

PMC-ND

(1.08.09.13)

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



RECIPIENT: Genbright LLC

STATE: MA

PROJECT TITLE : Achieving Ubiquitous Solar through Market Transformation and Grid Integration

Funding Opportunity Announcement Number	Procurement Instrument Number	NEPA Control Number	CID Number
DE-FOA-0001400	DE-EE0007589	GFO-0007589-002	G07589

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.)

A11 Technical advice and assistance to organizations Technical advice and planning assistance to international, national, state, and local organizations.

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 Genbright LLC to develop and test software for a scalable commercial platform capable of integrating solar and other Distributed Energy Resources (DERs) into different utility and electricity markets.

A previous conditional NEPA Determination (GFO-0007589-001; CXs A9, A11, B3.6; 08/18/16) reviewed project activities associated with Tasks 1, 2 and 4-6 in addition to subtask 3.1 ("Identify Sites") but restricted all other subtasks of Task 3 ("Demonstration and Deployment") pending the identification of energy facilities at which to implement Genbright's software platform. This is because Task 3 in the Statement of Project Objectives (SOPO) included the potential construction of new facilities in addition to the modification of existing DERs selected from Genbright's portfolio of assets.

Since that time, completed work under this award has led to the creation of software that can remotely communicate with and control DERs, such as solar power plants. As a result of this development that minimizes the physical requirements for real-world validation testing, the SOPO for this project has been modified concerning Task 3. Specifically, the project has been down-scoped to exclude any and all proposed activities relating to the construction of new facilities. Further, Task 3 would no longer entail any physical modifications to existing assets selected for deployment. Instead, in order to validate software functionality, Genbright would remotely link to the communications and controls portals of established facilities that would not require any type of equipment installations to accommodate the platform. The facilities' data repository accessed via this interface would be integrated into various existing ISO, utility, and third party products and programs.

Task 3 of the proposed project would now be limited to desktop work at Genbright's offices (Hingham, MA) related to site identification and temporary remote management. Associated activities would include data analysis, software development, computer modeling, outreach, and technical advice/assistance. Remaining Task 3.1 activities would identify only sites with previously installed electrical generation units (either in commercial operation already or undergoing development unrelated to the proposed project) and information sharing technologies; therefore Task 3

software deployment activities would not result in any physical modification of existing units nor the facilities in which they are located. No new permits would be required for these activities, which would not change the use or mission of existing facilities.

The recipient has identified one existing asset that would be interfaced with during Task 3. Agawam Solar is an existing solar energy facility located on town land in West Springfield, MA. Other candidate sites have not yet been formally selected, including a number of assets in different stages of development. The ongoing and future development of these facilities is not dependent upon the potential implementation of Genbright's software. For Agawam Solar and all deployment sites identified in the course of Task 3, the integration of Genbright's software platform would be purely virtual, comprised of the exchange of data and signals. No field activities would be required.

Based on the review of the proposal, DOE has determined the proposal fits within the class of action(s) and the integral elements of Appendix B to Subpart D of 10 CFR 1021 outlined in the DOE categorical exclusion(s) selected above. DOE has also determined that: (1) there are no extraordinary circumstances (as defined by 10 CFR 1021.410(2)) related to the proposal that may affect the significance of the environmental effects of the proposal; (2) the proposal has not been segmented to meet the definition of a categorical exclusion; and (3) the proposal is not connected to other actions with potentially significant impacts, related to other proposals with cumulatively significant actions, or an improper interim action. This proposal is categorically excluded from further NEPA review.

NEPA PROVISION

DOE has made a final NEPA determination for this award

Insert the following language in the award:

If the Recipient intends to make changes to the scope or objective of this project, the Recipient is required to contact the Project Officer, identified in Block 15 of the Assistance Agreement before proceeding. The Recipient must receive notification of approval from the DOE Contracting Officer prior to commencing with work beyond that currently approved. If the Recipient moves forward with activities that are not authorized for Federal funding by the DOE Contracting Officer in advance of a final NEPA decision, the Recipient is doing so at risk of not receiving Federal funding and such costs may not be recognized as allowable cost share.

Note to Specialist :

Solar Energy Technologies Office

This NEPA determination does not require a tailored NEPA Provision.

NEPA review completed by Whitney Doss, 04/10/18

SIGNATURE OF THIS MEMORANDUM CONSTITUTES A RECORD OF THIS DECISION.

NEPA Compliance Officer Signature: _____

 Electronically
Signed By: Kristin Kerwin
NEPA Compliance Officer

Date: 4/12/2018

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: _____