

Comments Received on the CDFA Dairy Digester Research and Development Program (DDRDP)

Comment Period: December 10, 2019 - December 24, 2019

Updated on 02/03/2020

Comment	Response
Program has a lack of procedures, protocols and transparency that are standard to other GGRF administering agencies.	CDFA is working to provide regular updates of existing funded projects and their completion status of these projects on the respective programmatic websites.
Additional funding is being given to a single developer that has received more than \$100 million cumulatively and yet only 3 projects have been completed since 2015.	CDFA supports new developers and will be conducting new developer workshops prior to the next solicitation release. CDFA has conducted new developer workshops in the past to assist and potentially increase the number of developers participating in the DDRDP.
Result of delays in commissioning projects has caused GHG reductions claimed to not be realized.	All projects have met current funding requirements and contractual obligations. There may be numerous issues that arise including weather or wildfire impacts and CDFA provides the flexibility to the dairy producers, the Department's primary stakeholders who offer up their dairy operations and land for projects, that their projects will be completed in compliance with the grant agreement terms.
2020 DDRDP funds should be given to 2019 DDRDP applicants that were "eligible but not funded" by "funding down the list".	Each allocation and subsequent funding round requires a new solicitation, triggering a multi-stage, competitive review process. CDFA will allow previous round's applicants to review and submit their prior submissions as-is or with modifications. Since every round is highly competitive, all applications must go through the review process again.
Applicants should be scored on the certainty and proof of project financing. CDFA should require that all project financing documents are conclusive and committal, or significantly lower the score if an applicant was unable to do so.	This is addressed in the CDFA's Review of project Financials.
All applicants should be required to utilize the same quantification methodology and DDRDP Benefits Calculator Tool as published by CARB.	Utilizing the latest DDRDP Benefits Calculator Tool is a requirement for DDRDP.
Prior to release of 2020 DDRDP Request for Grant Applications (RGA), conduct an internal audit of the DDRDP grant program to assess and consider for adoption the best practices and protocols that been put in place at other GGRF administering agencies.	All GGRF-funded programs, including those at CDFA, are subject to state audits. CDFA is in the process of evaluating other GGRF-funded program processes at this time.
Include a stand-alone scoring section for qualifications of the organization submitting the application; there is currently only one question addressing this in a 20-point section.	The RGA for DDRDP includes scoring criteria for evaluating qualifications of the submitting organization, which can be found under the Digester Project Plan and Long-Term Viability section, particularly Supporting Materials 1.2.
Notify reviewers including the Administrative Review Team and the Financial Review Team, when existing applicants are unable to meet timelines associated with previous work plans funded by the DDRDP program.	All projects have met current funding requirements and contractual obligations. There may be numerous issues that arise including weather or wildfire impacts and we would like to provide the flexibility to the dairy producers, our primary stakeholders who offer up their dairy operations and land, that their projects will be completed in compliance with the grant agreement terms.
Amend application to include a standard Terms and Conditions contract.	Terms and Conditions are only provided to successful applicants and are included as part of the grant agreement. This is standard practice for all CDFA-funded programs. The Grants Awards Procedures for the DDRDP are available on the DDRDP website at: https://www.cdfa.ca.gov/oeffi/ddrdp/resources.html
Clearly disclose the process that successful awardees will need to utilize in order to request contract extensions and changes to approved budget and work plans to avoid giving a competitive advantage to existing awardees.	Information on the process for requesting contract extensions and changes to budget and work plans are publicly available in the Grant Award Procedures (GAP) manual, which can be found by visiting https://www.cdfa.ca.gov/oeffi/ddrdp/resources.html .
Include criteria to evaluate applicant's ability to execute the project in the time frame required by the solicitation and proposed in the work plan based upon history and experience as part of the "Project Readiness" section.	All projects have met current funding requirements and contractual obligations. There may be numerous issues that arise including weather or wildfire impacts and we would like to provide the flexibility to the dairy producers, our primary stakeholders who offer up their dairy operations and land, that their projects will be completed in compliance with the grant agreement terms. CDFA is required to report to the Joint Legislative Budget Committee regarding any failed digester projects within three months of project failure.
Have applicants provide proof of private cost share at the time of application.	CDFA Audits Office reviews documents provided by applicants to demonstrate financial soundness as part of the scoring criteria. For awarded projects, CDFA tracks spending of matching funds on a quarterly basis to ensure it is consistent with that of grant funds expenditure.
Include an evaluation of GHG reduction per dollar per total project budget (instead of total grant funds requested).	The cost-effectiveness is calculated against the funds requested from the grant (or GGRF dollars) to be consistent with data reported to CARB for Annual Report to the Legislature. Cost-effectiveness is not scored against total project cost or other non-GGRF funding sources. DDRDP requires applicants to provide a minimum of 50% cost share to eligible for funding.
Include a requirement that applicants should not utilize other public funds as cost share so that there is no double-counting of GHG benefits.	CARB Funding Guidelines for Agencies that Administer California Climate Investments (available at https://ww2.arb.ca.gov/resources/documents/cc-i-funding-guidelines-administering-agencies) do not exclude other funding sources for a project including state/federal funding and provides a methodology to calculate project cost benefits without double counting.
Make an application debrief be mandatory by the scoring team immediately after the notice of proposed award; make score sheets and score notes available to all applicants (for own applications and competitor applications); make all applications available within 24 hours of the agency announcing awardees; ALL of these should be made public prior to the execution of grant agreements and contracts with proposed awardees.	CDFA will post a list of applicants and scores immediately following the Notice of Proposed Award on our website at https://www.cdfa.ca.gov/oeffi/ddrdp/ . Any additional information can be requested through the California Public Records Act (PRA). De-brief meetings are available upon request.
Clearly disclose that projects funded with public dollars aren't confidential; allow applicants to submit a confidential appendix for sensitive information, making it easier for CDFA to distribute applications immediately and remain consistent with the PRA, rather than taking over a year to produce heavily redacted applications that make the evaluation of project assumptions and benefits impossible for members of the public.	Information regarding confidentiality can be found in Appendix C of the RGA. Confidential information such as herd size, which are a critical part of several application sections (e.g., Dairy Digester Project Plan and Long-Term Viability, Estimated GHG Emissions Reduction, and Environmental Performance), business and financial information are exempt from public disclosure per Government Code Section 6254(k) and Evidence Code Section 1060.
All contracts, requests for contract extensions or modifications, and major changes to budget and work plans should be noticed and made publicly available.	Information can be requested through the California PRA.
Communicate in the 2020 DDRDP RGA that payments to dairy farms and site hosts, either as a percentage or fixed fee, based on a successful CDFA grant award are not authorized use of public funds.	This is not allowable cost under the DDRDP program, please see page 8 of the RGA.
CDFA should include heifer ranches in DDRDP as this allows for significantly methane emissions reduction.	CDFA will not expand eligibility criteria for the 2019-20 DDRDP funding round to include heifer ranches due to reduced funding.
CDFA should include in the RGA a "DDRDP Demonstration Projects" component comparable to what was present in the 2019 DDRDP Demonstration Program (released on Dec 28, 2018). In addition, the terminology to be used for any demonstration project program component needs to be clarified, i.e., this program pertains to "pilot (emphasis ours) and demonstration projects", as the term "demonstration projects" could be misconstrued to imply a specific technology readiness level. A minimum of \$2 million should be made available for "pilot and demonstration projects" solicitation. CDFA should ensure there is a direct nexus between successful completion of an eligible "demonstration or pilot project" and the scope of what CDFA determines to be a "commercially-available technology" eligible under the 2020 DDRDP RGA.	Given the reduction in funding and lack of competitive demonstration projects, CDFA will not fund Demonstration Projects through the 2020 DDRDP. CDFA may re-evaluate this option if more funds are appropriated in the future.

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Support the addition of points awarded to new developers. However, also ensure to award five points to all developers (both new and experienced applicants) that have a proven track record of completing their prior projects in the original timespan published with prior RGAs.	All developers have proven record of meeting project timelines till date. Therefore, five points are proposed for new and additional developers only.
Applicant's past performance should also be given more attention during scoring committee review.	All developers have proven record of meeting project timelines till date. Therefore, five points are proposed for new and additional developers only.
Do not support addition of points to new developers, as program funds should be used to the timely and cost effective completion of already awarded dairy digesters and to proven developers.	All developers have proven record of meeting project timelines till date. Therefore, five points are proposed for new and additional developers only.
Draft RGA calls for 12 point Arial font instead of 11 point Times New Roman font, which will result in a reduction of words allowed by 20% or more. However, the CDFA general trend is to ask for more detail or explanation which conflicts with this change.	The page limit will be increased to accommodate for this change.