



GridWise Alliance Questions on Infrastructure Investment and Jobs Act Resilience Funds

The GridWise Alliance leads a diverse membership of electricity industry stakeholders focused on accelerating innovation that delivers a secure, reliable, resilient, and affordable grid to support decarbonization of the US economy. The Alliance and its members believe the grid provisions in the Investments and Infrastructure Jobs Act (IIJA) will be an historic investment to accelerate the deployment of technologies and systems to modernize and enhance the electric grid.

Due to our diverse membership, GridWise is well positioned to provide support on topics related to grid resiliency and reliability. On behalf of our members, we have prepared a set of questions focusing on the bill's two provisions most closely associated with these topics as a way to support decision makers as we collectively work to clarify and define how the IIJA is most effectively implemented.

GridWise Alliance Member Questions Regarding IIJA Section 40101, Preventing Outages and Enhancing the Resilience of The Electric Grid

Funding Questions

- How will DOE award funds that the bill directs should be dispersed over 5 years? Will programs issue one large FOA or multiple FOA's in subsequent years? If the latter, will DOE release a schedule of FOA topics the first year?
- Does DOE plan to issue an RFI to seek stakeholder input? If so, will separate RFIs address the funding administered by DOE/the states? What would be the anticipated timing?
- In 2008/2009, grants were capped at a certain amount. Will there be a similar cap for this program?
- What state agency will direct the funding at the state level and what will be the process/criteria for which projects get prioritized? Does it depend on the resiliency needs of the state?
- How can industry best support states in their efforts to use investments efficiently?
- What data will you require with respect to documenting the amount of money spent on previous mitigation for both the DOE grant program and the states? Who will be expected to provide the data?
- Disaster Recovery plans usually create duplicated infrastructure in different physical locations, ideally implementing synchronous systems replication to minimize recovery time and recovery point objectives in a disaster event. Sometimes it may take a long time to identify a sophisticated cyberattack, increasing the chance to replicate compromised data to secondary systems. Modern cyber security guidelines recommend companies to create a third instance of systems with limited or near-zero connectivity to the outside networks, commonly known as vaults. Vaults usually contain the infrastructure required to run essential services with asynchronous replication from the primary site and mechanisms that allow frequent and proactive data validation, mitigate data corruption risks, and improve the system's resilience. This section explicitly prohibits funding for

cybersecurity resilience projects, but can funds be used to fully fund procurement and deployment of grid equipment and software that includes embedded cyber protections?

- What are the reporting and oversight requirements if funding is granted for a resilience project?
- It appears that Congress would like DOE to weigh previous resilience investments strongly in grant decision-making. How will that affect small and medium utilities with limited resources that haven't had a robust resilience program in the past? Will that requirement apply to the rural utility carve-out?
- Would projects currently in queue or in progress be eligible for funds or would projects need to be new?

Timeline Questions

- The White House Guidebook indicated that these programs are anticipated to open Q4/by the end of the year. Can you provide any updates on timing and/or public workshops or webinars with further information?

Content Questions

- What are the general criteria categories that resilience projects will be evaluated by?
- Do monitoring and control technologies apply to transmission, distribution, distributed generation resources, and electric vehicle charge sites?
- Does the definition of a disruptive event include cyber-attacks and if so, can adaptive protection technologies include cybersecurity for the electric grid?
- Does undergrounding of electrical equipment include the communications systems and network needed for SCADA communications between substations?
- What criteria will apply to evaluating the use or construction of DER for enhancing system adaptive capacity during disruptive events and how will such criteria enable cost-effectiveness assessments between DER and conventional options in addressing electric grid resiliency?
- For the entities in smaller or underserved communities, will there be different criteria or technical assistance in crafting applications?

GridWise Alliance Member Questions Regarding IIJA Section 40103. Electric Grid Reliability and Resilience Research, Development, and Demonstration

Funding Questions

- How will DOE allocate funds across the spectrum of R&D and Demonstration projects?
- What guidance will states and local governments receive in terms of shaping the grants they make to electric sector owners and operators?
- What is the intended use of funds granted to state public utility commissions (PUCs)? What criteria will be used for evaluation?
 - What is the expectation for "implemented by and through public and rural electric cooperative entities on a cost-shared basis"? Will this include publicly regulated IOUs?
- Does DOE plan to issue an RFI to seek stakeholder input? What would be the anticipated timing?
- Can DOE provide more details on eligible areas for funding, expanding on section A and B under the Purpose? Do you plan to split eligible funding between the stated categories of transmission, storage, and distribution infrastructure?
- Would projects currently in queue or in progress be eligible for funds or would projects need to be new?
- In 2008/2009, grants were capped at a certain amount. Will there be a similar cap for this program?
- Will new technology companies be able to apply directly for R&D funds from states, or will they then need a utility partner?

Timeline Questions

- The White House Guidebook indicated that these programs are anticipated to open Q4/by the end of the year. Can you provide any updates on timing?

Content Questions

- How will DOE promote creative public-private partnerships with the Eligible Funding Entities to support the design and implementation of innovative demonstrations?
- Would a municipally owned utility qualify as a unit of local government for this program?
- Can these programs include national labs and universities as a part of these demonstration and R&D projects?
- How does DOE plan to define a demonstration project? For example, if a project has already been demonstrated in one area may the same type of project, but applied to a new location or in a new way, be eligible?
- For the entities in smaller or underserved communities, will there be different criteria or technical assistance in crafting applications?