GRANT FUNDING SERIES · EC-WP-907

Federal Grant Application Engineering for Energy Projects

Building federal energy grant applications that survive scoring and pre-award review.

Federal grant applications for energy projects do not get written. They get engineered. This reference walks through the discipline behind applications that score, updated for the October 2026 federal funding rules.

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Disclaimer & Legal Notice

This document is a long-form professional reference on the engineering of federal grant applications for energy projects. It is provided for general information and educational purposes only. It is not legal advice, lobbying advice, engineering advice, or a guarantee of any award outcome, and it may not be cited as authority in any audit, enforcement or award proceeding.

Award decisions are made by federal awarding agencies under the criteria in each notice of funding opportunity and reflect program-specific judgments outside any applicant's or consultant's control. Energy Compliance, Inc. supplies application strategy, narrative engineering, federal cross-cutting compliance documentation, and budget construction services. The substantive technical content of each application reflects the applicant's own project facts.

Statutes, regulations, executive orders and agency guidance cited here are stated as of October 25, 2026. Federal grant policy changed substantially in 2025 and continues to move: OMB has proposed a rewrite of the Uniform Guidance that was not final on that date. Program requirements, scoring rubrics and review processes also change with each funding cycle. Always work from the current solicitation, its amendments, and the current text of the regulations it incorporates.

Foreword

Federal grant applications for energy projects do not get written. They get engineered. The distinction matters. Writing produces a narrative. Engineering produces a structured document that satisfies a defined evaluation rubric, ties real project facts to the compliance language the program requires, and survives both technical review and the federal cross-cutting compliance review that runs alongside it. Most unsuccessful applications fail at the engineering step, not the writing step. The narrative was competent. Nothing was built underneath it. The reviewer scoring against a published rubric did not find what the rubric asked for, where the rubric expected it, with the evidence the rubric required.

This reference is part of the Energy Compliance, Inc. Grant Funding Series. It is written for the people who build federal energy grant applications at scale: the development VP at an independent power producer with several pursuits in the pipeline, the grants administrator at a municipal utility deciding whether to chase a competitive DOE program, the project lead at an electric cooperative weighing a USDA Rural Development application, the program manager at a state energy office that passes federal funding through to subrecipients. It is not written for grant writers in the marketing sense. Marketing writers chase awards through narrative polish. Engineering teams produce applications that score against rubrics, carry federal cross-cutting requirements as built-in evidence instead of appendix afterthoughts, and turn technical merit into a record a federal reviewer can use to defend the funding decision.

In my view, the application phase drives outcomes more than most applicants assume. A project with strong technical merit and a poorly engineered application loses to a project with adequate merit and a well-engineered one. The reviewer cannot see what is not in the document, and the reviewer is bound by the published evaluation criteria. So the application has to do its own work of putting the project in front of the reviewer in the form the reviewer is required to evaluate. The team that engineered the application did that work. The team that only wrote it hoped the reviewer would do the work for them. The reviewer almost never does.

In my view, the more attractive programs draw far more applications than they can fund, and the difference between a funded and an unfunded project is often a documentation difference rather than a substantive one. The engineering discipline is what closes that gap.

This reference is not marketing material dressed up as content. It is the application engineering protocol behind Energy Compliance, Inc.'s Federal Energy Funding and Grant Application Support. The Grant Funding Series exists in part because a strong project can lose a competition it should have won when the application is written instead of engineered. The discipline is teachable. Apply it well.

Rob Smith

Founder and Principal, Energy Compliance, Inc.

Executive Summary

A competitive federal energy application is an engineered document. It maps every scoring criterion to a section, anchors every claim to evidence, carries three to five win themes from the executive summary through the budget, and builds federal cross-cutting compliance into the narrative from the first draft. This reference walks through that discipline in eleven chapters, from reading the notice to filing the confirmation.

The method has not changed. The rules around it have, and an application built from a 2024 template will carry errors a 2026 reviewer will notice. The changes that matter most:

- **Justice40 and DOE Community Benefits Plans are gone.** Executive Order 14148 revoked Executive Order 14008, which created Justice40, on January 20, 2025. Three days later DOE Policy Flash 2025-16 rescinded DOE's Community Benefits Plan guidance and its Justice40 coding guidance, and directed that the associated terms and conditions no longer be used.
- **New review layers for funding notices and awards.** Executive Order 14332 (August 7, 2025) requires senior-appointee review and approval of new funding opportunity announcements and pre-issuance review of discretionary awards for consistency with agency priorities and the national interest.
- **Uniform Guidance thresholds moved.** Under the 2024 revision of 2 CFR 200, the equipment threshold is the lesser of your capitalization level or $10,000, the de minimis indirect rate is up to 15 percent of modified total direct costs, and the single audit threshold is $1,000,000. The FAR simplified acquisition threshold, which 2 CFR 200 uses, rose to $350,000 on October 1, 2025.
- **NEPA procedure changed.** CEQ's NEPA regulations were removed effective April 11, 2025, and DOE revised its own NEPA procedures at 10 CFR 1021 by interim final rule effective July 3, 2025.
- **DOE conflict-of-interest disclosures now start at application.** 2 CFR 910 Subpart C applies to DOE applicants on or after August 17, 2026.
- **Still pending.** OMB published a proposed rewrite of the Uniform Guidance on May 29, 2026 (91 FR 32198). It was not final as of October 25, 2026. Track it.

The engineering discipline holds through all of it. Read the current notice as the specification, build to it, and prove every claim.

1 Application Engineering as a Discipline

Federal grant application engineering is the discipline of producing a structured document that satisfies a specific evaluation rubric, ties project facts to federal compliance requirements, and supports the agency's decision to fund this project over the others in the stack. It is not writing. It is architecture: evaluation-criteria mappings, evidence anchors, win themes, compliance language built in instead of bolted on, and a coordinated production process. It can be taught, but the teaching has to be specific, because federal energy grants have features you do not meet in other grant work.

1.1 The Six Engineering Elements

A well-engineered federal energy application shows six elements, consistently.

1. It reads the notice the way a structural engineer reads a load specification, mapping every scoring criterion, required document, cross-cutting compliance element and formatting rule.
2. It takes a strategic posture that answers the competitive field, the agency's current priorities, and the project's defensible differentiators.
3. It organizes around win themes that surface throughout the application, not in one section.
4. It engineers each narrative section to answer its scoring criterion explicitly, with evidence anchors the reviewer can check.
5. It builds the budget as an integrated artifact that supports the narrative and survives cost-reasonableness review.
6. It carries federal cross-cutting compliance from the first draft instead of treating it as a late appendix exercise.

In my view, applications that show all six outperform applications that show some of them. An application that shows none can still be complete. It is rarely competitive.

1.2 The Difference Between Writing and Engineering

A skilled writer can produce a coherent description of any project. It may read well and carry real enthusiasm. It may still fail the rubric. The rubric is mechanical: specific questions, specific point values, and a reviewer who scores against them. An application that did not build its narrative around the rubric loses points wherever the rubric did not find its answer.

Engineering makes rubric satisfaction explicit. Each scoring criterion maps to a section. Each section answers its scoring question directly. Each substantive claim has evidence underneath it. The reviewer finds the answers in the structure the rubric set up, and scores favorably because the application made a favorable score easy to justify.

1.3 The Production Process

An engineered application runs on a production process, and that process should start thirty to sixty days before the due date. Agencies are told to keep funding opportunities open for at least 60 calendar days, though they may shorten that, so the clock is often tighter than it looks (2 CFR 200.204(b)). The process has six phases.

1. **Reading and analysis.** Read the notice, identify every required element, build the compliance matrix, and size up the competition.
2. **Strategy.** Select win themes, make the positioning decisions, frame the technical case and the policy case, and confirm the partners.
3. **Build.** Draft section by section, each mapped to its scoring criteria, with evidence anchors collected and checked.
4. **Review.** Run technical, financial, legal and senior leadership reviews.
5. **Finalization.** Integrate feedback, close gaps, verify compliance, and assemble the package.
6. **Submission and tracking.** File early, capture the confirmation, and track the agency's review (Chapter 11).

Put the process on a calendar. Every phase gets named deliverables and named reviewers. Slippage in one phase squeezes every phase after it. When a build phase runs late into review under time pressure, the result is a document full of errors that the agency reviewer catches and the applicant loses on.

1.4 The Engineering Team

The team needs four capabilities: technical, financial, compliance and writing. Technical supplies the project content. Financial builds the budget and the reasonableness support. Compliance makes sure federal cross-cutting requirements are carried into the document. Writing connects the other three into one coherent application. One lead coordinates across them and makes the integration calls.

Smaller applicants may not have all four in house. An application built without one of them has a gap in that dimension. Either bring in outside support to fill it, or accept that the application will be weaker there than the competition. The math is the same either way. Applications weaker than the field do not win.

1.5 The Standing Application Library

Applicants who pursue several federal energy programs build a standing library of reusable content: entity profile, prior award history, capability statements, organizational charts, key personnel resumes, financial statements, sample compliance documentation, and the standard sections that recur from one application to the next. The library cuts production time on every new pursuit and keeps submissions consistent.

Curate it. Do not just archive it. Update reusable sections when facts change, retire stale content, and fold in what worked in funded applications. After 2025, that means pulling every boilerplate paragraph written for Justice40, Community Benefits Plans or other rescinded requirements before it lands in a new submission (see Chapter 8).

1.6 The Application as the Beginning of the Project Record

The application is not a marketing piece that gets archived after submission. It is the first document in the project record. If the project is funded, the application supplies the project narrative and milestone definitions, the baseline for performance reporting, and the reference point for cost reasonableness during construction. People will cite it throughout the period of performance. An application engineered with that use in mind produces a record that is easier to operate. One written only to capture the award produces friction for years.

2 Reading the Notice: What Programs Are Actually Asking For

The solicitation defines the rules of the competition. Under the Uniform Guidance it is a notice of funding opportunity, whatever the agency calls it: a funding opportunity announcement, program announcement, broad agency announcement or solicitation (2 CFR 200.1). DOE solicitations have long been styled FOAs; this reference uses "notice" for all of them. Every successful application starts with a full reading of the notice and ends with a submission that answers every question it asks, in the format it specifies, with the evidence it expects. Applicants who skim it and work from a general sense of the program miss requirements. Applicants who read it with engineering discipline satisfy the rubric.

2.1 The Document Structure

A notice from a major federal energy agency, with its attachments, is a long document. Appendix I to 2 CFR 200 now requires every full notice to use the same or similar section headings, including at least these sections: Basic Information, Eligibility, Program Description, Application Contents and Format, Submission Requirements and Deadlines, Application Review Information, Award Notices, and Post-Award Requirements and Administration. It also lets agencies link to standard content, such as terms and conditions, instead of printing it. Every section can contain binding requirements. Treat all of it as operational, not background.

Many applicants spend most of their reading time on the program background and policy goals, because those sections describe what the program is about. They matter for win themes. They do not hold the operational requirements. Those live in three places: eligibility, application requirements, and evaluation criteria. An applicant who has not read those three closely cannot engineer a compliant application.

2.2 Eligibility Criteria

Eligibility criteria define who can apply, which projects qualify, what cost share is required, and what disqualifies an applicant. Each one is binary. Either you meet it or the application is ineligible, and an ineligible application is rejected without a look at its merit.

Common problems include entity-type restrictions, technology restrictions, geographic limits, prior-award restrictions, cost share floors the applicant cannot meet, and registrations that are not done. Registration is the easiest to miss and the most avoidable. Unless exempt, an applicant must be registered in SAM.gov before submitting an application, must keep that registration current while an application is under consideration, and must include its Unique Entity Identifier in the application (2 CFR 25.200). Verify every potential eligibility issue before serious development begins. Discovering at submission that the entity is ineligible throws away a month of work.

Document the eligibility analysis in writing. The compliance matrix captures each requirement, the evidence the applicant relies on, and any open question that has to be resolved before submission.

2.3 Application Requirements

Application requirements define what you must submit. The usual set includes the project narrative, budget and budget justification, project schedule, management plan, key personnel resumes, organizational documents, letters of support, environmental information, and certifications, plus whatever program-specific plans the notice names. Each document has format rules, page limits and required content.

Read this section against a checklist. Every required document is identified, owned and tracked through production to submission. A missing or non-conforming document draws an administrative rejection in some programs and a scoring penalty in others. Either way, the engineered application catches it before submission.

Page limits deserve special attention. They are binding, and depending on the program, pages over the limit may be removed or simply not read. Teams that do not build within the limit end up compressing at the last minute and cutting substance to do it. Build within the limit from the start.

2.4 Evaluation Criteria and Scoring Rubric

The evaluation criteria define how the application will be scored. Each criterion has a published weight or point value, a description of what reviewers look for, and often sub-criteria with their own weights. The rubric is the application's evaluation specification. Engineering to the rubric is the central act of application engineering.

The compliance matrix captures every criterion and sub-criterion. For each one it records the section that answers it, the content of the answer, the evidence anchors behind that content, and the win theme it connects to. Any section that maps to no criterion gets a second look. Either it fills a required-document function, or it is spending pages that belong to scored content.

2.5 Submission Instructions

Submission instructions define how, when and where the application goes in. Agencies post their funding opportunities on Grants.gov (2 CFR 200.204(a)), and the notice tells you whether to submit there or through an agency or program portal. Each portal has its own technical requirements, file-format restrictions, size limits and timing rules.

Timing is unforgiving. Late applications are rejected. Applications filed in the wrong system are not considered. Applications that fail technical validation are returned or rejected, depending on the program. Submit days ahead whenever you can. Filing at the deadline invites portal problems, connectivity problems and validation errors you will not have time to fix.

2.6 Incorporated Documents

Notices incorporate documents by reference: agency standard terms and conditions, program guidance, the cost principles, environmental review procedures and similar material. They are

binding even though they are not printed in the notice. Download and read each one. The notice assumes you know what is in them, and they often hold operational requirements it never restates. For DOE, that includes the agency's own financial assistance rules at 2 CFR 910, which add to and modify 2 CFR 200.

2.7 Questions, Answers and Amendments

Most federal energy programs take applicant questions during a Q&A period and publish amendments that update or clarify the notice. Track both continuously. A substantive amendment can change the strategy, and a Q&A response can carry interpretive guidance that changes how a section should be built.

The application answers the current version of the notice, including every amendment. Confirm that before submission. An application written against the original version can miss a requirement added later.

3 Application Strategy and Competitive Positioning

Strategy is deciding how the project will be positioned against the field: which differentiators to emphasize, which trade-offs to accept, and which risks to name and answer. Those decisions come early and govern every later decision. Applications without explicit strategy drift. Sections get written in isolation, and integration happens late or not at all.

3.1 The Competitive Field

Every program has a competitive field, shaped by its eligibility rules, the agency's priorities, the dollars available, and how visible the program is to likely applicants. Some programs draw far more applications than they can fund. Others draw a handful of qualified ones. The posture differs accordingly.

In a crowded field, the application has to differentiate on substance. Technical merit has to rise above the field. Benefits have to be real. Cost share has to be credible, the team experienced, and the risks answered with substance. Adequate loses to differentiated.

In a thin field the discipline shifts. Adequacy may be enough if the substantive criteria are met, so the work focuses on answering every criterion and leaving no element weak enough to give the reviewer a reason to say no. In a less competitive field, the engineered application is the one that does not lose to itself.

The strategic analysis estimates the likely field, the likely score distribution, and the threshold the application has to clear. That estimate sets how much effort each section gets.

3.2 Agency Policy Priorities

Agencies fund against their current priorities, and those priorities can shape decisions even where the published criteria do not name them. In 2025 they changed sharply. Executive Order 14154 (Unleashing American Energy) and Executive Order 14148 revoked the climate and equity executive orders behind much of the 2022–2024 program language. Executive Order 14173 revoked Executive Order 12898 on environmental justice. Executive Order 14332 now directs agencies to review new funding announcements and discretionary awards for consistency with agency priorities and the national interest, and says discretionary awards must, where applicable, demonstrably advance the President's policy priorities.

The practical rule: take the agency's priorities from the current notice and the agency's current published statements, not from last cycle's template. A 2024 list of DOE, EPA or USDA priorities is not a safe guide to a 2026 competition.

Applications that line up with the agency's real priorities, beyond checking criteria boxes, position themselves well. Show the alignment through the win-theme framework and back it with project facts that actually advance the priority. Forced alignment is easy to spot and it hurts you. Genuine alignment, well documented, helps.

3.3 Positioning Decisions

The strategy phase produces explicit positioning decisions. What is the project's primary differentiator? Is it competing on cost, innovation, reliability, speed to deployment, regional importance, or several of these? Each choice carries trade-offs. A low-cost position may not also be an innovation position. A community-engagement position takes real engagement, which adds time and complexity. The discipline forces those trade-offs into the open instead of letting them surface halfway through the build.

Senior leadership and the engineering lead make the positioning decisions together and record them in a positioning memo that guides the build. Every section traces back to that memo. Sections that drift from it get revised or cut.

3.4 Risk Acknowledgment Strategy

Reviewers look for technical, financial, regulatory and execution risk. Separately, before making an award, the agency must review the risk the applicant poses, considering factors such as financial stability, the quality of its management systems, its history of performance and audit findings (2 CFR 200.206). An application that skips risk looks naive. One that discusses every conceivable risk looks unfocused. The strategic decision is which risks to treat substantively, how to answer each one, and which to leave out as too remote to matter.

Build the risk discussion into the management plan, the schedule and the relevant narrative sections. Treat it as a credibility signal, not a confession. A well-engineered risk discussion names the risk, sizes the exposure where it can, states the mitigation and names the owner. Done that way, it turns a weakness into evidence of competence.

3.5 Pursuit Decision Discipline

Strategy is where the pursuit decision gets reconfirmed. Look at the program against the project facts, the field, the cost of pursuit, and the organization's capacity to execute if funded. Applicants that chase every program without filtering burn capacity without a proportional return. Applicants that filter hard file fewer applications and put their effort where their competitive position is strongest.

Write the decision down: the strategic basis, the resources committed, the win-probability assessment, and the fallback if the application is not funded. A documented record lets the organization sharpen its pursuit decisions over time.

3.6 Coordination Across Pursuits

Applicants with several pursuits in motion coordinate them. Some funding sources cannot be combined. Others can be stacked. Some notices require disclosure of other pending applications. Cost share is a common trap: the same contribution cannot count as cost share on two federal awards, and funds from another federal award generally cannot count at all unless

the authorizing statute allows it (2 CFR 200.306(b)). The strategy phase maps these interactions and structures each application to fit.

Coordination is also a resource question. An organization with limited application capacity cannot pursue everything at full engineering depth. Decide explicitly which pursuits get full effort, which get a lighter touch, and which wait for a later cycle.

4 The Win-Theme Framework

A win theme is a sentence or short phrase that captures one of the project's primary differentiators in a form you can deploy across the application. It is not a slogan. It is an engineered statement that connects project substance to the agency's criteria and priorities. A well-engineered application usually runs three to five themes, each surfacing in different sections under different framings and reinforcing the same core message. The reviewer absorbs them through repetition without noticing the repetition.

4.1 Constructing a Win Theme

A win theme has three parts: the differentiator the project carries, the criterion or priority it answers, and the evidence that supports it. Build one by identifying a project fact that sets the project apart from the likely field, naming the criterion that fact responds to, and confirming the evidence behind it.

Take a project whose differentiator is a working partnership with its host community, backed by a memorandum of understanding with the local government, a community benefits agreement with named local organizations, and quantified local hiring commitments. The theme is "deeply integrated community partnership." The criterion is whichever scored section the notice uses for community or stakeholder engagement. The evidence is the MOU, the agreement and the hiring commitments. The theme then surfaces in the executive summary, the narrative, the management plan and the letters of support.

Or take a project that is unusually cost-competitive because of a strong supply chain position, favorable site characteristics or pre-negotiated EPC terms. The theme is "cost-competitive deployment with confirmed supply chain." The criterion is technical and economic feasibility. The evidence is the EPC term sheet, supplier commitment letters and comparable project cost data. The theme surfaces in the budget, the schedule, the management plan and the technical narrative.

4.2 Win-Theme Discipline

The common failure is proliferation. The applicant lists ten or fifteen good things about the project and calls each one a theme. The result is diffuse. Nothing concentrates the reviewer's attention. Pick the three to five themes that genuinely set the project apart from the field and repeat them on purpose.

Keep them in one win-theme matrix: each theme, the criterion it answers, the evidence it relies on, and the sections where it will appear. Review every section against the matrix during the build to confirm the right themes are present.

4.3 Surfacing the Themes

A theme appears as substance, not as a slogan. The community partnership theme might show up in the narrative as "site selection followed a six-month engagement with the host community that produced the memorandum of understanding at Appendix C." In the management plan it might read, "the community liaison reports directly to the project lead and meets weekly with the advisory board established under the memorandum of understanding." Same theme, different expression in each section.

4.4 Coordinating With Agency Priorities

Themes connect to the agency's current priorities. A project that genuinely advances them can use the priority language directly. A project that does not should not force it. Reviewers spot performative alignment and discount it, and after the 2025 policy changes, reaching for last cycle's language can actively hurt. Authentic alignment, backed by evidence, is what helps.

4.5 Avoiding Anti-Themes

Anti-themes are the weak spots the application has to answer. Every project has them. Strong technical merit with a thin award history raises the experience question. Strong experience with exposure to a regulatory uncertainty raises the uncertainty. Strong economics with a contested site raises the site question. Name the anti-themes during strategy and engineer a response that turns each one into a managed risk or a non-issue.

The risk section of the management plan is often the right home for these responses. It acknowledges the issue, names the mitigation and the owner, and closes the issue as managed. The reviewer who would have wondered finds the answer where it belongs.

4.6 The Executive Summary as Win-Theme Concentration

The executive summary is where the themes are most concentrated. It is the first thing the reviewer reads and often the only thing read closely before the rest is worked through. A well-engineered summary deploys every theme in its primary form and sets the expectation that the rest of the application will back them up. A summary that reads like a generic project description wastes that opportunity. One that reads as an engineered position statement sets up a favorable reading of everything after it.

5 Project Narrative Engineering: From Description to Defended Claim

The project narrative is the core of most federal energy applications. It carries the technical case, the fit with the program, the implementation plan, and the link between the project's outputs and the agency's outcomes. Reviewers read it more closely than anything else, and it often carries more scoring weight than any other single section. Engineering it around the criteria, the win themes and the evidence base is what turns a project description into a competitive submission.

5.1 Description Versus Defended Claim

The first move is to separate description from defended claim. A description states what the project is. A defended claim states what the project will accomplish and supports it with evidence the reviewer can check. Applications that describe without claiming tend to score lower, because the reviewer cannot connect the description to the program's outcome measures.

A defended claim has three parts: what the project will accomplish, the mechanism that produces the result, and the evidence that makes it credible. A project that says it will deliver a stated amount of new generating capacity, a measured reliability improvement, and a specific number of construction jobs has made claims. The mechanism is the deployment plan and the system analysis. The evidence is the engineering design, the interconnection studies, the modeling and the workforce projections. A narrative built from defended claims gives the agency a project it can fund with confidence. A narrative of undefended descriptions makes the reviewer work harder to score it well.

5.2 Mapping the Narrative to Scoring Criteria

The narrative's structure follows the criteria. If technical merit carries thirty percent of the score, give roughly thirty percent of the pages to substantive technical content aimed at what that criterion asks. If another criterion carries twenty percent, give it roughly twenty percent. The allocation is not mechanical, but it is informed.

Match headings to the criteria's language where you can. A criterion asking about "technical feasibility and project readiness" gets a section framed around technical feasibility and project readiness. A reviewer scanning for the scoring elements finds them in the structure the rubric set up.

5.3 The Technical Case

The technical case is where the engineering lives: the technical approach, engineering basis, equipment selection, site characteristics, interconnection, operating concept and technical risk

profile. Appendices carry the support, including engineering studies, interconnection documents, site assessments and supplier information.

Reviewers test the technical case for completeness, credibility and feasibility. Complete means it covers every material technical dimension. Credible means it rests on evidence beyond the applicant's own word. Feasible means it shows the project can be built as described, by the team described, on the schedule described, within the budget described.

The usual failures are a case too high-level to support feasibility, specifications that are aspirational instead of confirmed, and a case that skips critical site or interconnection issues. Internal review is where you catch them.

5.4 The Implementation Plan

The implementation plan says how the project gets executed if funded: schedule, milestones, responsible parties, resource commitments, the regulatory and permitting path, construction approach, commissioning and startup, and the handoff to operations. A project schedule showing the milestone sequence and the critical path backs it up.

Reviewers test the plan for realism, completeness and risk management. Compressed timelines, missing regulatory steps and vague responsibilities score poorly. Plans that show real prior planning, identify critical-path constraints and assign clear responsibility score well.

5.5 The Outcomes Case

The outcomes case ties the project to what the program is paying to achieve and shows the project will contribute materially to it. Read the outcomes from the current notice. They may be capacity added, reliability or resilience gains, cost reductions for ratepayers, domestic supply chain growth, workforce development, or something else the program names.

Quantify where you can. A claimed reliability benefit comes with its method, baseline and quantified result. A jobs claim comes with the number of positions, wage levels, duration and how the count was built. Quantified outcomes give reviewers something concrete to evaluate and give the agency numbers it can report. Executive Order 14332 also says discretionary awards should include clear benchmarks for measuring success and progress toward relevant goals (sec. 4(b)(vi)). Outcomes built as measurable benchmarks fit that review.

5.6 Evidence Anchors

Every substantive claim is anchored to evidence: an appendix document, a footnoted source, a named study, a specific data point. An unanchored assertion reads as less credible than the same fact anchored to a source the reviewer can check.

Build an evidence-anchor inventory during strategy. Map every claim the application will make to the evidence behind it. Where the evidence is not collected yet, list what needs collecting before finalization. Where it does not exist and cannot be produced, soften the claim or cut it.

5.7 Writing for Reviewer Mechanics

Reviewers work under time pressure, often scoring many applications in a short window, looking for specific things on their scoring sheets. Write for that. Use descriptive headings. Put the

substance in the topic sentence. Use lists where structure helps and tables where comparison matters. Leave white space so the page can be scanned.

Dense, unbroken prose is harder to score well than a narrative built to be scanned. The engineered narrative respects how the reviewer actually works.

6 Budget Construction and Cost-Reasonableness Documentation

The budget is one of the most scrutinized sections of any federal energy application. A budget that survives cost-reasonableness review supports the project's credibility. One that fails it undermines the whole application, however strong the technical case. Engineered properly, the budget integrates with the narrative, holds up under reasonableness review, and becomes the basis for post-award financial administration.

6.1 The Cost Categories

Federal budgets use standard categories: personnel, fringe benefits, travel, equipment, supplies, contractual, construction, other direct costs and indirect costs. Each has its own reporting expectations and cost-principle considerations. Map every projected cost to the right category and document the basis for each.

- **Personnel.** Positions, time commitments and salary basis.
- **Fringe benefits.** Calculated against the applicable fringe rate.
- **Travel.** The project's real expected travel, priced under GSA rates or the applicant's travel policy.
- **Equipment.** Each item at or above the equipment threshold, with quotes or specifications.
- **Supplies.** Lower-cost items, aggregated.
- **Contractual.** Each major contract with vendor, scope and pricing basis.
- **Construction.** Usually organized by major work package, with the engineering basis behind each.
- **Other direct costs.** Items that fit no other category.
- **Indirect costs.** The negotiated rate or the de minimis rate, as applicable.

One DOE-specific point: for-profit recipients and subrecipients of DOE awards follow the FAR cost principles at 48 CFR 31.2 in place of the 2 CFR 200 cost principles (2 CFR 910.352). Build a for-profit budget to that standard.

6.2 Cost Reasonableness

Reasonableness is tested against 2 CFR 200.404: a cost is reasonable if it does not exceed what a prudent person would incur under the circumstances prevailing when the decision to incur it was made. The regulation directs attention to whether the cost is ordinary and necessary for the project, the constraints of sound business practice and arm's-length bargaining, market prices for comparable costs in the area, whether the people involved acted prudently, and whether the cost departs from the applicant's own written policies. Reviewers apply that test by comparing your numbers to industry benchmarks, comparable projects, quotes or bids, and your own cost history.

The budget justification is where you support it. Explain the basis, the method and the evidence for each line. Lines from quotes cite the quotes. Lines from benchmarks name the benchmark and its source. Lines from prior projects name the comparables and their cost basis. Lines from engineering estimates name the estimator and the method.

6.3 Cost Share

Many federal energy programs require cost share. For DOE research and development activities, the statutory floor is generally 20 percent non-federal, and for demonstration and commercial application activities, generally 50 percent, with authority to reduce or eliminate it in defined cases (42 U.S.C. 16352). DOE's added cost-share rules sit at 2 CFR 910.130. Other programs set their own levels. Take the number from the notice.

Document the commitment in the budget and in commitment letters from each contributor. Cost share may be cash, the applicant's in-kind contributions, or third-party in-kind contributions. The agency must accept it when it is verifiable in your records, not counted toward another federal award, necessary and reasonable, allowable, not paid by another federal award unless the statute allows, in the approved budget where required, and otherwise compliant (2 CFR 200.306(b)).

Valuation follows 200.306. Third-party volunteer services are valued at rates consistent with what the recipient pays for similar work, or the local labor market rate where the skill is not in the recipient's workforce. An employee loaned by a third-party organization is valued at that employee's regular rate of pay plus allowable fringe and indirect costs. Donated property from third parties may not exceed fair market value at the time of donation. Donated buildings and land follow their own rules. Put the valuation method in the budget justification. Cost share the agency finds poorly documented can be reduced, and a reduction can drop the application below the program's floor.

6.4 Equipment Justification

Under the 2024 revision of 2 CFR 200, equipment is tangible personal property with a useful life over one year and a per-unit cost at or above the lesser of your capitalization level or $10,000 (2 CFR 200.1). Equipment gets heightened budget review. For each item, give the unit cost, quantity, supplier basis, installation location and the federal share funding it. Explain why the project needs it, why this item was chosen, and how you determined the cost was reasonable.

Separately, every procurement transaction above the simplified acquisition threshold, including contract modifications, requires a cost or price analysis, starting with an independent estimate made before bids or proposals are received (2 CFR 200.324(a)). The 2 CFR 200 threshold is the one set in the FAR, which has been $350,000 since October 1, 2025 (48 CFR 2.101). Your own procurement policy may set a lower one. If the application anticipates purchases above it, describe the price analysis method in the budget justification. The analysis itself happens at procurement.

6.5 Contractual Costs

Contractual costs are often the biggest line in an energy budget, especially EPC, equipment supply and consulting contracts. Identify each major contract, the contractor or anticipated contractor, the scope, the estimate and its basis.

Where you hold letters of intent, term sheets or preliminary agreements, reference them and consider appending them. Where you do not, say how the contracts will be procured under the federal procurement standards if the project is funded. The procurement method shapes the cost basis, and a basis built on competitive bids carries more weight than one built on market estimates.

6.6 Indirect Costs

Indirect costs are recovered at the applicable rate. An applicant with a federally negotiated indirect cost rate agreement uses that rate. An applicant without one may elect a de minimis rate of up to 15 percent of modified total direct costs. It needs no documentation to justify it, can be used indefinitely, and once elected applies to all of the applicant's federal awards until a negotiated rate is in place (2 CFR 200.414(f)). Modified total direct costs exclude equipment, capital expenditures, rental costs and the portion of each subaward over $50,000, among other items (2 CFR 200.1). Many older templates still show the pre-2024 10 percent rate. Fix them.

State the rate used, the base, and the supporting agreement or de minimis election. Indirect costs above the applicable rate or computed on the wrong base draw questions and can be cut in pre-award review. Note also that Executive Order 14332 tells agencies that, all else being equal, discretionary awards should favor institutions with lower indirect cost rates. That is not a reason to understate real costs. It is a reason to know your rate and be ready to defend it.

6.7 Budget and Narrative Integration

The budget and the narrative tell the same story. Personnel in the budget match key personnel in the narrative. Equipment matches the technical approach. Contractual scopes match the implementation plan. Cost share matches the commitments the narrative cites.

Inconsistencies draw reviewer questions and can become pre-award findings. Check the budget against the narrative in every internal review cycle.

6.8 Budget Periods and Period of Performance

Federal energy awards often run several budget periods within one period of performance. The budget follows the expected cost flow and places each cost in the budget period where it will be incurred. Identify the prior-approval requirements in 2 CFR 200.308 and the award terms that will apply to budget changes, and plan for any rebudgeting you can already foresee.

7 Federal Cross-Cutting Compliance in the Application Itself

Cross-cutting requirements apply to most federal energy awards regardless of which program funds them: environmental review under NEPA, historic preservation review under Section 106, civil rights compliance, Davis-Bacon prevailing wages where the program carries them, Buy America preferences for infrastructure, lobbying restrictions, conflict-of-interest disclosure, and the procurement and subaward standards. Applications that treat these as appendix afterthoughts often lose to applications that work them into the substantive sections.

7.1 Why Integration Matters

The agency evaluates cross-cutting compliance before award to confirm the project will meet the requirements and the applicant can carry them out. An application that integrates them shows the requirements are understood and the project was planned around them. An application that bolts them on at the end shows they were an afterthought.

Integration is also a quality signal reviewers notice. An applicant that addresses Section 106 by naming the consulting parties and describing the engagement plan looks very different from one that says in a single sentence that Section 106 "will be addressed."

7.2 NEPA Considerations

The National Environmental Policy Act requires federal agencies to consider the environmental effects of their actions, including financial assistance. Depending on the project and the agency's procedures, review ends in a categorical exclusion, an environmental assessment, or an environmental impact statement.

The procedural ground moved in 2025. CEQ removed its NEPA implementing regulations effective April 11, 2025 (90 FR 10610), and DOE revised its own NEPA procedures at 10 CFR 1021 by interim final rule effective July 3, 2025 (90 FR 29676). Work from the awarding agency's current procedures, not from CEQ regulations cited in an old template.

Address NEPA by identifying the likely level of review, the agency procedures that govern it, the information the agency will need, the schedule impact, and your role in supporting the review. Projects on previously disturbed or industrial sites are more likely candidates for a categorical exclusion. Greenfield sites, sensitive areas and projects with significant effects may need an environmental assessment or impact statement.

Put a realistic NEPA timeline in the schedule. A schedule that ignores NEPA looks unrealistic to a reviewer who knows how long review takes, and it slips after award.

7.3 Section 106 Historic Preservation

Section 106 of the National Historic Preservation Act requires an agency, before approving the expenditure of federal funds on an undertaking, to take into account its effect on historic properties and give the Advisory Council on Historic Preservation a reasonable opportunity to comment (54 U.S.C. 306108). The process under 36 CFR Part 800 identifies historic properties in the area of potential effects, assesses effects, and consults with the State Historic Preservation Officer, Tribal Historic Preservation Officers and Indian tribes where applicable, and other consulting parties.

Address it by identifying the area of potential effects, the known historic properties, the consultation plan and the information the agency will need. A project with no historic property interactions may clear Section 106 quickly. A project with potential effects has to show that consultation has started or is planned in detail.

7.4 Civil Rights Compliance

Title VI of the Civil Rights Act of 1964 and related statutes apply to federally assisted programs, and the applicant certifies its compliance in the application. DOE implements these statutes for its assistance programs at 10 CFR Part 1040. DOE published direct final rules in May 2025 rescinding parts of it (90 FR 20777; 90 FR 20783). Their effective date has been delayed several times, most recently to December 28, 2026 (91 FR 39850; 91 FR 39851). Check the current text before you cite it.

One change to watch: Executive Order 14224 (March 1, 2025) revoked Executive Order 13166, the order that drove limited-English-proficiency language access plans. Do not copy an old language access section forward by default. Address civil rights by referencing your nondiscrimination policies, training and any requirements the current notice and award terms actually impose.

7.5 Davis-Bacon Applicability

Davis-Bacon prevailing wage requirements apply to construction on federally assisted projects where the program's authorizing statute or the award carries them. Many energy programs do. The contract clauses at 29 CFR 5.5 require, among other things, weekly certified payrolls. Address Davis-Bacon by stating the applicability determination, how wage determinations will be obtained, the certified payroll workflow and how contractors will be managed.

A project subject to Davis-Bacon should not meet the requirement for the first time at award acceptance. Addressing it in the application shows you understand it and have planned to run it.

7.6 Build America, Buy America

The Build America, Buy America Act, enacted in the Infrastructure Investment and Jobs Act (Pub. L. 117-58), bars obligating federal financial assistance for an infrastructure project unless the iron, steel, manufactured products and construction materials incorporated into it are produced in the United States, subject to waivers (2 CFR 184.1). OMB's implementing guidance is 2 CFR Part 184. Waivers are available on public-interest, nonavailability or unreasonable-cost

grounds, the last where domestic content would raise the overall project cost by more than 25 percent (2 CFR 184.7).

Address it by stating the applicability determination, the compliance approach, the supplier engagement strategy and any waivers you expect to request. A project that has worked Buy America down to the supply chain shows operational maturity. Generic compliance claims without supply chain detail invite skepticism.

7.7 Lobbying Certification and Disclosure

The Byrd Anti-Lobbying Amendment bars recipients from using appropriated funds to pay anyone to influence a federal agency or Congress in connection with a federal grant or cooperative agreement (31 U.S.C. 1352). At DOE, an applicant for a grant or cooperative agreement over $100,000 files the lobbying certification, and a disclosure form where required, with the application (10 CFR 601.110). Lobbying costs are also unallowable under the cost principles (2 CFR 200.450). Build the certification and any disclosure into the package from the start.

7.8 DOE Conflict-of-Interest Disclosures

DOE's conflict-of-interest rule at 2 CFR 910 Subpart C applies to applicants for and recipients of DOE financial assistance on or after August 17, 2026, with an exception for Office of Indian Energy awards. It requires written conflict-of-interest and conflict-of-commitment policies, requires covered individuals to make their disclosures no later than the time the application is submitted, and requires an applicant to disclose organizational conflicts in the application. For a DOE pursuit, this is now application work, not post-award paperwork. Read the subpart and put the disclosures on the production calendar.

7.9 Procurement and Subaward Considerations

Applications often identify planned procurements and subawards. Describe how you will apply the procurement standards (2 CFR 200.317 through 200.327) and how subawards will be determined and administered (2 CFR 200.331 through 200.333). States and Indian Tribes follow their own procurement policies plus several specified sections; everyone else follows 200.318 through 200.327.

7.10 What Came Out of the Cross-Cutting List

Earlier editions of this reference listed Justice40 and environmental justice as cross-cutting requirements. They are not current federal requirements (see Section 8.1). Executive Order 14173 revoked Executive Order 12898 on environmental justice. If a current notice or award term still asks for something in this area, answer what it asks. Otherwise, take the language out.

> **Practice Point**
>
> A 2023 compliance section dates a 2026 application. It still says Justice40, cites the CEQ regulations, and promises a language access plan under a revoked order. Rebuild the cross-cutting section from the current notice every cycle.

8 Community, Workforce and Benefit Commitments

The earlier edition of this reference carried two chapters here: one on engineering DOE Community Benefits Plans and one on Justice40 narratives. Both premises are superseded.

8.1 What Changed

DOE's Community Benefits Plan requirement came from DOE guidance, Policy Flash 2024-16 and Financial Assistance Letter 2024-02. DOE Policy Flash 2025-16, dated January 23, 2025, rescinded that guidance along with DOE's Justice40 coding guidance and its diversity-related acquisition guidance, effective immediately, and directed that the associated terms and conditions no longer be used. Justice40 itself rested on Executive Order 14008, which Executive Order 14148 revoked on January 20, 2025. Executive Order 14332 now also directs that discretionary awards not fund racial preferences, including activities where race or intentional proxies for race will be used as a selection criterion for employment or program participation.

The four-pillar Community Benefits Plan structure, the forty percent Justice40 benefit calculation, and screening-tool mapping of disadvantaged communities should not appear in a new federal energy application unless the current notice explicitly asks for them.

8.2 What Still Applies

Much of the old engineering still holds, because it was never about the label. Many notices still score stakeholder engagement, local and workforce impact, or project readiness, and statutes behind some programs carry their own requirements. When the current notice asks for community, workforce or benefit commitments, the discipline below applies. When it does not, do not volunteer a legacy plan to fill pages.

8.3 Substantive Commitments

A substantive commitment says what will be done, by whom, by when, and how it will be measured. An aspirational statement describes what the applicant hopes for without committing to a mechanism or a metric.

A substantive workforce commitment might say the project will employ a stated number of registered apprentices through a named registered apprenticeship program over a stated period, with quarterly progress reports. The aspirational version says the project intends to promote apprenticeship. The first has weight. The second does not.

8.4 Partnership Documentation

Commitments carry more weight when they are backed by documented partnerships with named local governments, workforce organizations, educational institutions or community organizations, through memoranda of understanding, community benefits agreements or letters of support appended to the application. A partnership that exists only in the narrative carries less weight than one backed by a signed document. Secure the documents before finalization. Chapter 9 covers how.

8.5 Quantifying Benefits and Documenting the Method

Where the notice asks for benefits, quantify them and show the work. Benefits may include local economic activity, tax revenue, local hires, training provided, infrastructure investment, reliability improvements and direct payments to local organizations. Document the data sources, calculation steps, assumptions and limits so the reviewer can check the figures. Distinguish benefits that arrive during construction, during operations and over the project's life.

Be honest about limits. Describe hard-to-quantify benefits qualitatively, acknowledge assumptions, and name uncertainties. Overselling a benefits analysis costs you later when the agency or the community finds the overstatement.

8.6 Engagement Mechanisms

Describe the engagement mechanisms that will operate during the period of performance: advisory boards, public meetings, a liaison position, a grievance procedure. For each, say who participates, how often it meets, what authority it has and how outcomes are tracked. Mechanisms with no authority and no timeline are less credible than mechanisms with named participants and committed dates.

8.7 Tribal Consultation

Projects that may affect historic properties of significance to Indian tribes trigger consultation obligations in their own right. Under Section 106 the agency must consult any Indian tribe that attaches religious and cultural significance to historic properties that may be affected, regardless of where the property sits, and consultation should begin early in planning (36 CFR 800.2(c)(2)(ii)). Identify the tribes likely to be consulted, the status of any outreach, and the plan going forward. Projects that have not done this work risk delay during NEPA and Section 106 review.

8.8 Reporting Commitments

Say how commitment delivery will be reported: progress against each commitment, benefits delivered, and feedback received. Name the metrics, the cadence and the audience. Reporting commitments without metrics produce weak accountability. Specific ones produce strong accountability and add to the application's credibility. They also become award obligations, so commit only to what the project will actually deliver and track.

9 Letters of Support and Partner Coordination

Letters of support and partner documents contribute to most federal energy applications. They show the project's relationships with stakeholders, the partners' readiness to execute, and the commitments behind the application. Generic letters with no specific commitment carry little weight. Letters that name specific commitments, identify the signing authority and align with the application's content carry real weight.

9.1 Who Writes Letters of Support

Identify the partners during strategy. They typically include host community officials, community organizations, workforce partners, educational institutions, technology suppliers, EPC contractors, financial partners, regulators and elected officials.

A partner who signs takes a public position supporting the application. That position has weight precisely because it is public. Treat a partner's willingness to sign as a commitment to participate if the project is funded.

9.2 Substantive Letter Content

A well-built letter identifies the partner and the signer's authority, describes the partner's role in the project, states the specific commitments the partner is making where there are any, shows the partner's capacity to deliver, and lines up with the application's win themes. "We support this project" with nothing behind it carries little weight. Draft letter language with the partners or give them templates to complete with their own specifics.

9.3 Drafting Letters With Partners

Standard practice in competitive applications is for the applicant to draft the initial text and send it to the partner to review, customize and sign. The partner adjusts the language to reflect its actual position and authority and returns the signed letter for the package.

That approach is common and acceptable. Partners usually appreciate it because it saves them work, and it keeps the letter aligned with the themes and criteria. The discipline is to avoid overdrafting: no putting words in the partner's mouth, and no overstating what the partner has committed to.

9.4 Signature Authority

A letter's weight tracks the relevance and stature of the signer. A letter from a council member reads differently from one signed by the mayor. A letter from an organization's executive director reads differently from one signed by its board chair. Match the content to the right signer.

Decide who in each partner organization should sign, considering its structure, the content of the letter, and how it usually handles similar commitments. Letters signed by the right authority help. Letters signed by someone too junior, or with no relevant role, undercut the partnership.

9.5 Coordinating Multiple Letters

A major federal energy application can carry dozens of letters. Drafting, securing and assembling them is real work. Set up a letter workstream early, with a named owner for each letter, target signing dates and progress tracking.

Coordination failures produce letters that arrive after the deadline, letters that contradict the narrative, and letters that never arrive from key partners. Each one weakens the application. Catch them early.

9.6 Partner Capability Statements

Some applications include partner capability statements alongside or instead of letters, describing the partner's qualifications, experience and capacity to perform its role. For EPC contractors or equipment suppliers these can be substantial, with project history, financial information and key personnel resumes. For community partners they are usually shorter and focused on mission, program capacity and prior collaboration.

9.7 Memoranda of Understanding and Community Benefits Agreements

Some partnerships rise to formal agreements appended to the application. An MOU describes the relationship in more substantive terms than a letter. A community benefits agreement with local organizations may include enforceable commitments on hiring, payments, environmental matters or other issues.

Formal agreements show a higher level of commitment and usually earn more credit in scoring. They also create obligations you will have to honor during the period of performance. Review each proposed agreement for both its application value and its post-award consequences.

9.8 Letters From Elected Officials

Letters from members of Congress and other elected officials are common in major federal energy applications. Whether the agency treats them as scoring inputs depends on the notice. Manage those relationships within each office's established norms.

The lobbying rules turn on how you pay, not on whether an official writes. The Byrd Amendment bars using appropriated funds to pay anyone to influence an agency or Congress in connection with the award, and requires disclosure of lobbying paid with other funds where it applies (31 U.S.C. 1352). Keep award funds away from any effort to obtain such letters, make sure any paid lobbying activity is disclosed as required, and have counsel confirm the approach.

10 Internal Review Cycles: Technical, Financial, Legal

Structured internal review before submission surfaces the gaps, errors and inconsistencies the production team missed. In my view, applications that go through several review cycles with the right reviewers do better than applications that were not reviewed in substance. Put the cycles on the calendar, name the reviewers, and integrate the feedback systematically.

10.1 The Three Review Types

Effective applications pass through three distinct reviews. Technical review confirms the technical content is accurate, complete and defensible. Financial review confirms the budget is reasonable, consistent and supportable. Legal review confirms the representations are accurate, the certifications are appropriate and the partnership documents are sound.

Each needs reviewers with the right expertise: senior engineers, experienced project managers or outside technical advisors for the technical review; controllers, CFOs or financial consultants for the financial review; in-house or outside counsel for the legal review. Reviewers work independently of the production team so they bring fresh eyes.

10.2 Technical Review

The technical reviewer reads the application as the agency reviewer will, looking for technical errors, gaps in the case, claims that outrun the evidence, and inconsistencies between the narrative and the supporting documents. The reviewer may ask for more support for thin claims and may flag technical risks the application has not addressed.

The technical reviewer also tests feasibility. Does the case show the project can be built as described? Does the implementation plan follow a realistic engineering and construction sequence? Does the team have the capabilities claimed? This review turns the production team's work into a document that holds up under scrutiny.

10.3 Financial Review

The financial reviewer tests the budget, the reasonableness documentation, the cost share commitments and the financial certifications for internal consistency, alignment with the narrative, and reasonableness against benchmarks, and checks the cost share for adequacy and documentation.

The financial reviewer also looks at the applicant's overall financial posture, because the agency will. The agency's pre-award risk review (Section 3.4) looks at the same things. Are the financial statements current and clean? Are there open single audit findings? A non-federal entity that spends $1,000,000 or more in federal awards in a fiscal year needs a single or program-specific

audit (2 CFR 200.501), and DOE applies a $1,000,000 threshold to for-profit recipients through a class deviation to 2 CFR 910.501 (DOE Policy Flash 2025-02). Surface these issues before submission, while there is still time to fix or explain them.

10.4 Legal Review

Legal review examines the certifications, the partnership documents, the representations in the application and compliance with program requirements. The reviewer confirms the certifications are appropriate, the partnership documents are properly executed, and nothing in the application creates downstream legal exposure.

It matters most for applications carrying community benefits agreements, MOUs or other formal documents. The legal reviewer makes sure they are enforceable, that the obligations are appropriate, and that they create no unintended commitments. Legal review also checks the lobbying certification and disclosures, the DOE conflict-of-interest disclosures under 2 CFR 910 Subpart C for a DOE pursuit, and any other certifications the notice requires.

10.5 Senior Leadership Review

After the three substantive reviews, senior leadership takes a final pass. The senior leader reads the application as the agency will, judges the overall positioning, and confirms it reflects the posture the organization wants to take. This review catches strategic problems the substantive reviews can miss.

It is also where institutional sign-off happens. The application is a representation by the organization to the federal government. Senior leadership confirms the organization stands behind every claim, commitment and certification in it.

10.6 Review Calendar

Calendar the review cycles. Technical review starts once a complete first draft exists, with enough time for real feedback and integration. Financial review can run alongside it or follow once the technical content settles. Legal review usually follows the substantive reviews. Senior leadership review comes last, before submission.

Each review gets a defined window. Teams under time pressure that compress the reviews ship documents that never got the scrutiny they needed. Teams that build the reviews into the calendar from the start ship stronger applications.

10.7 Documenting and Integrating Feedback

Log the feedback from each review and track how it is integrated. A log keeps comments from getting lost, and documented integration shows each comment was dealt with instead of quietly ignored.

Some feedback will not be taken, because the team disagrees or the change does not fit the page limit or the schedule. Record those decisions and the reasons. That keeps the review process accountable.

10.8 External Review

Some applicants add external reviewers: former federal program officers, retired agency staff, or peers with experience in the program. They bring a view internal reviewers may lack, especially on what the actual evaluators will look for.

External review carries risk. The reviewer's knowledge of the program may be dated, particularly after the 2025 changes, and the reviewer may have conflicts. Manage it carefully, and get useful feedback without exposing confidential information to the wrong people.

11 Submission Management and Post-Submission Tracking

Submission is the last phase of the engineering process, and it is where avoidable failures cluster. Portals have technical quirks, file-format rules and timing constraints that trip up applicants meeting them for the first time on deadline day. Plan the submission with the same care as the content.

11.1 Portal Familiarity

Learn the portal the notice names (Section 2.5) well before the deadline. Each portal has its own account setup, authentication, application workflow, upload procedure and confirmation mechanics.

New to a portal? Create the accounts and run test uploads early. Already familiar? Confirm the accounts are current, the role delegations are correct and any required training is done. Confirm the SAM.gov registration is active and the UEI in the application matches it (2 CFR 25.200). Confirm portal access days before submission, not hours.

11.2 File Format Compliance

Portals impose file-format rules. Narratives are usually PDF. Budgets often require a spreadsheet or a specific agency template. Letters may need to be separate files or one consolidated file. Some portals enforce page limits through validation; others leave it to the reviewers.

Confirm the formats during strategy and produce every document in the required format from the start of the build. Last-minute conversions invite formatting errors, corrupted files and validation failures.

11.3 Document Inventory

A submission package often runs to dozens of separate documents. The inventory captures every required document, the file-naming convention, the responsible person and the integration status. Before submission, check the inventory against the notice's application requirements to confirm the package is complete.

A missing document can mean administrative rejection or a scoring penalty, depending on the program. The inventory check catches it first.

11.4 Pre-Submission Validation

Many portals offer validation that checks the package for completeness and format. It does not test content, but it catches missing documents, wrong formats and some content issues. Run it well before the deadline and fix what it finds.

Portals and programs differ on whether, and how, a submitted application can be corrected or replaced before the deadline. Find out which rule applies before you submit. If yours does not allow a replacement, validation is your last chance to catch a problem.

11.5 Submission Timing

Submit well ahead of the deadline whenever you can. A margin of days, or at minimum hours, leaves time to work through portal, connectivity or technical problems. For an application engineered to compete, filing at the deadline is an unacceptable risk.

Some teams prefer to submit only a few hours early so they can keep improving the content. Plan a margin that protects the submission while leaving room for final improvements.

11.6 Submission Confirmation

When the portal accepts the application it generates a confirmation, typically with a tracking number, a timestamp and the documents received. Capture it, file it with the application records, and confirm the portal status shows the submission.

Deal with confirmation problems immediately. If the portal shows the application as submitted but no confirmation arrived, contact portal support to confirm receipt. If the portal shows it as not submitted, fix that before the deadline.

11.7 Post-Submission Tracking

After submission the application moves through the agency's process. Timelines vary, but the process typically includes screening for completeness and eligibility, merit review, agency review and selection. Under Executive Order 14332, it also includes pre-issuance review of discretionary awards by a senior appointee or designee for consistency with law, agency priorities and the national interest. Build that into your expectations for timing. Track status through the portal and any direct agency communication.

Some agencies show pre-award progress in the portal. Others give little visibility until a decision is made. Respect the agency's process and do not push for status it is not offering.

11.8 Responding to Pre-Award Inquiries

The agency may send pre-award inquiries asking for clarification, more documentation or a revised budget, usually with a firm response deadline. Treat them as a continuation of the application and answer with the same discipline.

An unanswered or thin response can sink an application that was otherwise competitive. Staff the response properly and review it before it goes back.

11.9 Lessons Captured for Future Pursuits

Funded or not, capture the lessons: what worked, what did not, where the team hit friction, and what the agency said, formally or informally. Feed them into the standing application library.

Applicants who pursue federal energy funding regularly build institutional learning that raises their win rate over time. Applicants who treat each pursuit as a one-off tend to repeat the same mistakes. Capturing and applying lessons is what turns the application function from a periodic scramble into a strategic capability.

11.10 Closing the Engineering Loop

In my view, the discipline across these eleven chapters produces more competitive applications. It can be built, it can be taught, and an organization can own it. What it takes is a decision to treat federal energy grant pursuit as a discipline instead of a periodic effort.

Glossary of Terms

Term	Meaning in this paper
Anti-theme	A weakness or open question in the project that the application must answer directly, usually in the risk discussion.
Build America, Buy America (BABA)	The Buy America preference enacted in the Infrastructure Investment and Jobs Act for federal financial assistance for infrastructure projects, implemented through 2 CFR Part 184.
Categorical exclusion	A category of actions that an agency's NEPA procedures identify as not normally requiring an environmental assessment or environmental impact statement.
Compliance matrix	The working table that maps every eligibility requirement, required document and scoring criterion in the notice to the section, evidence and owner that answer it.
Cost share	The portion of project costs not paid by federal funds, including required matching (2 CFR 200.1, 200.306).
De minimis rate	The indirect cost rate of up to 15 percent of modified total direct costs available to recipients and subrecipients without a current negotiated rate (2 CFR 200.414(f)).
Defended claim	A statement of what the project will accomplish, with the mechanism that produces the result and the evidence a reviewer can check.
Equipment	Tangible personal property with a useful life of more than one year and a per-unit acquisition cost at or above the lesser of the entity's capitalization level or $10,000 (2 CFR 200.1).
Evidence anchor	A reference that ties a claim in the application to verifiable support: an appendix, a cited source, a named study or a specific data point.
Modified total direct costs (MTDC)	The base for the de minimis rate and many negotiated rates; it excludes equipment, capital expenditures, rental costs and the portion of each subaward over $50,000, among other items (2 CFR 200.1).
Notice of funding opportunity (NOFO)	The formal announcement of available federal financial assistance, whatever the agency calls it, including a funding opportunity announcement (FOA) (2 CFR 200.1).
Reasonable cost	A cost that does not exceed what a prudent person would incur under the circumstances prevailing when the decision to incur it was made (2 CFR 200.404).

Term	Meaning in this paper
Section 106	The National Historic Preservation Act requirement that federal agencies take into account the effects of their undertakings on historic properties (54 U.S.C. 306108; 36 CFR Part 800).
Simplified acquisition threshold	The procurement threshold set in the FAR and used by 2 CFR 200, $350,000 since October 1, 2025; procurements above it require a cost or price analysis (48 CFR 2.101; 2 CFR 200.324).
System for Award Management (SAM.gov) and UEI	The federal registration system in which most applicants must be registered before applying, and the Unique Entity Identifier each application must include (2 CFR 25.200).
Win theme	A short, evidence-backed statement of one of the project's primary differentiators, deployed throughout the application.

How Energy Compliance Can Help

The discipline in this reference can be built in house. Energy Compliance, Inc. also applies it with senior practitioners who carry the workload with you, and our scope mirrors this reference.

Federal Energy Funding and Grant Application Support. A defined service line for active pursuits: application strategy, narrative engineering, federal cross-cutting compliance design, budget construction and submission management, following Chapters 1 through 11.

Grant Readiness and Application Engineering. Pre-application diagnostics before you commit to a pursuit: eligibility, registration, cost share capacity, and a read of the current notice for what it actually requires today.

Post-Award Administration. If the application wins, the obligations start on award day. We build the compliance obligation matrix, set the reporting cadence, stand up subrecipient monitoring and prepare for single audit under 2 CFR 200. That includes SEFA preparation, procurement policy and subaward drafting, and grant-file reviews.

Audit Defense. Single audit preparation, Office of Inspector General response, finding remediation, and drafting and executing corrective action plans.

IRA Bonus Credit Documentation. For projects pairing federal funding with clean energy tax credits: documentation discipline for prevailing wage, apprenticeship, domestic content, energy community, direct pay and transferability.

WattOps Compliance. A funded generation, transmission or storage project that becomes a NERC-registered asset brings NERC obligations along with the grant obligations. WattOps Compliance, EC's NERC compliance evidence platform at wattopscompliance.com, keeps that evidence organized from day one. We will run one standard at one of your facilities through WattOps at no cost. CIP standards are excluded from that offer.

RenewOps. The outcomes and benchmarks you promise in the application become the reporting you owe after award. For renewable and storage projects, RenewOps, EC's renewable operations monitoring and analytics platform, which includes a Data Center module, holds the operating data those reports are built from.

If this reference surfaced gaps you cannot close in time for an active pursuit, send me the notice and where you stand. We will talk it through as a working conversation, not a sales pitch.

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The views expressed in this publication are his own and do not represent the views of any federal or state agency, NERC, or any Regional Entity.

About Energy Compliance, Inc.

Energy Compliance, Inc. is a senior-led professional services firm serving registered entities and federally funded energy projects. The firm advises on NERC Reliability Standards, RTO and ISO market frameworks, Public Utility Commission of Texas matters, post-award compliance administration under 2 CFR 200, Inflation Reduction Act bonus credit documentation, federal grant application engineering, and engineering firm partnership structures for owner-side compliance delivery.

Our position is compliance-first. We engineer the documentation, audit trail and obligation matrix that have to survive post-award scrutiny, because in our view, that is where funded energy projects get into trouble, not at the award decision.

Every engagement is overseen by a senior practitioner. We do not bring five people to a meeting that needs one. The firm exists because, in our view, too much of the consulting offered in this space is structured for billable hours, not outcomes. EC also builds the tools: WattOps Compliance, our NERC compliance evidence platform, and RenewOps, our renewable operations monitoring and analytics platform.

The Grant Funding Series is one of several reference series the firm publishes, written for the people doing the work. The substance in the reference is the substance in the engagement. The difference is whether we carry the workload with you or you carry it yourself. The firm is based in Bloomington, Minnesota, and serves clients nationwide.

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