percent of Federal grant funds for project administration and technical assistance.* 

ODOE will use up to 5% of the available federal funding to support administration, technical assistance and public information sharing regarding the investments.

This funding will support ODOE personnel to administer the contractual and financial aspects of the program, meet all reporting requirements, and select and award subrecipients following the criteria and methods provided within this application.

ODOE may also procure contracted support to assist with planning, meeting facilitation, outreach, and other activities supportive of the state's plan to refine the program in future years. ODOE will carefully consider how these activities can further the state's commitment to serving historically underserved communities in alignment with the Justice40 initiative.

#### 7. Public Notice and Hearing:

Public Notice and Hearing: Section 40101(d)(2)(B)(ii) requires that eligible applicants give notice and undertake a public hearing to review the criteria and methods they anticipate using to grant awards to eligible entities and the proposed funding distributions and recipients of the grant awards to eligible entities. The applicant should use the public hearing to share the approach envisioned for setting objectives and metrics and the proposed funding distributions and recipients of the grant awards to eligible entities. Provide a brief description of the notice and public hearing process, including the number and types of organizations that attended. Also, report on the outcome of the public hearing such as approaches for engaging stakeholders for establishing formal objectives and metrics and for implementing strategic planning processes. Provide a copy of the notice as an attachment to the Program Narrative.

ODOE conducted stakeholder engagement with the state's investor-owned utilities and consumer-owned utilities, several community-based organizations, and other state agencies to solicit informal feedback on straw proposals, prior to the development of the draft presented at the public hearing.

ODOE provided the public notice two weeks prior to the public hearing, using an email notification sent to 5,459 individual email addresses. The notice was also posted on ODOE's public facing website. The materials presented were published on ODOE's website one week in advance of the public hearing.

(ODOE will add additional information to be developed after the public hearing)

**Note:** DOE anticipates that the Program Narrative will be between 5 and 15 pages, depending upon the grant amount and complexity of resilience activities. DOE may reject applications and require revisions, if it determines that the program narrative lacks sufficient detail or does not comply with stated requirements. Save the information in a single file named (APPLICANT NAME PROGRAM NARRATIVE.pdf).