

NEW HAMPSHIRE DEPARTMENT OF ENERGY

School Energy Efficiency Development (SEED) Grant Program

Solicitation for Written Comment

February 16, 2024

The United States Department of Energy's (USDOE) [State Energy Program](#) (SEP) has allocated a formula grant to states on an annual basis to encourage and facilitate state programs to enhance energy security, advance state-led energy initiatives, and increase energy affordability. In 2018, New Hampshire created the [School Energy Efficiency Development \(SEED\) Grant Program](#), a competitive matching grant program to help fund energy efficiency projects in public schools. The SEED Grant Program is administered by the New Hampshire Department of Energy (Department).

Background:

The SEED Grant Program provides funding to advance energy efficiency projects for public schools in small communities. These projects have a dual benefit in providing a safer, healthier learning environment for students and reducing a school's energy usage and operating costs to provide a direct financial benefit to school district budgets and local property taxpayers. The SEED Grant Program has awarded \$335,000 in funding since 2018 and has been successful in completing four energy efficiency projects for public schools in Hill, Lempster, New Boston, and Litchfield. Past awarded projects have successfully installed energy efficient lighting, insulation, and improved building controls.

Request for Comments:

The Department is requesting public comment in advance of the next SEED Grant Program's funding round (2024-2025) to assess how the SEED Grant Program is accomplishing its goals, and any suggestions for program improvement(s). This public comment solicitation is also meant to make public schools aware of the program, ensure potential applicants are informed of program expectations, and that each dollar spent makes a significant difference for small school districts and local communities.

Individuals are encouraged to review the Draft SEED Grant Program RFP and Draft SEED Grant Program Proposal Form before submitting written comment. Both the RFP and Proposal Form can be found here: [School Energy Efficiency Development \(SEED\) Grant Program | NH Department of Energy](#)

Submission Instructions:

- Please submit all written comments by 4:00 p.m. on March 19, 2024, via e-mail to griffin.j.roberge@energy.nh.gov with the subject line "SEED Grant Program Comments." All comments must be submitted in PDF format. Any written comments submitted after March 19, 2024, will still be accepted.
- All written comments submitted are subject to New Hampshire's 'Right to Know Law' RSA 91-A. Comments should not include any proprietary or confidential information.

Solicitation Framework:

The Department has provided a series of questions in which the Department is particularly interested in receiving feedback. This framework is intended as a guide, not as a limit on your comments. Please feel free to

comment on subject matters relating to the SEED Grant Program outside the confines of the questions below. There is no obligation or expectation to provide feedback on questions outside of your area(s) of interest or expertise.

The Department will hold a public stakeholder session on March 20, 2024, from 3:00 – 4:00 p.m. on Microsoft Teams. This call will summarize received comments and gives interested stakeholders an additional opportunity to provide feedback. The meeting will not be recorded. The Microsoft Teams invite is below:

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Funding Questions:

1. The Department intends to set a minimum grant amount of \$50,000. Is that a reasonable minimum grant amount to set for the upcoming funding round?

Programmatic Questions:

1. The Department has kept program eligibility capped at schools located in municipalities that have 10,000 or fewer residents. This has been done to target funds to smaller schools. Should the Department consider increasing this population requirement to allow larger schools to apply?
2. The Department intends to remove the retrofit or replacement of windows and doors from program eligibility to avoid federally required historical reviews and prioritize more cost-effective projects. Should the Department reconsider this removal?
3. The Department included in the SEED Grant Program RFP a “Recommended Project Design” section to help proposers avoid federally required environmental and historical reviews. Is this helpful or confusing for proposers? Why or why not?
4. Are there parts of the SEED Grant Program Proposal Form that could be improved or clarified?
5. Are there elements of the SEED Grant Program that should be discarded or overhauled entirely?
6. Are there aspects of the SEED Grant Program that the Department should consider to improve program participation or reduce administrative burden?

7. Are there ways the Department could better advertise the SEED Grant Program? Are there communication networks the Department should consider using?

Scoring Criteria Questions:

1. The SEED Grant Program currently awards both a lower match requirement and an additional 10 points to “disadvantaged” schools. Should the Department consider other approaches to spur participation from “disadvantaged” schools?
2. Does an additional ten points for being a “disadvantaged” school weigh too heavily in their favor? Are there other ways to prioritize funding to “disadvantaged” schools?
3. The Department currently identifies a school as “disadvantaged” based on one of two metrics – a school’s free/reduced lunch, or the USDOE’s [Energy Justice Mapping Tool](#). The Department has considered removing the free/reduced lunch metric and using the [Core Data Index Score](#) from the NH Community Development Finance Authority. The Index Score uses numerous indicators to assign a score to a municipality and could be helpful to meet the federal [Justice40 Initiative](#). Is the Core Data Index Score a good replacement to free/reduced lunch data?
4. Are there other metrics or tools that the Department should use to identify a “disadvantaged” school that use two or more of the following indicators: Low income, high and/or persistent poverty; racial and ethnic residential segregation, particularly where the segregation stems from discrimination by government entities; linguistic isolation; high housing cost burden and substandard housing; distressed neighborhoods; high transportation cost burden and/or low transportation access; disproportionate environmental stressor burden and high cumulative impacts; limited water and sanitation access and affordability; disproportionate impacts from climate change; high energy cost burden and low energy access; jobs lost through the energy transition; or access to healthcare?
5. Is the Letters of Community Support a meaningful scoring metric? Why or why not? If not, what scoring criteria should replace it, or where should these points be allocated instead?
6. Should the Department consider awarding points to public schools that are seeking SEED Grant Program funding to complete an energy efficiency measure identified in an energy audit?
7. Are there ways to prioritize schools that are multifunctional to the local community in the scoring criteria?
8. Should the SEED Grant Program award additional points to public schools that leverage funding from NHSaves? Is there a way to do so that do not disincentivize schools in municipal utility territory that cannot access NHSaves?
9. Are there ways the Department could make the scoring criteria more objective?
10. Are there other criteria that the Department should consider when reviewing applications? If so, how should the Department consider them in scoring and how heavily should the Department weigh them?