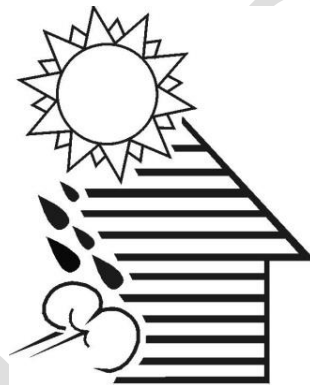




GOVERNMENT OF PUERTO RICO

Department of Economic Development and Commerce

ENERGY POLICY PROGRAM



*Weatherization
Works*

Puerto Rico Weatherization Assistance Program

STATE PLAN

2020

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SECTION 1: PROGRAM DESCRIPTION

I.1 Executive Summary

The Puerto Rico Weatherization Assistance Program (WAP or the Program) State Plan for Program Year (PY) 2020 describes the framework to be established for the application of weatherization funds allocated through PY 2020. Puerto Rico's WAP's funds allocation for PY 2020 is \$1,379,277.00. The guidelines set in 10 CFR Part 440 and the U.S. Department of Energy provided the framework for the development of the Program.

The Weatherization Assistance Program helps low-income families to attain a reduction of household energy expenditures, while securing and enhancing the health and safety of the home. The Program's matter of importance is to provide assistance to the elderly, families with children, and persons with disabilities. It is expected that for PY 2020 WAP will benefit approximately 126 households (owned or rented) in Puerto Rico.

Due to the warm climate of the Island, weatherization efforts will be directed at improving the efficiency of cooling systems, reduction in electrical energy demand of light fixtures and selected household appliances, installation of solar water heaters, hot water use reduction through shower heads and faucet aerators, and mitigation of energy-related health and safety concerns. To maximize the benefits of the Program, work will be performed by trained personnel, and the process will be monitored from initial client application to certification of completed weatherization work.

This State Plan is not a procedure manual; it is intended as a general guide about the funding and operation of the Program for PY 2020. Specific information regarding the operation of the Program will be contained in the Program's Operations Manual.

Section Two of the State Plan covers the initial allocation of funds for the Program and the organizational structure for its management.

Section Three is dedicated to discussing the work within the Program. This includes the assessment of client eligibility, geographical location of dwellings to receive assistance, and establishing priorities for the Program. The procedures used to determine the type of work to be performed are also covered, along with a description of weatherization measures, procedures followed to preserve the health and safety of occupants and work crews during the work, inspection of the dwelling after weatherization measures have been applied that assess improvements attained in energy usage and the health and safety of the occupants. It also discusses the time frame in which weatherization work will take place, training and monitoring activities, and the process followed to start-up the program.

I.2 Program Overview

The Weatherization Assistance Program (WAP) was created in 1976 to assist low-income families who lacked resources to invest in energy efficiency. In PY 2009 Puerto Rico was included for the first time in WAP; this is its tenth year. The Program's mission is to reduce energy costs, while ensuring the health and safety, for eligible low-income families with priority for households with children, elderly and persons with disabilities.

In Puerto Rico, the Program is administered by the Department of Economic Development and Commerce's (DEDC) Energy Policy Program (EPP) acting as the Grantee. DEDC's EPP administers the WAP in compliance with applicable laws; including regulations contained in 10 CFR Part 440, 2 CFR Part 200, DOE WAP notices and other procedures applicable to these regulations as the United States Department of Energy (DOE) may prescribe for the administration of financial assistance.

Further, Program services will also be delivered by DDEC's EPP. The Program services includes, but not limited to, identifying eligible customers, evaluating the dwelling units to be weatherized, training of personnel, installation of energy-saving measures, supervision of weatherization work, maintenance of customer files and report drafting.

SECTION 2: ANNUAL FILE (PAGE-SECTION IV)

II.1 Sub-grantees

The DEDC's EPP WAP Division will operate WAP's PY 2020 annual grant in-house and perform the Program's services. Therefore, DEDC will act as a Direct Service Grantee where no sub-grantee will perform the program services for WAP's PY 2020. DEDC will meet the requirements established in the 10 CFR 440.15.

II.2 Production Schedule

Total Units (excluding reweatherized)	126
Rewatherized Units	0

Average Unit Costs, Units subject to DOE Project Rules	
VEHICLES & EQUIPMENT AVERAGE COST PER DWELLING UNIT (DOE RULES)	
A Total Vehicles & Equipment (\$5,000 or more) Budget	0
B Total Units Weatherized	126
C Total Units Reweatherized	0
D Total Dwelling Units to be Weatherized and Reweatherized (B+C)	126
E Average Vehicle & Equipment Acquisition Cost per Unit (A divided by D)	0
AVERAGE COST PER DWELLING UNIT (DOE RULES)	
F Total Funds for Program Operations	\$965,088.00
G Total Dwelling Units to be Weatherized and Reweatherized (from line D)	126
H Average Program Operations Cost per Unit (F divided by G)	\$ 7,669.00
I Average Vehicle & Equipment Acquisition Cost per Unit (from line E)	0
J Total Average Cost per Dwelling (H plus I)	\$ 7,669.00

II.3 Energy Savings

Method used to calculate energy savings:

WAP algorithm:

Other (describe below):

Method used to calculate savings description:

The energy savings measurement number included on the application (1,459.2 KWH, equivalent to 4.97MBTU annually, was the "Actual Average Yearly Savings per Weatherized Unit as per Puerto Rico's Energy Power Authority (PREPA) billing Information)" from WAP ARRA 2009-2012. This number was offered by our previous WAP ARRA sub-grantee, Puerto Rico's Infrastructure Financing Authority (AFI), on their Final Report PY 2009-2012. The method used to calculate savings was modified to "other" instead of WAP algorithm. This was necessary since the values of annual energy savings given by the WAP algorithm are too high for Puerto Rico.

Average annual energy savings (KW-hr): 1,459.2 /year = 4.97 MBTU

This year estimated energy savings:	4.77	
Prior year estimated energy savings:	4.47	Actual (prior year): -

II.4 DOE-Funded Leveraging Activities

DEDC’s EPP does not expect to perform DOE-funded leveraging activities.

II.5 Policy Advisory Committee Members

The Policy Advisory Council has special qualifications and sensitivity with respect to solving the problems of low-income persons, and is broadly representative of organizations and agencies including consumer groups that represent low-income persons. The Council is responsible of advising DEDC’s EPP the allocation of financial assistance in the State or area with respect to the development and implementation of the Weatherization Assistance Program. Following is a list of Puerto Rico’s Policy Advisory Council Members with their names and contact information:

<p>Dr. Carmen Delia Sánchez Salgado Director Office of the Advocate for Persons of Advanced Age Po Box 191179 San Juan, Puerto Rico 00919-1179</p>
<p>Mr. Gabriel Corchado Mendez Defender Office of the Advocate for Persons with Disabilities PO Box 41309 San Juan, Puerto Rico 00940-1309</p>
<p>Hon. Eddie Garcia Fuentes Secretary Department of the Family PO Box 11398 San Juan, Puerto Rico 00910-1398</p>
<p>Ing. Gabriel Hernandez Rodriguez Assistant Secretary Permits Management Office PO Box 41179, Minillas Station San Juan, Puerto Rico 00940</p>
<p>Ing. Jeramfel Lozada Ramirez President</p>

Association of Renewable Energy Contractor Consultants PO Box 16714 San Juan, Puerto Rico 00908-6714
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II.6 Hearings and Transcripts

Pursuant to 10 CFR Part 440.14 (a), Puerto Rico celebrated a public hearing to receive comments on the proposed WAP's State Plan (PY) 2020. WAP's State Plan's public hearing was held last April 24, 2020, starting at 10:00am and concluding at 11:00am, in 355 F.D. Roosevelt Ave., PRIDCO Building, 4th Floor (Teatrito), San Juan, Puerto Rico 00918.

Last April 11 and 18, 2020 the public hearing announcement was published in DEDC's webpage and in Puerto Rico's Primera Hora and El Nuevo Dia, a general circulation newspapers. Copy of the proposed State Plan was available during workable hours from 8:00am to 4:30pm at EPP's premises: 355 F.D. Roosevelt Ave., PRIDCO Building, Suite 207, San Juan, Puerto Rico 00918. The State Plan could have also been requested by email at wap@ddec.pr.gov.

II.7 Miscellaneous

Clarification Note No. 1: The objective of EPP's WAP Division is to weatherize the most possible dwellings in a cost effective way to achieve the necessary economy of scale in the operational costs. Therefore, WAP Division will use any surplus amounts of money, if any, in the weatherization of additional units.

Clarification Note No. 2: To distinguish the different tasks that will be conducted by DEDC's EPP this PY, DEDC will be referred as "Grantee" when it is administering the Program and will be referred as "Subgrantee" when it is providing weatherization services. DEDC's EPP, even though is performing as both Grantee and Sub-grantee, is the same governmental entity (Direct Service Grantee).

SECTION 3: MASTER FILE (PAGE-Section V)

III.1 Eligibility

III.1.1 Approach to Determining Client Eligibility

Description of the definition of income used to determine eligibility:

A dwelling unit shall be eligible for weatherization assistance if it is occupied by a family whose income is at or below 200% of the poverty level determined in accordance with criteria established by the Director of the Office of Management and Budget (OMB) or contains a member who has received cash assistance payments under Title IV or XVI of the Social Security Act or applicable State or local law at any time during the 12-month period preceding the determination of eligibility for weatherization assistance.

The PY 2018 income eligibility thresholds are the following:

Size of Family Unit	Threshold	200%
1	\$12,760	\$25,520
2	\$17,240	\$34,480
3	\$21,720	\$43,440
4	\$26,200	\$52,400
5	\$30,680	\$61,360
6	\$35,160	\$70,320
7	\$39,640	\$79,280
8	\$44,120	\$88,240

For families with more than 8 persons, 100% of poverty level increases \$4,480 for each additional person. Therefore, for weatherization at 200% of poverty level, add \$8,960 for each additional person.

Income refers to total cash receipts, before taxes, from all sources for all people living in the dwelling unit. This includes money, wages and salaries before any deductions but do not include food or rent in lieu of wages. Other receipts would be public assistance, social security, unemployment and workers compensation, strike benefits from union funds, veteran's payments, training stipends, regular foster parent grants or payments, alimony, child support, and military family allocations or other regular support from an absent family member or someone not living in the household, private pensions, government employee pensions, regular insurance or annuity payments, grants, scholarships and work study, income from dividends, interest, rents, royalties, or periodic receipts from estates or trust and lottery earnings if paid monthly or annually.

Not considered income are capital gains, any assets drawn down as withdrawals from a bank, sale of property, house, or car, tax refunds, gifts, lump-sum inheritances, one-time insurance payments, or compensation for injury. Also excluded are non-cash benefits, food or rent received in lieu of wages, energy grants, student loans, and bank loans.

The period of time for income eligibility will be the 12 month period preceding the determination of eligibility for weatherization assistance.

Description of what household Eligibility basis will be used by the Program

Please Refer to attachment "Extract_WAP-PR_Operational Manual_Sect.4+5_Priority Population and Eligibility" for more information.

Description of the process for ensuring that qualified aliens are eligible for weatherization benefits

To ensure qualified aliens eligibility, an important step is to verify nationality and if the individuals are permanent resident aliens. After verification of qualified alien status, the procedures and eligibility criteria will be the same established in this section for households' income.

The procedure for proof of nationality is the following:

Individuals receiving weatherization assistance shall be U.S. Citizens or qualified aliens. The weatherization application requests the applicant to attest to their citizenship or alien status under penalty of law. However, to minimize fraud, applicants will be required to provide one of the following forms of evidence:

- Citizens
 - Birth Certificate
 - Passport
 - Social Security Card (original) with copy

- Permanent Resident Aliens
 - Permanent Resident Card (Green Card / INS Form I-551)
 - Security Card (original) with copy

III.1.2 Approach to Determining Building Eligibility

Procedures to determine that units weatherized have eligibility documentation

A EPP's technical coordinator will review and verify that all documents submitted by the client in the application form (the Application Form) are in compliance with the Program's requirement and eligibility parameters. The list of all the pertinent documents required for the completion of the Application Form will be available EPP's physical premises, located at 355 F.D. Roosevelt Ave., PRIDCO Building, Suite 207, San Juan, Puerto Rico 00918, or sent by email, if requested, at wap@ddec.pr.gov. The documents required for the application are the following:

1. Authorized Representative
2. Income
3. Proof of Ownership of the Unit to be weatherized
4. Proof of Identity
5. Proof of Residency
6. Proof of Nationality

The Client File will include the following forms and documents:

- Applicant Forms: WAP Application (CF-1), Applicant Agreements (CF-2), Authorized Representative Form (CF-3), Declaration of Income Form (CF-4), Declaration of Zero Income (CF-5), Owner Authorization for a Rented Dwelling Unit (CF-6), Declaration of Ownership (CF-7), Request for Additional Information Form (CF-8), Notice of Incomplete Application (CF-9), Notice of Eligibility (CF-10), Notice of Ineligibility (CF-11), Notice of Denial of Services (CF-12), Notice of Postponement of Services (CF-13), Notice of Weatherization Works to be Performed (CF-14).
- Office Forms: Intake Application Checklist (OF-1), Application QC Form (OF-2), Declaration of Weatherized Unit (OF-3), Eligibility Committee QC manager Form (OF-4)
- Auditors Forms: Auditor Report and Questionnaire (AF-1), Unit Floor Plan Drawing (AF-2)
- Technical Coordinator Forms: Refrigerator Contractor Work Order Form (CWO-1), Air Conditioner Contractor Work Order Form (CWO-2), General Contractor Work Order Form (CWO-3), Solar Water Heater Contractor Work Order Form (CWO-4),
- Inspector Form: Inspector Report (IF-1)
- Additional Information:
 - Financial documentation (ie. Invoices, etc)
 - Auditors and Inspectors Reports (ie. Photo Report),
 - Documentations required in the forms mentioned above,
 - Copy of correspondence, letters to clients.
 - Lead Paint notification, Mold and Moisture assessment, is included on the auditor and contractor report.

By the end the of the weatherization process, all pertinent documents mentioned above must be included as part of the complete client file.

For more information about the applicants documentation, please refer to Attachment "Sect 9.0_Applicant Documentation_WAP-PR Operation Manual".

Description of Reweatherization compliance

Currently, re-weatherization does not apply to Puerto Rico since the Island was qualified to receive WAP funds for the first time last 2009; on 2029 rewaetherization may commence on dwellings weatherized during WAP period.

To ensure that Puerto Rico is not providing weatherization services to any dwelling more than once in any 20 years period, EPP has a database of all past weatherized units by the Program. Before conducting any weatherization activity on a dwelling, all new units are first verified against the database to ensure that no dwelling is being weatherized twice.

Describe what structures are eligible for weatherization

Please Refer to attachment "Extract_WAP-PR _Operational Manual_Sect.4+5_Priority Population and Eligibility" for more information.

Describe how Rental Units/Multifamily Buildings will be addressed

Rental Units:

As specified in 10 CFR 440.22 (b), the grantee may weatherize rental dwelling units. The following conditions shall be followed when weatherizing rental units:

- 1) No rental unit dwelling shall be weatherized without first obtaining a written permission of the owner or the owner's authorized representative.
- 2) Rents shall not be raised because of the increased value of dwelling unit due solely to weatherization assistance provided.
- 3) No undue or excessive enhancement shall occur to the value of the dwelling unit.
- 4) The benefits of weatherization assistance shall accrue primarily to the low income tenants.

The applicant must include the CF-6 Form "Owner Authorization for a Rental Dwelling Unit" as part of the Application package if the client the tenant. The form is divided in three sections. The first include the instruction and brief description of the program. In the description it is stated the mission of the program, the benefits that it brings to the owner or tenant of a dwelling and the possible weatherization measures that can be performed in the dwelling, such as replacements of A/C unit, water heaters, refrigerators, work that mitigates problems related to health and safety, etc. The second part is the "owner's commitment " that certifies the following: 1) not to increase the rent of the weatherized units for a period of two years for reasons related only to weatherized units. Increase in rent due to an increase in expenses and other improvements not related to weatherization are permitted; 2) not to initiate a process of eviction of the tenant for reasons related only to the weatherization of the unit. Eviction of tenant for violation of lease is permitted; 3) that this is the first time that weatherization of the dwelling is requested. The third part of the form is the authorization for weatherization personnel to access and enter the residence. This form is signed by the owner of the property as a mandatory requirement for granting of funds.

For any complaint, tenants will follow Act 38-2017, commonly known as "Act of Uniform Administrative Procedure of the Government of Puerto Rico", procedures.

Multifamily Buildings:

For a building to be considered a Multi-family unit for the purposes of WAP, it:

1. Shall contain more than one rented dwelling unit
2. Shall be owned by a single owner, business entity, or government agency that rents out all the units in the building
3. Includes duplexes/townhouses, row houses, walk-up and high-rise apartment buildings

Under the definition, buildings in which units are owned separately and represented by a condominium or neighborhood association are not considered multi-family buildings for the purposes of WAP.

The grantee may weatherize all the dwelling units and common areas of buildings that contain the following percentages of dwelling units eligible for weatherization assistance:

Dwelling Units in Building	Percentage (%) of Eligible Units Required*
Two (2) to Four (4) (includes duplexes)	50% or more
More than Four (4)	66% or more

* Percentage may include vacant apartments that will become eligible dwelling units within 180 days under a Federal, State, or local government program for rehabilitating the building or making similar improvements to the building. That is, all designated-eligible vacant apartments will be occupied within 180 days from the completion of the work by eligible clients.

If the multifamily building is located in a complex, each building is to be considered separately when determining the percentage of eligible units.

If the above conditions are met, the common areas and all dwelling units of the building may be weatherized. The total value of the measures installed in the entire building (weatherized units and common areas) may not exceed the average per-unit investment multiplied times the number of eligible units.

For buildings owned by private individuals or private business entities, the grantee must attempt to obtain an investment from the owners of multi-family properties of not less than 25% of the total amount planned for expenditure on the building. If the building owner refuses to invest the minimum required amount, then weatherization of the common areas and dwelling units over the required threshold percent will not take place. Owner investment will not be required for buildings owned by state or local governments.

The common areas of a multi-family unit containing less than the required percentage of eligible dwelling units shall not be weatherized. However, individual dwelling units within the building may be weatherized, provided that the occupants and the dwelling qualify with the requirements established in this Master File, and that additional requirements for renter occupied units are also fulfilled.

Describe the Deferral Process

The client may meet the eligibility requirements but for other reasons the unit is not a good candidate for weatherization. Therefore, the unit may be deferred because of the following:

1. Condition of the structure (building integrity/inability to practically or effectively weatherize).
2. Area slated to be redeveloped (highway development, economic development, flood area).
3. Health and safety reasons that defer services such as infestation or mayor electrical deficiencies.
4. No communication or if by some reason the client could not be reached.

A letter will be sent to the client explaining the reasons of the deferral and suggestions of what the client needs to do in order for EPP to reconsider the weatherization of the unit.

In the cases of clients that could not be reached, a deadline for them to communicate with EPP will be established on the letter. If the client fails to communicate within the given time, the case will be close and another eligible person will be considered.

The following is more information on the Deferral Policy:

Deferral Policy:

EPP shall utilize the Weatherization Deferral/Referral Notice to provide written notice to clients in dwellings where problems exist that are outside the scope of Weatherization. Clients will be given 30 days, as stated on the Deferral Notice, to take corrective action. If the client is able to take corrective action within 30 days work should commence as soon as EPP receives notification from the client. If problems identified in the Deferral Notice are not corrected within 30 days, EPP places the job in an inactive file. The client can reapply when and if the problems noted on the Deferral Notice have been corrected. Deferral conditions may include:

- Building structure or its electrical system is in a state of disrepair and failure is imminent.
- Extensive moisture/mildew is severe and cannot be resolved under the existing health and safety measures.
- Improperly stored chemicals, combustible materials, or other fire hazards that present a danger to the occupants or the workers.
- Major remodeling is in progress, which limits the proper completion of major weatherization measures.
- Occupant has known health problems that prohibit the installation of weatherization materials.
- The client is hostile, uncooperative, abusive, threatening to the auditors, crews or staff that must work or visit the dwelling.
- The extent of the lead-based pain in the dwelling would potentially create further health and safety hazards.
- The presence of sewage or animal feces in the home will endanger the workers/crews and client if the weatherization work is performed.
- There is not adequate interior space to install hot water tank and exterior location is exposed to the elements. Cost of constructing an exterior shelter is beyond the scope of the program.
- Other

III.1.3 Definition of Children

Definition of children (below age): 6

III.1.4 Approach to Tribal Organizations

Eligible applicants are served without regard of race, color, age, sex, disability, national origin, or political and religion belief.

III.2 Selection of Areas to be Served

Since Puerto Rico climate does not exhibit significant variations between low elevations and mountain areas, the location of the houses to be weatherized is not considered as a factor in determining the distribution of units. The application process will be opened to all eligible residents of Puerto Rico.

III.3 Priorities for Service Delivery

As stated in the Weatherization Assistance Program Operational Manual, the WAP program will provide assistance to eligible persons who are elderly, persons with disabilities and families with children. Persons with a fixed rate in their electric bill will not qualify for the Program.

The fixed electric rate is a special tariff for helping low income residents of public buildings in Puerto Rico. This special tariff was created by Act 69-2009. The monthly payment mainly depends on the number of rooms in a dwelling and not on the electric energy consumption. Therefore, if the electrical consumption remains within a determined range any savings will not be reflected in their bills.

III.4 Climatic Conditions

The climate of Puerto Rico falls into the tropical climatic zone. Temperatures are moderate year round, with a range from 70 °F (21 °C) to 90 °F (32 °C) in the lower elevations, and between 60 °F (16 °C) and 80 °F (27 °C) in the mountains. Puerto Rico averages close to 4,500 cooling degree-days. The humidity runs continuously at around 80%. The Island is vulnerable to hurricanes, between the months of July through November. Last September, 2017 Puerto Rico was devastated by hurricanes Irma and María, Category 5 and 4, respectively. Puerto Rico is currently recovering from the passage of such hurricanes, while also entering into a new hurricane season. As a result of both, Hurricane Irma and Hurricane María, Puerto Rico was declared a disaster zone in its entirety by the President of the United States, Donald Trump; FEMA-4939, Puerto Rico Disaster Declaration (as of November 1st, 2017).

III.5 Type of Weatherization Work to Be Done

III.5.1 Technical Guides and Materials

Please refer to attachment "Extract_WAP-PR _Operational Manual_Sect.10" for information about the Programs Measures-Weatherization Measures.

All work will be performed in accordance to the DOE-approved energy audit procedures and 10 CFR 440 Appendix A.

III.5.2 Energy Audit Procedures

Audit Procedures and Dates Most Recently Approved by DOE.

Single-Family: Puerto Rico will use DOE approved spreadsheets in combination with the Puerto Rico Energy Audit Tool (PREAT) for single family audits. PREAT was developed by the then Puerto Rico, Weatherization Assistance Program (WAP) , currently known as DEDC's EPP. Puerto Rico intends to implement solar PV into the WAP program and per DOE WAP Memo 024 and WPN 19-4, we will follow the path for non-Appendix A technology approval. We will begin the process by first working with the DOE PO team to secure prior approval to proceed with a pilot solar PV project. If approved by DOE, we intend to work with NASCSP to develop a methodology for the pilot project that will include best practices for solar implementation. This will include a method for incorporating solar PV into our energy audit tool.

Manufactured Housing: Puerto Rico will use DOE approved spreadsheets in combination with PREAT.

Multi-Family: Puerto Rico will use DOE approved spreadsheets in combination with PREAT for multi-family.

Multi-Family:

Based on the Puerto Rico Weatherization Assistance Program Final Report for program years 2009-2012, the weatherized multi-family units represented only a 0.8% of the total weatherized units for the 2009-2012 period. Therefore, the State Plan includes the following approach to ensure that the eligible occupants of multi-family dwellings buildings receive appropriate and cost-effective weatherization services. a. Each unit within an eligible buildings complying with the WAP multi-family weatherization criteria will be audited based on DOE approved spreadsheet in combination with the PREAT. b. Common areas will be audited utilizing a separate PREAT audit form. c. Audit results obtained from all PREAT forms will be compiled with all weatherization cost added together to obtain the total weatherization cost for the building. As stated in section 5.4 of the PR WAP Operation Manual, the total value of the measures installed in the entire building (weatherized units and common areas) may not exceed the average per unit investment multiplied by the number of eligible units. d. Prior to the implementation of any weatherization measure at the multi-family building a report with all necessary documentation mentioned above will be submitted to the Project Officer for review and approval.

III.5.3 Final Inspection

As stated in 10 CFR 440.16(g), a dwelling unit may be reported completed as long as the grantee or its authorized representative, has performed a final inspection and certifies that the work has been completed in a workmanlike manner. The final inspection must be performed by a State certified inspector contracted by the grantee. The inspector shall not be affiliated with the contractor that performs the work. The signed inspection form certifies that measures installed should, under reasonable conditions, save energy and make the dwelling more comfortable for the inhabitants. If a designated measure is not installed, then a written explanation must be included in the file and noted on the inspection form.

During the monitoring process, approximately 5% of completed jobs will be inspected by the grantee to evaluate a sampling of work quality, work orders, and post work inspections. In addition, all summary sheets and reports outlining measures on each completed job will be reviewed and entered into a statewide database.

III.6 Weatherization Analysis of Effectiveness

Since the principal target of the WAP is to assist low-income families to reduce energy consumption, Grantee will continue with the utilization of the PREAT. With this tool the auditor can calculate the effect of weatherization measures in lowering the home monthly energy consumption in KW-Hr. The projected energy reduction would be compared with the actual energy reduction as show in monthly bill to determine the effectiveness of the weatherization works performed at each home. For comparison periods grantee would use billing energy information for a whole year (six months before and six months after weatherization measures are completed).

As a Direct Service Grantee, the EPP will compare average energy savings per weatherized homes of PY 2020 program to the previous savings obtained during the past 2009-2012 performance period of 1459.2 KW-H/year. Although Grantee recognizes that this year's program is not comparable in scale and scope (smaller quantity of units to be weatherized) with previous periods, the average energy reduction comparison would give an idea of the effectiveness of this year's program regarding the energy savings resulting from the implemented weatherization measures.

Training capabilities would be assessed mainly with the utilization of the Dwelling Unit –Works complete Summary Form EPPIF, used by the production monitors. In this form results for each weatherization measures are assessed for contractor workmanship, client satisfaction with each measure and health and safety observations, and overall client satisfaction with the weatherized works performed. Any deviation from WAP requirements resulting from such quality inspection would be utilized for continue refinement of training either by on the job training or special communications notices.

Continues improvement of WAP efficiency would be supported with the utilization of the custom-web-based program name Work Order management System (WOMS) or a similar program. This data base application provides access to all personnel involved in the WAP process (auditors, contractors, inspectors, technical coordinators and managers) to the Program's stored information. The centralized program would facilitate efficiency improvement in the report generation/data evaluation and project progress tracking.

III.7 Health and Safety

Refer to the H&S plan for Puerto Rico.

III.8 Program Management

III.8.1 Overview and Organization

The Puerto Rico Weatherization Assistance Program will be administered by the Department of Economic Developmen and Commerce's Energy Policy Program. As per Act 17-2018, the DEDC is a public entity of the Government of Puerto Rico (Puerto Rico).

The DEDC serves as one of the public agencies that oversees the development of the energy industry in Puerto Rico. As such, DEDC's EPP is responsible for promoting and implementing Puerto Rico's energy public policy in the various energy sectors, including government, industry, commerce and residential.

Among other services EPP provides are energy inspections, technical assessment, and education on energy efficiency and renewable energy.

The DEDC receives and manages State and Federal grants. Federal grants are managed using the State Plans approved by the award agency or through cooperative agreements and/or contracts agreements with grantees.

In respect to Puerto Rico's energy public policy, DEDC's EPP is responsible for the implementation of the following programs:

- Weatherization Assistance Program (WAP)
- State Energy Program (SEP)
- Green Energy Funds (GEP)
- Energy Performance Contracting Program

The Weatherization Assistance Program was created in 1976 to assist low-income families whom lacked resources to invest in energy efficiency. In PY 2009 Puerto Rico was included for the first time in the WAP; this is its eleventh year. The Program mission is to reduce energy costs, while ensuring the health and safety of eligible low-income families with priority for households with children, elderly and persons with disabilities. The Program is administered in Puerto Rico by the Department of Economic Development and Commerce, acting as the Grantee. The DEDC administers the WAP in compliance with applicable laws; including regulations contained in 10 CFR Part 440, 2 CFR Part 200, DOE WAP notices and other procedures applicable to these regulations as the United States Department of Energy (DOE) may prescribe for the administration of financial assistance. Program services will also be delivered by the DEDC's EPP. The Program services includes, but not limited to, identifying eligible customers, evaluating the dwelling units to be weatherized, training of personnel, installation of energy-saving measures, supervision of weatherization work, maintenance of customer files, and report drafting, among others.

III.8.2 Administrative Expenditure Limits

The DEDC will retain approximately 5.0% of the grant for their administrative costs.

III.8.3 Monitoring Activities

The EPP conducts comprehensive monitoring and oversight of its own operation, to assure compliance with its inherent responsibility as a direct service Grantee of federal funds under the Weatherization Assistance Program. The comprehensive monitoring would be performed by Grantee's staff or contractors not associated with the Program's daily operations of the program following the Monitoring Administration and Process section of DEDC's monitoring guide. This guide was created to provide a framework of monitoring activities for federal funds received and used by DEDC's in compliance with its inherent responsibilities as a federal pass-through entity with the understanding that its procedures and guidelines do not supersede the latest rules and regulations governing each specific program. Also, the EPP will follow the WPN 16-4:Updated Weatherization Assistance Program Monitoring Guidance.

Monitoring will consists of visits to assisted units and desk audits, where performance reports and other information will be reviewed. In-site monitoring will be done to identify methods, deficiencies, and

success in program operations and to assess technical assistance needs to develop appropriate training courses. The grantee field staff will perform periodic monitoring to determine operational effectiveness of the Program, including prioritization of weatherization measures, job costs, material standards, and verification that the completed work is reflected in the job files. In-site monitoring could also include, but will not be limited to, financial records, inventory, client files and work completed.

Administrative and Fiscal Monitoring

The EPP may choose between a member of the grantee staff or an independent contractors not associated with the daily operation of the Program to perform the monitoring. The employee or contractor may be chosen based on its technical knowledge of the Program but would not be associated with its daily operation. Furthermore, EPP staff cannot participate on the monitoring procedure in which the monitor or any member of his immediate family is a member of the board of Directors, official or employee or have other indirect interest in the organization or program to be monitored. Due to the scale of this year program only one on site audit review would be performed during this year's funding cycle. The on-site annual review will verify compliance with all program rules, energy audit procedures, crew operations, client interaction, and data collection and reporting.

Production Monitoring

- The grantee will contract external WAP previously certified inspectors to inspect 100% of the weatherized units. The Grantee's field staff will monitor 10% of the 100 % weatherized units inspected by the contracted field inspectors on a weekly basis. This 10% includes units in progress beyond the 5% of completed units in order to assess quality and compliance issues, materials, appropriateness and accuracy of energy audits etc as per weatherization program notice 16-4. The Grantee's field staff personnel utilized for the 10 % monitor inspections should not be associated with the daily operation of the WAP.

III.8.4 Training and Technical Assistance Approach and Activities

The Training and Technical Assistance (T&TA) Plan activities are intended to maintain or increase the efficiency, quality, and effectiveness of WAP at all levels. Nevertheless, because of insufficient funding for this year program and time limitations EPP is constrained in the certification of new technical personnel for the incoming weatherization program implementation. For that reason, EPP would contract auditors, inspector and contractors etc, that were already certified under the previous WAP program funding cycle. As such, only additional refresh training will be provided to those selected to ensure that required skills and knowledge are maintain to comply with the quality requirements of the weatherization program of all contracted personnel and staff employees. Refresh trainings will be held with different approaches and scope depending on the audience responsibilities within the program. A portion of the refresh training will cover aspects of the programs that have changed such as: rules, policies regulations, procedures, reports and new forms. Other potential training sections will be aimed to refresh technical aspects to the previous weatherization program certified personnel with emphasis in new health and safety issues in accordance with the Health and Safety Plan. In addition, these refresh training would reflect the lessons

learned from previous year's implementation and any DOE project Officer monitoring visits feedback, internal audits and grantee field monitoring findings etc.

Trainings will be performed before all weatherization work starts and will be mandatory to all Grantee's staff and contracted employees that will perform any work related to the weatherization program. Grantee staff employees or contractors that do not attend these training will not be allowed to participate in the weatherization program. Regarding the training activities to execute the grantee Health and Safety (H&S) plan, EPP is considering the contracting of a Safety and Industrial Hygiene and Environmental Consultant with broad industrial exposure to train all necessary personnel participating in the weatherization program in all aspects address by the H&S Plan. Client education will be performed during the audits visits by auditors including brochures as established in form AF-1 (Auditor Report). Furthermore, if as a result of project's monitoring repetitive deficiencies are observed, on the job training and /or special communications notices may be required or issue to address these situations.

NOTE:

The EPP will follow the *Tier 1 Training in the Territories - Training Provider Requirements* which states the following: *Relying on accredited training providers who are unfamiliar with the housing stock and specific WAP measures typical to the U.S. territories may not always be the best use of training time and money. Grantees in the U.S. territories may offer Tier 1 comprehensive trainings from non-accredited training providers if the training providers can meet the quality criteria required of accredited centers listed in "Tier 1 Training Checklist".*

III.9 Energy Crisis & Disaster Plan

In an Emergency Crisis, the EPP must follow the Department of Economic Development and Commerce Emergency Operational Plan: Multi Risk Plan (Plan Operacional de Emergencia: Plan Multiriesgo del Departamento de Desarrollo Económico y Comercio). This plan is currently under revision and waiting executive approval. The plan is been prepared in accordance to the established guides of the Department of Homeland Security and the Federal Emergency Management Agency FEMA, with the collaboration of the Puerto Rico Emergency Management Agency. The primary purpose of the plan is to protect life and property of risks and dangers to our population and/or employee in an emergency event. For this reason, as per Act 57-2014, commonly known as "Ley de Transformación y ALIVIO Energético de Puerto Rico", as amended by Act 17-2019, Act 211-1999 and Executive Order of June 25, 2001 (OE Administrative Bulletin No. 2001-26), the aforementioned emergency plan is in effect.

In the event of a crisis, many agencies participate in closed coordination to assist in such event. The Emergency Operation Centers (EOC's) is the location in which coordination of information and resources to support in the prompt solution of domestic incidents takes place. EPP is part of the emergency response group and therefore could provide technical assistance, recovery and clean-up efforts, crisis management and other assistance as required by the type of incident. DOE funding will not be used to pay for weatherization personnel to perform relief work in the community as a result of a crisis or emergency. As stated in the WPN 12-07, "[t]he use of DOE WAP funds is limited to eligible weatherization activities and the purchase and delivery of weatherization materials." Therefore, DOE funds used to address disaster related hazard will be limited to those established in the Weatherization Program Notice 12-07.

During the emergency, agencies will be required to report activities performed and shall coordinate their efforts with other disaster assistance programs, such as FEMA, in order to provide assistance to the community. The WAP Program Manager will submit to the DOE a report of activities performed or suspended during the emergency crisis. Only activities related to the WAP will be included in the report.

Eligible household located in the disaster area or that have been directly affected by the crisis, and with damages that could impact weatherization measure implementation and costs would be deferred until damages have been addressed. All works completed during disaster periods shall conform to the Puerto Rico Weatherization Program standards.

III.10 Budget

The following table shows the budget distribution for the Program:

DES CRIPTION	PROPOSED BUDGET
Grantee Administration	\$50,000.00
Training and Technical Assistance (T&TA)	\$272,364.00
Program Operations (PO)	\$965,088.00
Health and Safety (H&S)	\$91,825.00
Liability Insurance	\$0
TOTAL	\$1,379,277.00

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