OFFICE OF INSPECTOR GENERAL

U.S. Department of Energy

SPECIAL REPORT

DOE-OIG-22-39 August 2022

PROSPECTIVE CONSIDERATIONS FOR CLEAN ENERGY DEMONSTRATION PROJECTS

Department of Energy
Washington, DC 20585

August 12, 2022

MEMORANDUM FOR THE SECRETARY

SUBJECT: Special Report on Prospective Considerations for Clean Energy Demonstration Projects

The *Infrastructure Investment and Jobs Act* (IIJA) was signed into law on November 15, 2021. In December 2021, the Department of Energy established the new Office of Clean Energy Demonstrations (OCED) to oversee the $21.5 billion in IIJA funding for clean energy demonstration projects for innovative technologies like clean hydrogen, carbon capture, grid-scale energy storage, and advanced nuclear reactors. Demonstration projects test the effectiveness of innovative technologies in real-world conditions at scale, often leveraging public-private partnerships to pave the way towards commercialization and widespread deployment. Under IIJA, funding for OCED projects will be distributed through financial assistance awards in the form of grants and cooperative agreements.

When we met on February 3, 2022, I committed to sharing with Department leadership any historic reports that may serve to improve internal controls to help prevent fraud, waste, and abuse as the Department launches its many projects funded by the IIJA. The $21.5 billion in IIJA funding for clean energy demonstration projects prompted this report. However, the Office of Inspector General notes the *Inflation Reduction Act of 2022*, if enacted, is expected to authorize $25 billion in new spending authority for the Department's energy security programs, including an additional $5.8 billion for energy demonstrations under the OCED.[1]

Based on our review of prior audit work,[2] we identified five major risk areas that warrant immediate attention and consideration from Department leadership to prevent similar problems from recurring. Specifically:

- Insufficient Federal Staffing: Prior audit reports identify that insufficient Federal staffing adversely affected the Department's ability to administer financial assistance awards, the primary mechanism for funding demonstration projects. Issued reports show that key oversight functions such as invoice reviews were not performed due to limited staffing and heavy workloads of project oversight officials. These reports demonstrate the need

[1] In addition to the *Inflation Reduction Act of 2022*, the *CHIPS and Science Act of 2022* is expected to increase the Department's budget more than $30 billion over baseline plans for infrastructure improvements at the 17 National Laboratories, research and development programs, artificial intelligence, advanced manufacturing, and other priorities. It is not clear at this time whether any of these funds may be administered by OCED.
[2] The body of work reviewed includes audit reports on Department programs that provided financial assistance awards for demonstration, deployment, or commercialization projects in areas such as carbon capture and storage, hydrogen and fuel cells, and hydropower.

for sufficient staffing to ensure key Federal oversight functions are performed and the Government is adequately protected.

- Circumvention of Project Controls: We identified prior Office of Inspector General and Government Accountability Office reports demonstrating instances when the Department bypassed project controls such as performance milestones, budget phases, and cost share requirements[3] put in place to mitigate technical and financial risks. Issued reports identify projects where the Department decreased the recipient's cost share requirement below the percentage defined in the original cooperative agreement and increased the Government's cost share to compensate. The reports also show that the Department increased early-phase budget allocations multiple times by shifting allocations from subsequent phases to provide continued support when projects were unable to meet milestones. In addition, reports identify instances when the Department selected projects despite significant financial or technical issues identified during the merit review process,[4] issues that ultimately impacted the success of the projects. These actions circumvented project controls implemented to protect the Government and taxpayers and increased the Department's financial exposure. The reports emphasize the importance of adhering to project controls to mitigate risk.

- Insufficient Oversight of Projects: In prior reports, we observed insufficient financial monitoring of recipient costs and cost share contributions which increased the risk that questionable or unallowable costs could be charged to the Department, reducing the amount of funds available to complete projects. Additionally, we identified instances when the Department had not ensured that project deliverables such as annual independent audits or final project reports had been completed, as required, or coordinated with other programs to manage overlap and avoid duplication of research efforts. These reports demonstrate a need for more stringent monitoring of clean energy projects awarded under financial assistance agreements.

- Inadequate Internal Controls: Prior audit reports reveal inadequate internal controls related to oversight of financial aspects of assistance awards. In particular, we identified a lack of comprehensive policies and procedures defining the level of invoice review or documentation needed prior to reimbursement. In addition, these reports reveal inadequate controls related to areas such as record-keeping practices, consideration of findings from prior audits of recipient accounting systems, and reviews of recipient-level procurement practices. These reports emphasize the importance of a comprehensive internal control system to ensure that the Government and taxpayers are protected from reimbursing questionable or unallowable recipient costs.

[3] Cost sharing or matching is that portion of the project or program costs that are not paid by the funding agency. Cost sharing includes all contributions including cash and in-kind that a recipient makes to an award.
[4] The purpose of a merit review is to provide an independent assessment of the technical or scientific merit of an eligible and responsive application for financial assistance. Merit reviews are performed by persons who have knowledge and expertise in the technical or scientific fields identified or presented in applications submitted to the Department.

- Lack of Recipient-Level Controls: Prior audit reports show that the Department had not ensured that recipient procurement practices were adequate to fully protect the Government's interests and complied with applicable policies, procedures, and best practices. We identified instances when the Department had not ensured recipients had effective accounting controls and financial systems in place to adequately segregate and accumulate costs. Additionally, these reports identify examples where the Department had not ensured that recipient subcontractor or vendor selections for goods and services represented the best value to the Government or recipient subcontractor costs were adequately supported. These reports indicate a need for more rigorous monitoring and oversight of recipient-level activities.

It is imperative that Department leadership recognize the immense risks associated with these new programs and take assertive steps to mitigate the risks. Further, risks are compounded by the magnitude of the projects and funding. We strongly suggest that Department leadership identify and set aside sufficient resources for full Federal program staffing, as well as sufficient resources to build robust internal controls and independent oversight systems to prevent and detect foreseeable issues to ensure the Government and taxpayers are protected.

Teri L. Donaldson
Inspector General

cc: Deputy Secretary
Chief of Staff

SUMMARY OF ISSUES ON MANAGEMENT OF DEMONSTRATION PROJECTS

After reviewing prior reports and casework related to the Department of Energy's management of financial assistance awards for demonstration projects, the Office of Inspector General (OIG) identified five broad areas that warrant additional attention from senior Department leadership as it moves forward with *Infrastructure Investment and Jobs Act* funded demonstration projects under the Office of Clean Energy Demonstrations. These areas include:

- Insufficient Federal Staffing
- Circumvention of Project Controls
- Insufficient Oversight of Projects
- Inadequate Internal Controls
- Lack of Recipient-Level Controls

As a result of the previous OIG and Government Accountability Office (GAO) efforts, we have identified prospective considerations that the Office of Clean Energy Demonstrations leadership should consider to enhance internal controls to help prevent fraud, waste, and abuse.

INSUFFICENT FEDERAL STAFFING

Prior audit reports identify that insufficient Federal staffing adversely affected the Department's ability to administer clean energy demonstration projects funded through financial assistance awards. Issued reports show that key oversight functions such as invoice reviews were not performed due to limited staffing and heavy workloads of project oversight officials. These reports demonstrate the need for sufficient staffing to ensure key Federal oversight functions are performed and the Government is adequately protected. For example:

- Our May 2016 report[5] on cooperative agreements for small modular reactors identifies over $480,000 in unallowable costs, including rent payments, relocation, travel, and labor costs, that the Department reimbursed to award recipients. The report notes that invoice reviews should have caught the questionable costs identified; however, limited staffing and high workloads contributed to the errors being overlooked.

- In our March 2013 report[6] on industrial carbon capture and storage projects, we found that the Department reimbursed financial assistance recipients approximately $16.8 million without obtaining or reviewing adequate supporting documentation. The report notes that Contract Specialists responsible for approving reimbursement requests expressed concerns with being overwhelmed by their workload and not having time to sufficiently review costs for every project.

[5] Audit Report on *The Department of Energy's Small Modular Reactor Licensing Technical Support Program* (OAI-M-16-11, May 2016).
[6] Audit Report on *The Department of Energy's Industrial Carbon Capture and Storage Program Funded by the American Recovery and Reinvestment Act* (OAS-RA-13-15, March 2013).

CIRCUMVENTION OF PROJECT CONTROLS

We identified prior OIG and GAO reports demonstrating instances when the Department bypassed project controls such as performance milestones, budget phases, and cost share requirements put in place to mitigate technical and financial risks. Issued reports identify projects where the Department decreased the recipient's cost share requirement below the percentage defined in the original cooperative agreement and increased the Government's cost share to compensate. These reports also show that the Department increased early-phase budget allocations multiple times by shifting allocations from subsequent phases to provide continued support when projects were unable to meet milestones. In addition, these reports identify instances when the Department selected projects despite significant financial or technical issues identified during the merit review process, issues that ultimately impacted the success of the projects. These actions circumvented project controls implemented to protect the Government and taxpayers and increased the Department's financial exposure. These reports emphasize the importance of adhering to project controls to mitigate risk. For example:

- Our April 2016 report[7] on the Department's continued support of the Texas Clean Energy Project shows that the Department circumvented controls put in place to mitigate its financial exposure. As a risk mitigation measure, the Department had established ceilings for its expenditures during each of the four project phases to limit its financial exposure to set amounts until the project reached certain milestones. The cooperative agreement limited the Department's Phase 1 contributions to $15 million, with additional contributions withheld until the recipient secured financing and entered Phase 2 design. However, the Department invested almost $116 million in Federal funds in the project during Phase 1, exceeding its original Phase 1 commitment by over $100 million, even though project milestones had not been met. In addition, we found that the Department incorporated additional risk mitigation measures into the agreement; however, the Department failed to enforce them. Specifically, the Department incorporated milestones into the cooperative agreement that had to be completed by specific dates for the project to receive additional funding. Despite the recipient's inability to meet established milestones, the Department continued to support and provide funds for the project.

- In our February 2018 report[8] on oversight of the Texas Clean Energy Project, we found that the Department had not effectively implemented ongoing invoice review controls it put in place to manage the risks associated with the complex project. Due to the high-risk nature of the project, the Department made a decision to put the recipient on the reimbursement method of payment in which the recipient was to provide documentation of its expenditures before periodic reimbursement or acceptance of reported cost-share contributions. Despite the risk, we identified numerous instances when expenditures, valued at over $38 million, were continuously approved without obtaining or reviewing the adequate detailed information necessary to track and evaluate progress.

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[7] Special Report on *The Department of Energy's Continued Support of the Texas Clean Energy Project Under the Clean Coal Power Initiative* (OIG-SR-16-02, April 2016).
[8] Audit Report on *The Office of Fossil Energy's Oversight of the Texas Clean Energy Project Under the Clean Coal Power Initiative* (DOE-OIG-18-17, February 2018).

- The GAO's December 2021 report[9] on management of carbon capture and storage demonstration projects shows that the Department, at the direction of senior leadership, had not adhered to cost controls designed to limit its financial exposure on funding agreements for coal projects. For each project reviewed, GAO found that the Department decreased the project's cost share requirement below the percentage defined in the original cooperative agreement and increased the Government's cost share to compensate, noting that decreases were authorized in some instances even after identifying significant risks to project success. GAO also found that the Department increased early-phase funding targets multiple times by shifting budget allocations from subsequent phases to provide continued support when projects were unable to meet milestones, resulting in an average of about $51 million in Department cost share per project being moved forward. The GAO concluded that the Department's actions, in not consistently adhering to cost controls designed to mitigate its financial exposure if projects did not meet their performance milestones, resulted in nearly half a billion dollars spent on four unbuilt coal demonstration projects.

- Our September 2013 report[10] on integrated biorefinery projects found that the Department awarded funding for projects even though the merit review noted that none of the projects fully met the selection criteria identified in the Funding Opportunity Announcement, and each of the proposed projects possessed high-risk elements. In particular, the report shows that the Department awarded funding for commercial-scale projects although the proposed technology had not been fully validated at pilot-scale or demonstration-scale facilities, and merit reviewers identified significant technical issues. Despite the technical concerns, the Department more than doubled the available funding called for in the Funding Opportunity Announcement for the projects, from $160 million to $385 million. The report concludes that because selected projects were not at the level of technical readiness needed for commercial development, the Department had not achieved its biorefinery development and production goals.

INSUFFICIENT OVERSIGHT OF PROJECTS

We identified audit reports highlighting insufficient oversight of demonstration projects. In particular, we observed inadequate financial monitoring of recipient costs and cost share contributions which increased the risk that questionable or unallowable costs could be charged to the Department, reducing the amount of funds available to complete projects. Additionally, these reports identify instances when the Department had not ensured that project deliverables such as annual independent audits or final project reports had been completed as required or coordinated with other programs to manage overlap and avoid duplication of research efforts. These reports demonstrate a need for more stringent monitoring of projects awarded under financial assistance agreements. For example:

[9] Report to Congressional Committees on *Carbon Capture and Storage: Actions Needed to Improve DOE Management of Demonstration Projects* (GAO-22-105111, December 2021).
[10] Audit Report on *Follow-up Audit of the Department of Energy's Financial Assistance for Integrated Biorefinery Projects* (IG-0893, September 2013).

- In our February 2018 report[11] on oversight of the Texas Clean Energy Project, we found that the Department approved over $38 million in expenditures without obtaining or reviewing adequate detail. This included approximately $16.9 million in subcontractor costs supported by invoices that did not include details on the nature of services provided; over $8.2 million in subcontractor costs supported by invoices that were not in U.S. currency and did not contain details regarding the actual exchange rate in effect at the time of payment; and approximately $2.9 million in subcontractor and consultant costs charged to the project that were unsubstantiated. Additionally, we identified concerns with certain amounts reported by the recipient as part of its cost share. In particular, we determined that the recipient overstated the value of cost share associated with a land purchase by $384,000. The recipient had claimed its cost share in the amount of $480,000 for the value of the land; however, the Department had reimbursed the recipient 80 percent or $384,000 for the purchase of land for the project, and the recipient had not deducted the Federal reimbursement from the total value of the land it claimed for cost share.

- In our January 2013 report[12] on the Department's Smart Grid Demonstration Program, we found that reimbursements totaling about $12.3 million were approved despite a lack of supporting documentation necessary to verify costs were incurred and reasonable. The report notes that contrary to award terms and conditions, two recipients included in the audit were reimbursed for claims based on estimated rather than actual costs, resulting in overpayments of approximately $9.9 million. In addition, the report shows that although Federal regulations specifically prohibit using Federal funds and previous recipient contributions toward meeting cost share requirements, the Department approved a recipient's plan to use about $28 million in expected proceeds from the sale of an energy storage unit, manufactured in part with Federal funds and previous recipient contributions to meet its overall $32.7 million cost share requirement.

- Our October 2016 report[13] on the Geothermal Technologies Office shows that the Department had not always obtained deliverables required in financial assistance award terms. Recipients included in the audit had not submitted a final report or technical data in accordance with award terms. The report concludes that without the technical information from crucial final deliverables and research data submissions, the Department could not fully demonstrate performance had been achieved as expected, or if program objectives and goals had been met. Further, valuable research and development supported with Federal funding were not made publicly available to maximize the leveraging of Department investments. As a result, taxpayer dollars may be wasted in the future by unknowingly duplicating research and development.

- In our June 2014 report[14] on the Department's Water Power Program, we found that over half of the for-profit recipients included in the review had not completed and submitted

[11] See supra Note 8.
[12] Audit Report on *The Department of Energy's $700 Million Smart Grid Demonstration Program Funded through the American Recovery and Reinvestment Act of 2009* (OAS-RA-13-08, January 2013).
[13] Audit Report on *Followup on the Geothermal Technologies Office* (OAI-M-17-01, October 2016).
[14] Audit Report on *The Department of Energy's Water Power Program* (OAS-M-14-07, June 2014).

annual compliance audits as required. The purpose of these required audits is to determine whether a recipient has internal controls in place to provide reasonable assurance of compliance with Federal laws and regulations and the terms and conditions of the award. The report concludes that by not enforcing audit compliance, the program could not be assured that recipients had internal controls in place to ensure compliance with Federal regulations, and the terms and conditions of their awards.

- Our January 2013 audit report[15] on the Department's Smart Grid Demonstration Program identifies weaknesses in coordination efforts with another Department program. Specifically, the report shows that the Department awarded a recipient $14 million for a project even though the recipient had received $2 million under the Advanced Research Projects Agency – Energy Program for similar work. The report notes that the recipient, unknown to the Department until our audit, had reported the same accomplishments under both awards. According to the report, even though both program offices were aware the recipient had received funding for potentially overlapping projects, they had not coordinated their oversight activities.

INADEQUATE INTERNAL CONTROLS

Prior audit reports reveal inadequate internal controls related to oversight of financial aspects of clean energy projects. In particular, we identified a lack of comprehensive policies and procedures defining the level of invoice review or documentation needed prior to reimbursement. These reports also reveal inadequate controls related to areas such as record-keeping practices, consideration of findings from prior audits of recipient accounting systems, and reviews of recipient-level procurement practices. These reports emphasize the importance of a comprehensive internal control system to ensure that the Government and taxpayers are protected from reimbursing questionable or unallowable recipient costs. For example:

- In our June 2014 report[16] on the Advanced Manufacturing Office, we found that the Department had not developed criteria or defined a standard level of documentation needed to ensure an efficient or consistent review of project costs. The report identifies that for recipients included in the review that had been placed on the reimbursement method of payment, program officials requested varying levels of supporting documentation to substantiate project costs and, in some cases, only received summary spreadsheets listing budget cost categories. The report notes that the extent of backup documentation required to substantiate reimbursement requests is determined jointly by the Project Officer and Contract Specialist at the onset of each award, and their decisions were not typically documented. In addition, we found that the program lacked internal controls to ensure policies and procedures, which require analysis and significant decisions be adequately documented and maintained, were followed.

[15] See supra Note 12.
[16] Audit Report on *Selected Aspects of the Office of Energy Efficiency and Renewable Energy's Advanced Manufacturing Office* (OAS-RA-14-04, June 2014).

- Our June 2014 report[17] on the Department's Water Power Program shows that the program did not have a process in place to modify the payment terms and conditions of previously negotiated awards when accounting system weaknesses were subsequently identified after a more recent award was made. As a result, the program assumed a higher risk of unallowable costs being submitted by a recipient. In addition, the report shows that the program had not established a process to identify for-profit recipients that met the threshold for completing required compliance audits which resulted in the audits not being performed. As noted earlier, by not enforcing audit compliance, the program could not be assured that recipients had internal controls in place to ensure compliance with Federal regulations and the terms and conditions of their awards.

- In our June 2013 report[18] on the modified cooperative agreement for the Hydrogen Energy California Project, we found that although the Department had policies and procedures governing the review and approval of original financial assistance awards, there was no guidance governing the extent of support or review required for changes in the ownership and terms of a project. As a result, the report identifies that the Department had not obtained and reviewed recipient documentation to substantiate key projections in the financial model used to support approval of the modified $4 billion agreement. The financial model is routinely required by the Department for projects of this nature and used to demonstrate the financial viability of the project based on projected revenues and expenditures.

- Our March 2013 report[19] on industrial carbon capture and storage projects shows that policies and procedures related to managing the projects were either not developed or not fully implemented. In particular, the report notes that the Department had not developed formal policies and procedures requiring officials to evaluate or seek resolution of apparent-related party transactions or potential conflicts of interest. In addition, we found that the Department had not established policies requiring a review of procurement practices to ensure selections made by recipients were appropriate and in accordance with relevant policies and procedures.

LACK OF RECIPIENT-LEVEL CONTROLS

Prior audit reports show that the Department had not ensured that recipient procurement practices were adequate to fully protect the Government's interests and complied with applicable policies, procedures, and best practices. We identified instances when the Department had not ensured recipients had effective accounting controls and financial systems in place to adequately segregate and accumulate costs. Additionally, reports identify examples where the Department had not ensured that recipient subcontractor or vendor selections for goods and services represented the best value to the Government or recipient subcontractor costs were adequately supported. These reports indicate a need for more rigorous monitoring and oversight of recipient-level activities. For example:

[17] See supra Note 14.
[18] Audit Report on *The Hydrogen Energy California Project* (OAS-RA-13-22, June 2013).
[19] See supra Note 6.

- In our March 2013 report[20] on industrial carbon capture and storage projects, we found that procurement practices for recipients reviewed did not adequately ensure that subcontractor or vendor selections made by recipients represented the best value to the Government and were in accordance with relevant policies and procedures. Specifically, recipients that we reviewed had not always documented their selections or sole source justifications, especially for instances in which the selections did not represent arm's-length transactions. In total, we identified over $4.1 million in recipient procurements that involved potential conflicts of interest. In each case, the recipients had provided information about the relationships to the Department that went undetected.

- Our September 2013 report[21] on financial assistance awards for hydrogen and fuel cell projects found that recipients had not always effectively purchased goods and services in a manner that protected the Department's interests. The report identifies that one recipient included in the review non-competitively awarded approximately $1 million for subcontract work to two companies that shared common ownership interests with the recipient. In addition, the report shows that recipients had not always utilized competition to obtain the best possible prices for goods and services purchased with Federal funds. For two of the recipients reviewed, we found examples of purchases valued at about $210,000 for materials, equipment, and services that were not supported by competitive bidding procedures.

PROSPECTIVE CONSIDERATIONS

As the Department moves forward with its clean energy demonstration projects funded under the *Infrastructure Investment and Jobs Act*, as well as any other appropriations, this report offers prospective considerations that Department leadership should consider to improve internal controls to prevent fraud, waste, and abuse. Considerations include:

- Allocate sufficient resources to enable the Department to conduct appropriate oversight of newly appropriated funds.

- Ensure Federal oversight staff is mindful of its stewardship responsibilities as the influx of funds is distributed to clean energy demonstration projects. Additionally, under GAO's *Standards for Internal Control in the Federal Government* (GAO-14-704G, September 2014), the Department, not the OIG, is ultimately responsible for ensuring that recipient costs are reasonable and allowable in accordance with applicable regulations.

- Ensure that project controls put in place to protect the Government and taxpayers are enforced.

- Reinforce the implementation of award terms to ensure the submission of required deliverables.

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[20] See supra Note 6.
[21] Audit Report on *The Department of Energy's Hydrogen and Fuel Cells Program* (OAS-RA-13-31, September 2013).

- Develop a comprehensive set of policies and procedures for overseeing all financial aspects of clean energy demonstration projects that include defining a standard level of documentation needed to ensure an efficient and consistent review of project costs and oversight activities related to recipient procurement practices.

- Ensure recipients are aware of their programmatic and statutory responsibilities as beneficiaries of Federal funding.

Appendix 1: Related Reports

Office of Inspector General

- *The Office of Fossil Energy's Oversight of the Texas Clean Energy Project Under the Clean Coal Power Initiative* (DOE-OIG-18-17, February 2018)
- *Followup on the Geothermal Technologies Office* (OAI-M-17-01, October 2016)
- *The Department of Energy's Small Modular Reactor Licensing Technical Support Program* (OAI-M-16-11, May 2016)
- *The Department of Energy's Continued Support of the Texas Clean Energy Project Under the Clean Coal Power Initiative* (OIG-SR-16-02, April 2016)
- *The Department of Energy's Water Power Program* (OAS-M-14-07, June 2014)
- *Selected Activities of the Office of Energy Efficiency and Renewable Energy's Advanced Manufacturing Office* (OAS-RA-14-04, June 2014)
- *The Department of Energy's Hydrogen and Fuel Cells Program* (OAS-RA-13-31, September 2013)
- *Follow-up Audit of the Department of Energy's Financial Assistance for Integrated Biorefinery Projects* (IG-0893, September 2013)
- *The Hydrogen Energy California Project* (OAS-RA-13-22, June 2013)
- *The Department of Energy's Industrial Carbon Capture and Storage Program Funded by the American Recovery and Reinvestment Act* (OAS-RA-13-15, March 2013)
- *The Department of Energy's $700 Million Smart Grid Demonstration Program Funded through the American Recovery and Reinvestment Act of 2009* (OAS-RA-13-08, January 2013)

Government Accountability Office

- *Carbon Capture and Storage: Actions Needed to Improve DOE Management of Demonstration Projects* (GAO-22-105111, December 2021)
- *Advanced Fossil Energy: Information on DOE-Provided Funding for Research and Development Projects Started from Fiscal Years 2010 through 2017* (GAO-18-619, September 2018)

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