PMC-ND

(1.08.09.13)

U.S. DEPARTMENT OF ENERGY OFFICE OF ENERGY EFFICIENCY AND RENEWABLE ENERGY NEPA DETERMINATION



RECIPIENT: GRIDBRIGHT, INC STATE: CA

PROJECT TITLE: PIVA: PV Integration using a Virtual Airgap

Funding Opportunity Announcement Number Procurement Instrument Number NEPA Control Number CID Number

DE-FOA-0002437 DE-EE0009631 GFO-0009631-001 GO9631

Based on my review of the information concerning the proposed action, as NEPA Compliance Officer (authorized under DOE Policy 451.1), I have made the following determination:

CX, EA, EIS APPENDIX AND NUMBER:

Description:

A9 Information gathering, analysis, and dissemination Information gathering (including, but not limited to, literature surveys, inventories, site visits, and audits), data analysis (including, but not limited to, computer modeling), document preparation (including, but not limited to, conceptual design, feasibility studies, and analytical energy supply and demand studies), and information dissemination (including, but not limited to, document publication and distribution, and classroom training and informational programs), but not including site characterization or environmental monitoring. (See also B3.1 of appendix B to this subpart.)

A11 Technical advice and assistance to organizations

Technical advice and planning assistance to international, national, state, and local organizations.

Rationale for determination:

The U.S. Department of Energy (DOE) is proposing to provide funding to Gridbright, Inc to develop software to convert untrusted behind the meter PV telemetry into cloud-based, secure, clean, reliable data for grid operations. This software would neutralize operation impacts of both benign and malicious cyber-risks. The project would be completed over three Budget Periods (BPs) with a Go/No-Go decision point between each BP. This NEPA determination is applicable to all three BPs.

Gridbright would develop the necessary algorithms and software, named PIVA (PV Integration using a Virtual Airgap), from its virtual offices leveraging cloud technology. They would design and develop individual component modules by identifying and validating functional, technical, security, performance, and techno-economic requirements with core team members and a working group of project stakeholders. The data processing framework and algorithms to validate, transform, estimate, and aggregate PV data would be developed. An initial version of the software would be created and tested at the National Renewable Energy Laboratory (NREL) in a computer test lab to demonstrate progress towards overall performance targets. A team of cyber-security experts would conduct tests to identify security defects and detected issues would be resolved. The software would be integrated into hardware at San Diego Gas and Electric control center where the cloud-based software would be demonstrated through multiple cycles. A tech-to-market strategy would be created, and a letter of intent would be negotiated with a commercial go-to market partner. Techno-economic analysis would be run throughout.

The proposed project would consist solely of intellectual, academic, and/or analytical activities. All project activities would be conducted from existing offices or computational facilities and use no materials beyond basic office supplies, software, and computer hardware.

Any work proposed to be conducted at a federal facility may be subject to additional NEPA review by the cognizant federal official and must meet the applicable health and safety requirements of the facility.

NEPA PROVISION

DOE has made a final NEPA determination.

Notes:

Solar Energy Technologies Office This NEPA determination does not require a tailored NEPA provision. Review completed by Shaina Aguilar on 11/23/21.

FOR CATEGORICAL EXCLUSION DETERMINATIONS

The proposed action (or the part of the proposal defined in the Rationale above) fits within a class of actions that is listed in Appendix A or B to 10 CFR Part 1021, Subpart D. To fit within the classes of actions listed in 10 CFR Part 1021, Subpart D, Appendix B, a proposal must be one that would not: (1) threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, or similar requirements of DOE or Executive Orders; (2) require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities (including incinerators), but the proposal may include categorically excluded waste storage, disposal, recovery, or treatment actions or facilities; (3) disturb hazardous substances, pollutants, contaminants, or CERCLA-excluded petroleum and natural gas products that preexist in the environment such that there would be uncontrolled or unpermitted releases; (4) have the potential to cause significant impacts on environmentally sensitive resources, including, but not limited to, those listed in paragraph B(4) of 10 CFR Part 1021, Subpart D, Appendix B; (5) involve genetically engineered organisms, synthetic biology, governmentally designated noxious weeds, or invasive species, unless the proposed activity would be contained or confined in a manner designed and operated to prevent unauthorized release into the environment and conducted in accordance with applicable requirements, such as those listed in paragraph B(5) of 10 CFR Part 1021, Subpart D, Appendix B.

There are no extraordinary circumstances related to the proposed action that may affect the significance of the environmental effects of the proposal.

The proposed action has not been segmented to meet the definition of a categorical exclusion. This proposal is not connected to other actions with potentially significant impacts (40 CFR 1508.25(a)(1)), is not related to other actions with individually insignificant but cumulatively significant impacts (40 CFR 1508.27(b)(7)), and is not precluded by 40 CFR 1506.1 or 10 CFR 1021.211 concerning limitations on actions during preparation of an environmental impact statement.

The proposed action is categorically excluded from further NEPA review.

SIGNATURE OF THIS MEMORANDUM CONSTITUTES A RECORD OF THIS DECISION.

NEPA Compliance Officer Signature:	Soned By: Kristin Kerwin	Date:	11/24/2021
	NEPA Compliance Officer		
FIELD OFFICE MANAGER DETERM	MINATION		
✓ Field Office Manager review not req✓ Field Office Manager review require			
BASED ON MY REVIEW I CONCUR	WITH THE DETERMINATION OF THE NCO	:	
Field Office Manager's Signature:		Date:	
	Field Office Manager		