

PMC-ND

(1.08.09.13)

**U.S. DEPARTMENT OF ENERGY  
OFFICE OF ENERGY EFFICIENCY AND RENEWABLE ENERGY  
NEPA DETERMINATION**



RECIPIENT: Cogenra Solar, Inc.

STATE: CA

**PROJECT TITLE** A New Slate: Catalyzing PV Manufacturing in the US with Cogenra Solar's Next-Generation Dense Cell Interconnect PV Module Manufacturing Technology

Funding Opportunity Announcement Number	Procurement Instrument Number	NEPA Control Number	CID Number
DE-FOA-0001225, SunShot Technology to Market (Incubator Round 10, SolarMaT Round 3, SUNPATH Round 2).	DE-EE0007190	GFO-0007190-001	

Based on my review of the information concerning the proposed action, as NEPA Compliance Officer (authorized under DOE Order 451.1A), I have made the following determination:

**CX, EA, EIS APPENDIX AND NUMBER:**

Description:

- A9 Information gathering, analysis, and dissemination** Information gathering (including, but not limited to, literature surveys, inventories, site visits, and audits), data analysis (including, but not limited to, computer modeling), document preparation (including, but not limited to, conceptual design, feasibility studies, and analytical energy supply and demand studies), and information dissemination (including, but not limited to, document publication and distribution, and classroom training and informational programs), but not including site characterization or environmental monitoring. (See also B3.1 of appendix B to this subpart.)
- B3.6 Small-scale research and development, laboratory operations, and pilot projects** Siting, construction, modification, operation, and decommissioning of facilities for smallscale research and development projects; conventional laboratory operations (such as preparation of chemical standards and sample analysis); and small-scale pilot projects (generally less than 2 years) frequently conducted to verify a concept before demonstration actions, provided that construction or modification would be within or contiguous to a previously disturbed or developed area (where active utilities and currently used roads are readily accessible). Not included in this category are demonstration actions, meaning actions that are undertaken at a scale to show whether a technology would be viable on a larger scale and suitable for commercial deployment.

Rationale for determination:

The U.S. Department of Energy (DOE) is proposing to provide federal funding to Cogenra Solar, Inc. to develop, optimize and demonstrate a first-of-kind 50 MW/year PV module manufacturing line based on the company's innovative Dense Cell Interconnect (DCI) technology.

Proposed project activities would include computer modeling, data collection and analysis, the development, building and testing of a pilot-scale manufacturing line that assembles individual PV cells into modules, and field deployment of assembled modules into flagship demonstration projects through installer partners. Work would occur indoors at the Cogenra facility in Fremont, CA which is located in an industrial/commercial use area. The infrastructure and equipment used to operate the manufacturing line would consist of the necessary utilities, ventilation, mounting systems, robots and conveyors and would be purchased then installed at the existing facility as part of the proposed project. Existing corporate health and safety policies and procedures would be followed including employee training, proper protective equipment, engineering controls, monitoring, and internal assessments. The facility in which assembly would occur is purpose-built for the type of activities being proposed; therefore, no adverse impacts to sensitive resources are expected as a result of the proposed project. The facility has all applicable permits in place, and would not need additional permits for the proposed activities.

Assembled modules would be certificated and re-certificated to Underwriters Laboratories (UL) standards in an established facility by an independent, third-party sub-contractor. The partners and locations for field deployment demonstration projects are currently unknown; therefore, this activity is prohibited until DOE has completed an additional NEPA review.

Based on review of the project information and the above analysis, DOE has determined that the proposed project would not have a significant individual or cumulative impact to human health and/or environment. DOE has determined the proposed project is consistent with actions contained in DOE categorical exclusion A9 "information gathering, analysis and dissemination," and B3.6 "small-scale research and development, laboratory operations and

pilot projects" and is categorically excluded from further NEPA review.

**NEPA PROVISION**

DOE has made a conditional NEPA determination for this award, and funding for certain tasks under this award is contingent upon the final NEPA determination.

Insert the following language in the award:

You are restricted from taking any action using federal funds, which would have an adverse affect on the environment or limit the choice of reasonable alternatives prior to DOE/NNSA providing either a NEPA clearance or a final NEPA decision regarding the project.

Prohibited actions include:

Sub-task 4.4. Assess field performance.

This restriction does not preclude you from:

All other Tasks and Subtasks as listed in the Statement of Project Objectives.

If you move forward with activities that are not authorized for federal funding by the DOE Contracting Officer in advance of the final NEPA decision, you are doing so at risk of not receiving federal funding and such costs may not be recognized as allowable cost share.

Insert the following language in the award:

You are required to:

The recipient is required to submit specific location information for deployments described in Subtask 4.4 to DOE for additional NEPA review prior to beginning work on those activities. DOE may determine that an environmental assessment or environmental impact statement is required based on the information submitted.

Note to Specialist :

Solar Energy Technologies Office

This NEPA determination requires a tailored NEPA provision. Please see above.

Review completed by Logan Sholar on 8/31/2015

**SIGNATURE OF THIS MEMORANDUM CONSTITUTES A RECORD OF THIS DECISION.**

NEPA Compliance Officer Signature:

  
NEPA Compliance Officer

Date:

9/10/2015

**FIELD OFFICE MANAGER DETERMINATION**

Field Office Manager review required

**NCO REQUESTS THE FIELD OFFICE MANAGER REVIEW FOR THE FOLLOWING REASON:**

- Proposed action fits within a categorical exclusion but involves a high profile or controversial issue that warrants Field Office Manager's attention.
- Proposed action falls within an EA or EIS category and therefore requires Field Office Manager's review and determination.

**BASED ON MY REVIEW I CONCUR WITH THE DETERMINATION OF THE NCO :**

Field Office Manager's Signature:

\_\_\_\_\_  
Field Office Manager

Date:

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