Build Kansas Fund | Fiscal Year 2024 Application Package | Memo



To: Senator Ty Masterson, Chair, Build Kansas Advisory Committee

Murl Riedel, Kansas Legislative Research Department Shauna Wake, Office of the Kansas State Treasurer

From: Matthew Volz, Executive Director, Kansas Infrastructure Hub

RE: Build Kansas Fund Application #2024-028-40101d-ArkValley

Date: April 12, 2024

Attached, please find an application made to the Build Kansas Fund by the Arkansas Valley Electric Cooperative Association, Inc. The application packet includes the following items:

- Coversheet provides a high-level overview of the application including a unique identification number, page 1 of 21 of the Build Kansas Fund Application Package.
- Build Kansas Fund Application includes information submitted with the Build Kansas Fund Application, pages 2-10. Page 10 provides the table of funding sources.
- Attachments Copy of BIL application, pages 11-21.

Project Overview

Under the Preventing Outages and Enhancing the Resilience of the Electric Grid - Section 40101(d), the U.S. Department of Energy (DOE) provides grants to States to improve the resilience of their electric grid against disruptive events. The Kansas Corporation Commission (KCC) received more than \$13.3M from the DOE for fiscal years 2022 and 2023. During the application period, KCC received 31 submissions, with more than \$40.1M in project funding requests. Ultimately, the agency selected 11 applicants across Kansas with Build Kansas Fund requests totaling \$5.84M, unlocking \$12.09M in federal funding.

Arkansas Valley Electric seeks funding from the Kansas Corporation Commission (KCC) available through the 40101d program. The AVEC System Resiliency Project will replace old overhead conductors and underground cables, install new monitoring and control technologies, and relocation of power lines.

This opportunity is a pass-through discretionary BIL program with a local match requirement of 48.33%. The entity is requesting \$235,421.34 from the Build Kansas Fund. This request has the potential to unlock \$487,078.66 in federal funds.

The State's internal deadline for 40101d applications to Kansas Corporation Commission was December 29, 2023. This is an ongoing Federal program; however, it would be advantageous for the State to submit its application package as soon as possible. This Build Kansas Fund application was received on March 22, 2024, and subsequently deemed acceptable for this program.

Build Kansas Fund Steering Committee Recommendation

The Build Kansas Fund Steering Committee reviewed this application on April 3, 2024, following a successful completeness check. The Steering Committee **RECOMMENDS APPROVAL** of Build Kansas Funding to the Build Kansas Advisory Committee for final advice.

Build Kansas Fund | Fiscal Year 2024 Application Package | Coversheet



Build Kansas Fund Application Number	2024-028-40101d-ArkValley		
Project Name	AVEC System Resiliency Project		
Entity Type	Non-Profit		
Economic Development District (EDD) Planning Commission	South Central Kansas Economic Development District		
Infrastructure Sector(s)	Energy		
BIL Program	Section 40101(d): Preventing Outages & Enhancing the Resilience of the Electric Grid		
BIL Program Type	Discretionary (Pass-Through)		
BIL Application Deadline	12/31/2023		
Build Kansas Fund Request	\$235,421.34		
Technical Assistance Received	General No BIL Application No Build Kansas Fund Application Yes Other (Brief Description): Support application submission and budget		
Application Notes	Build Kansas Fund contribution of \$235,421.34 will unlock \$487,078.66 in federal BIL funding.		

Steering Committee Funding Recommendation	4/3/2024 Recommend
Advisory Committee Target Review	DATE Recommend or Deny
Advisory Committee Funding Recommendation	DATE Approve or Deny

Completeness Review Data

Date Build Kansas Application Received:	3/22/2024
Date Of Completeness Check:	3/29/2024
Date Forwarded to Steering Committee:	3/31/2024

Title

The Ark. Valley Electric Cooperative Association, Inc.

03/22/2024

id. 45987277

by Jackie Holmberg in Build Kansas Fund Fiscal Year 2024 Application

jholmberg@arkvalley.com

Original Submission

03/22/2024

Score	n/a
	Part 1: Applicant Information
The name of the entity applying for the Build Kansas Fund:	The Ark. Valley Electric Cooperative Association, Inc.
Project Name:	AVEC System Resiliency Project
Entity type:	Non-Profit
Applicant Contact Name:	Jackie Holmberg
Applicant Contact Position/Title:	General Manager
Applicant Contact Telephone Number:	+16206626661
Applicant Contact Email Address:	jholmberg@arkvalley.com
Applicant Contact Address:	10 East 10th Ave.
Applicant Contact Address Line 2 (optional):	
Applicant Contact City:	South Hutchinson
Applicant Contact State:	Kansas
Applicant Contact Zip Code:	67505

Is the Project
Contact the same as
the Applicant
Contact?

Yes

Part 2: E	Build Kansas	Fund -	Eligibility	Criteria
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Certify that you are pursuing a viable Bipartisan Infrastructure Law (BIL) funding opportunity for which your entity is eligible:

Yes

Certify that the Bipartisan Infrastructure Law (BIL) funding opportunity you are pursuing has a required non-federal match component: No

Based on your selection, you may not be eligible. The Build Kansas Fund must be used for grants with a required match under the Bipartisan Infrastructure Law (BIL) and be funded through the BIL. Please refer to the Build Kansas Fund requirements before continuing and please reach out to a Kansas Hub Capacity Extension Team member to provide further assistance.

What is the primary county that the project will occur in?

Reno County

The Build Kansas Fund is intended to support Kansas-based infrastructure projects. Please provide a list of all the zip codes this project will be located in, along with an estimated percent [%] of the project located in that zip code. For example, if seeking funding for road infrastructure, provide a rough percent of the roads expected in each zip code:

Zip Code Percentage.xlsx

Part 3: Bipartisan Infrastructure Law (BIL) - Grant Application Information Please Note: This information is related to the federal Bipartisan Infrastructure Law (BIL) funding opportunity to which you will apply. This is NOT information for the Build Kansas Match Fund.

Please enter the Bipartisan Infrastructure Law (BIL) funding opportunity title that the entity is applying for:

SECTION 40101(d): Preventing Outages & Enhancing the Resilience of the Electric Grid

What is the funding U.S. Department of Energy agency for this Bipartisan Infrastructure Law (BIL) funding opportunity? 81.254 What is the **Assistance Listing** Number (ALN) for this **Bipartisan** Infrastructure Law (BIL) funding opportunity? What is the 12/31/2023 application due date for this Bipartisan Infrastructure Law (BIL) funding opportunity? What is the federal 2024 fiscal year for this Bipartisan Infrastructure Law (BIL) funding opportunity? \$487,078.66 Enter the amount of funding being applied for, from the Bipartisan Infrastructure Law (BIL) funding opportunity: Enter the required 48.3333 non-federal match percentage: Part 4: Build Kansas Fund - Match Application Information Enter the non-federal \$235,421.34 match amount being requested from the Build Kansas Fund: Is the project able to Yes move forward with a lesser match amount

than requested?

If you are awarded less match than the amount requested, at what amount would your project NOT be able to move forward?

\$150,000.00

Expected breakdown of funding sources to support the project: Enter the funding source and projected amount from each source to support this project:

Kansas+DOT+table.xlsx

	Part 5: Build Kansas Fund - Means Test
Confirm that there are no available funding sources currently planned to go unused by your entity that could be leveraged for this project:	Yes
Confirm there are no available American Rescue Plan Act (ARPA) or Coronavirus State & Local Fiscal Recovery Fund monies that could be used for this match:	Yes
Confirm that you have explored other readily available funding sources (federal or nonfederal) to be used for this match:	Yes

Briefly describe your efforts to find other available funding sources for this project:

AVEC explored numerous funding options for its matching requirement. Ultimately, AVEC decided to set aside current available funds for the matching requirement, and these funds are still available for the project.

However, AVEC has several other infrastructure improvement projects planned for FY 2024 and beyond, including:

- 1) Reconductoring copper weld conductors in growing areas of the service territory
- 2) Replacing poles on 3 phase feeder lines
- 3) Upgrading an existing substation with more efficient power point design and adding capacity to better serve the area

These priority projects were not eligible for 40101(d) funding because they didn't meet the resiliency thresholds outlined in the application requirements. They are still priority projects that will better support AVEC's rural customer base and provide much needed system improvements.

Given AVEC's current budget constraints and ongoing projects, a Build Kansas Fund match would allow AVEC to reallocate \$235,421.34 away from the 40101(d) projects to other priority projects, which would have significant positive impacts on those project budgets and timelines.

Part 6: Additional Information

Please upload a copy of the Bipartisan Infrastructure Law (BIL) program application associated with this request OR a 2-page executive summary providing an overview of the project:

40101d_App_Ark_Valley.pdf

Provide any about this project (optional):

Ark Valley Electric Cooperative (AVEC) completed its application for the additional information 40101(d) program in December 2023, and in late February 2024, KCC notified AVEC that its application had been selected for the 2024 funding cycle. In the application, AVEC indicated that they had set aside matching funds for the project, and these funds are still available.

> Ark Valley is seeking a matching fund grant through the Build Kansas Fund in order to reallocate the funds set aside for the 40101(d) match for other important infrastructure projects. The 40101(d) program focuses heavily on resiliency projects, and AVEC will use this funding for several projects geared towards improving system resiliency including replacing aged poles and copper weld conductors, upgrading, monitoring and control technologies, and relocating lines to public ROWs that can be more easily accessed during disruptive events.

> However, the 40101(d) program strictly prohibited the construction of new infrastructure and other technology and innovation projects on AVEC's system. The 40101(d) project (\$722,500) represents roughly 2/3 of AVEC's maintenance and capital improvement budgets for the previous two years. The match requirement (\$235,421) is about 22% of the maintenance and capital improvement budget. Every AVEC matching dollar spent on the 40101(d) projects is crucial to system resiliency, but it is also another dollar that can't be allocated to other important projects.

Additionally, AVEC primarily serves rural and disadvantaged communities. Two areas in AVEC's service territory are classified as disadvantaged in the Council on Environmental Quality's Climate and Economic Justice Screening Tool: census tracts 20155001700 and 20155001800. Including the 40101(d) grant, the pro rata per customer cost is more than \$230, which is a significant cost burden to both AVEC's rural and disadvantaged customers. A matching dollar grant through the Build Kansas Fund would also help reduce the project's financial burden on AVEC's disadvantaged customer base.

	Part 7: Terms and Conditions
Understanding of Fund Release Requirements:	checked
Understanding of Use of Funds:	checked
Understanding of Reporting Requirements:	checked
Authority to Make Grant Application:	checked

The following Holmberg persons are responsible for making this Build Kansas Fund application. Position/Title: General Manager Additional: Position/Title: Additional: Position/Title: Additional: Position/Title: **Internal Form** Score n/a **Pre-Award Information:** Eligible for Build Kansas Fund? EDD / Region: Project Primary Zip Code: Sector: Application ID: BKF pre-obligated amount: Post-Award Information: Awarded BIL Grant? **Deviation Report: Deviation Type:**

Persons and Titles:

Deviation Summary:

Jackie

Deviation Date:

		% of project	t in
Source	Amount	Zip Code zip code	
BIL Federal Funds (applied for)	\$ 487,078.66	67568	15
Build Kansas Funds (non-federal match)	\$ 235,421.34	67502	15
Additional Project Contribution (if applicable)	\$ -	67035	40
		67457	30
TOTAL PROJECT COST	\$ 722,500.00		100



SECTION 40101(d): Preventing Outages & Enhancing the Resilience of the Electric Grid

Section 1: Applicant Information

Entity name:

The Ark. Valley Electric Cooperative Association, Inc.

Entity Type:

Distribution Provider

Entity address:

10 East 10th Ave.

South Hutchinson, KS 67505

US

Employer Identification Number (EIN):

48-0124045

Unique Entity Identifier (UEI):

PTA7TMU62MK6

Please upload verification of eligible entity size and documentation of annual sales per year:

2021_and_2022_Entity_Size_and_Annual_Sales.pdf



EIA Table



	А	В	С	D	
1	Entity	State	Ownership	Customers (Count)	Sale (mei
2	Alfalfa Electric Coop, Inc	KS	Cooperative	910	1666
3	CMS Electric Coop Inc	KS	Cooperative	5863	198(
4	City of Chanute	KS	Municipal	5599	273
5	City of Coffeyville - (KS)	KS	Municipal	5898	775 ⁻
6	City of Garden City	KS	Municipal	11762	304
7	City of Kansas City - (KS)	KS	Municipal	66775	209
	City of				*

Project Manager name:

Jackie Holmberg

Project Manager phone number:

+16206626661

Project Manager e-mail address:

jholmberg@arkvalley.com (mailto:jholmberg@arkvalley.com)

IRS Form W-9:

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Latest financial statement and financial statement audit:

1222_-_Final_Audited_Financial_Statements_-_AVEC.pdf



Please acknowledge whether your entity has ever submitted an application, similar in nature, to the DOE under BIL Section 40101c, DE-FOA-002740, Grid Resilience and Innovation Partnerships (GRIP):

No

Section 2: Project Description and Scope

Project Name:

AVEC System Resiliency Project

Project type:

Replacement of old overhead conductors & underground cables

Project description and scope:

Ark Valley Electrical Cooperative is seeking \$307,000 in funding through KCC's 40101(d) program for crucial infrastructure improvements throughout the cooperative's service territory. The project impacts several small rural communities in South Central, KS including Halstead (pop. 2,165), Cunningham (pop. 462), and several unincorporated areas in the region (Huntsville / Sandhill, Galyons, and Calista). The infrastructure in these areas is aging and is a liability to the system's reliability in these regions.

Ark Valley seeks to rectify these vulnerabilities through the AVEC System Resiliency Project, which will focus on (1) replacing old conductors, (2) new monitoring and control technologies, and (3) relocation of power lines. These improvements will greatly improve the overall system's resiliency and reliability. Project specifics are outlined below:

(1) Replacing Old Conductors

Halstead - AVEC will rebuild 2 miles of copper weld conductor and poles to modern standards, including upgrading the line to Aluminum-conductor steel-reinforced cable (ASCR). The current conductor size impedes also impedes the full ampacity of the circuit, so this project will also allow AVEC to utilize this line for multiple feed scenarios in critical situations to maintain a continuous flow of power. This line serves rural members and a rural telecommunications infrastructure.

Galyons - AVEC will reconstruct 3/4 mile of aged poles and copper weld conductor. Circuit ampacity and voltage stability will also increase with this project providing more reliable and stable to the 23 rural members served by the line, including rural residences, oil wells, oil tanks, cattle operation, and feed lot.

Calista - AVEC will rebuild 3 miles of aged conductor and poles on a radial feed line that services 20.2 miles, 38 residential members, and an internet provider. Currently, the line is a weak point in the line between ACSR lines. The improvement will also aid in needed voltage support during high peak demand, further improving reliability of service.

(2) New Monitoring and Control Technologies

Huntsville / Sandhill - AVEC will change out 8 controls to the VWE rom Form 4C to the updated Form6/7 controls. Upgrading the controls will allow AVEC to communicate on multiple fronts, examine line status and stability, and utilize data to mitigate blinks and shorten outage times. This will also improve linemans' troubleshooting capabilities by giving them the ability to identify locations of faults and interruptions, further shortening outage duration.

(3) Relocation of Power Lines

Cunningham - AVEC will remove 1.2 miles of line out of hard to access private right of way. AVEC has had problems accessing this line in the past for regular maintenance and service interruptions, so it will be relocated into a public ROW for easy maintenance and repair. This relocation will also include replacing old conductors to ensure the longevity of the investment and continuity of service on the radial feed line. This line currently serves farmstead and rural residential members.

While Ark Valley has numerous infrastructure priorities, these projects have been identified these as critical projects for continuity of service and therefore uniquely suited for the 40101(d) project funding opportunity. These projects are in the initial planning phases and have not received any other state or federal funding.

Section 3: Need for Funding

Ark Valley has explored several funding options for these improvements. The overall project cost of \$722,500 represents a significant burden on the cooperative. In 2022 and 2023, AVEC's total budget for maintenance and capital improvement was \$1,060,000 and \$1,079,000. The budget for 2024 has not yet been finalized, but assuming a similar amount is budgeted for 2024, these projects alone would represent about 2/3 of the total budget.

These improvements serve rural members and have a high cost per member served - roughly \$400.72 per customer served. These improvements are critical in providing these members consistent and reliable power, but the project carries a significant cost to AVEC. With the aid of the 40101(d) funding, the pro rata cost per customer served would drop to \$230.45, and the improvements would represent less than half of the 2022 and 2023 maintenance and capital improvements budgets.

Additionally, two areas in AVEC's service territory are classified as disadvantaged in the Council on Environmental Quality's Climate and Economic Justice Screening Tool: census tract 20155001700 (Reno County) and census tract 20155001800.

Provide historical and post project estimated interruption frequency and duration data, if known.

Ark Valley experienced 15 unplanned outages in 2021 and 14 unplanned outages in 2022. In both cases, more than 5,000 customers were affected, so on average, each AVEC customer was affected by an outage at least once each year. The total customer outage minutes were 3,855,202 and 5,520,277 in 2021 and 2022.

In the first three quarters of 2023, the number of outages has already doubled to 31 affecting more than 9,000 customers (more than one outage per customer) with nearly 18,725,000 customer outage minutes.

Ark Valley has not estimated the impact that these improvements will have on system reliability, but the projects are targeting old and antiquated infrastructure and technology improvements to reduce outage times. AVEC expects these projects to improve overall system reliability.

Provide pro rata customer impact of total project cost.

Total Customer Per Rata Project Cost: \$138.20 (5,228 customers - 2022)

Affected Customer Per Rata Project Cost: \$400.72 (5,228 customers - 2022)

Provide number of customers to be impacted by the project and percentage of impacted customers to total customers in the disadvantaged or underserved community.

In 2022, AVEC served 5,228 customers, the majority of which are rural members. The projects outlined in this narrative will impact more than 1/3 of all AVEC customers (1,803). All impacted members reside in rural areas throughout AVEC's service territory. A portion of the AVEC service territory lies within disadvantaged census tracts as outlined in the Climate and Economic Justice Screening Tool including tract numbers 20155001800 and 20155001700.

Section 4: Complete Budget and Narrative

Award amount requested:

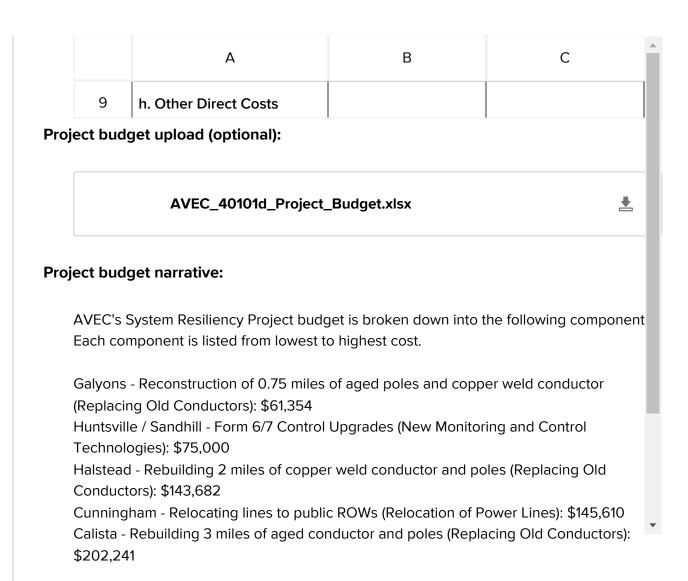
\$307000.00 USD

Matching funds to be provided:

\$415500.00 USD

Budget (Total Costs):

	А	В	C
1	CATEGORY	Federal (\$)	Non-Federal (\$)
2	a. Personnel	106780	130075
3	b. Fringe Benefits		
4	c. Travel		
5	d. Equipment		
6	e. Supplies	106780	130075
7	f. Contractual		36125
8	g. Construction	53390	65040



Note - these estimates are based on AVEC's current material and labor costs plus a 15% contingency to cover project overruns. AVEC will complete all construction in-house using existing staff and lineman.

Cost match commitment letter:



Section 5: Project Timeline

Project timeline:

AVEC anticipates completing all projects within 18-months of the grant award. A preliminary project timeline is outlined below:

February 2024 - KCC award recipients finalized

March 2024 to May 2024 - AVEC works with KCC to finalize grant agreement

June 2024 - AVEC finalizes project engineering & orders materials

December 2024 - AVEC begins improvement projects (assumes a 6 month fulfilment period)

June 2025 - AVEC completes all improvements

The project timeline can be broken down into 3 separate phases: grant agreement and engineering (6 months), construction material fulfilment (6 months), construction (6 months)

Section 6: Bids and Estimates

Bids and estimates:

Resilience_Grant_Estimates.pdf



Section 7: Community Benefit

Community benefit narrative:

TARGETING DISADVANTAGED COMMUNITIES Ark Valley serves a highly rural region in Kansas with members in Barton, Ellsworth, Harvey, Kingman, McPherson, Reno, Rice, Saline, and Stafford counties. These areas tend to be less well off economically than other regions within the state. Census tracts 20155001700 and 20155001800 in Reno County (southwest of Hutchinson, KS) are identified as disadvantaged on the Council on Environmental Quality's Climate and Economic Justice Screening Tool, and the region as a whole had a median household income of \$57,740 in 2022, more than \$7,000 lower than the state average and \$13,000 lower than the national average. Ark Valley's 2024 Resiliency Project will directly impact some of the most disadvantaged populations within the state. OVERALL COMMUNITY BENEFIT By replacing old and antiquated infrastructure, AVEC expects to significantly reduce the length and number of power outages in its service territory. These projects are specifically targeting AVEC's most vulnerable infrastructure. In fact, a significant number of unplanned outages are due to aging infrastructure. On average, the structures to be replaced in these projects range

from 50 to 60 years old, including the conductors, many of which are original to when the lines were constructed. This infrastructure is highly vulnerable to disruptive events, which are growing in frequency. Over the past 20 years, the region has experienced 24 FEMA disaster declarations due to significant weather events, including 20 severe storms, 2 snow storms, and 1 ice storm. The region has also experienced 4 fire disaster declarations over the past 20 years. These improvements will significantly improve the resiliency of AVEC's system allowing it to maintain power continuity during these disruptive events. TARGETING HIGHEST VALUE PROJECTS While determining what projects to include in its 40101(d) application, AVEC underwent a stringent selection process. Several projects made it to the high priority list, but those selected for the application were also the highest value projects for the system. Not only will the improvements replace some of the oldest and most vulnerable infrastructure throughout the system, they will also significantly increase line capacity, which will have major impacts on the reliability and longevity of the improvements. In all cases, ampacity is being increased to allow AVEC to maintain power continuity to its rural customers, even during disruptive events.

Provide historical measurements of resilience and reliability for the targeted areas of each proposed project.

Ark Valley experienced 15 unplanned outages in 2021 and 14 unplanned outages in 2022. In both cases, more than 5,000 customers were affected, so on average, each AVEC customer was affected by an outage at least once each year. The total customer outage minutes were 3,855,202 and 5,520,277 in 2021 and 2022. In the first three quarters of 2023, the number of outages has already doubled to 31 affecting more than 9,000 customers (more than one outage per customer) with nearly 18,725,000 customer outage minutes.

Provide expected changes to the historical data as a result of each proposed project.

AVEC anticipates the improvements to have a significant impact on overall system resiliency. The project is targeting some of the oldest and most vulnerable infrastructure in AVEC's service territory, and line capacities will be increased, improving the reliability and longevity of the infrastructure.

Provide historical measurements of resilience and reliability for the entire system to determine whether the project is in an area that has, on average, more frequent or longer duration outages.

In the past three years, AVEC has experienced 15 (2021), 14(2022) and 31(2023 through Q3) unplanned outages. In 2021 and 2022, more than 5,000 customers were affected by outages, an average of about 1 per customer. In 2023 (through Q3), more than 9,000 customers have experienced outages meaning that, on average, each customer has experienced about 1.75 outages. In 2023, average outage length has also more than

doubled from both 2021 and 2022. AVEC is targeting its most vulnerable and aging infrastructure for this project and projects with a higher proportional benefit to the overall system.

Provide age of system or line segments to be replaced or repaired, type of equipment that failed, and the number of annual outages for the project area.

On average, the age of the structures to be replaced range from 50 to 60 years old. In each case, the conductors are original to the structure. Overall, nearly 6 miles of copper weld conductor will be replaced.

Provide a number of protective devices (fuses or breakers) that have operated more than once in a rolling 12-month period.

Not applicable.

Provide a number of customers impacted by project and the percentage to total customers served in Kansas.

In 2022, Ark Valley served 5,228 customers in the state of Kansas. About 81% of its customers are residential with the remaining 19% classified as commercial (18%) and industrial (1%), and the majority of all customers are considered rural. The projects outlined in this application will impact roughly 1,803 of Ark Valley's customers directly.

Description of efforts to attract, train, and retrain a skilled workforce for this project.

AVEC will complete all project activities with existing in-house staff and lineman. Currently, there are no plans to hire additional staff to assist with the project. However, the project will provide new and existing staff and lineman with valuable on the job training opportunities and will help AVEC maintain a well skilled and highly knowledgeable staff.

Provide an estimate of job creation due to this project.

AVEC will complete all project activities with existing in-house staff and lineman. Currently, there are no plans to hire additional staff to assist with the project. However, the project will provide new and existing staff and lineman with valuable on the job training opportunities and will help AVEC maintain a well skilled and highly knowledgeable staff.

Identify any plans to partner with training providers to support workforce development.

AVEC supports workforce development and economic development throughout its entire service territory. AVEC provides high school juniors and seniors the opportunity to apply for scholarship opportunities for both college and lineman training. Ark Valley's awards \$4,500 annually to three deserving students planning to attend college or universities after high school. Additionally, AVEC also offers a \$1,000 Lineman Scholarship to graduating seniors (or recipient of a GED) planning to enroll in a Kansas line school.

Provide any other metric(s) that indicates potential community benefit.

None

Confirmation that the applicant will comply with all Davis-Bacon Act requirements.

Yes

Confirmation that the applicant will comply with all Buy America Requirements.

Yes

Confirmation that the applicant will submit an environmental questionnaire (NETL Form 451.1-1-3), if required, for each work area proposed in the application.

Yes