**Nez Perce Tribe CPRG Implementation Grant Budget Narrative – General Competition**

# Budget Detail and Reasonableness of Costs

# CPRG Project Administration for All Measures

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **CATEGORY** |  |  | **YEAR 1** | **YEAR 2** | **YEAR 3** | **YEAR 4** | **YEAR 5** | **TOTAL** |
| **Personnel** | **FTE** | **Salary** |  |  |  |  |  |  |
| Project Manager | 0.1000 | $97,573 | $9,758 | $9,758 | $9,758 | $9,758 | $9,758 | $48,790 |
| Administrative Assistant | 0.1000 | $58,365 | $5,837 | $5,837 | $5,837 | $5,837 | $5,837 | $29,185 |
| Technical Staff | 0.1000 | $62,691 | $6,270 | $6,270 | $6,270 | $6,270 | $6,270 | $31,350 |
| TOTAL PERSONNEL |  |  | $21,865 | $21,865 | $21,865 | $21,865 | $21,865 | $109,325 |
| **Fringe Benefits** | **Rate** |  |  |  |  |  |  |  |
| FICA & FICA-Med | 7.65% |  | $1,673 | $1,673 | $1,673 | $1,673 | $1,673 | $8,365 |
| SUTA (on first $53,500/FTE) | 0.821% |  | $132 | $132 | $132 | $132 | $132 | $660 |
| Workers’ Comp. | 3.00% |  | $656 | $656 | $656 | $656 | $656 | $3,280 |
| Retirement (401(k)match/yr/FTE) | $3,150 |  | $945 | $945 | $945 | $945 | $945 | $4,725 |
| Life Insurance (month/FTE) | $5.05 |  | $19 | $19 | $19 | $19 | $19 | $95 |
| Medical (per month/FTE) | $2,259.10 |  | $8,133 | $8,133 | $8,133 | $8,133 | $8,133 | $40,665 |
| EAP (per month/FTE) | $3.31 |  | $12 | $12 | $12 | $12 | $12 | $60 |
| TOTAL FRINGE BENEFITS |  |  | $11,570 | $11,570 | $11,570 | $11,570 | $11,570 | $57,850 |
| **TOTAL DIRECT** |  |  | **$33,435** | **$33,435** | **$33,435** | **$33,435** | **$33,435** | **$167,175** |
| **Indirect Costs** | **Rate** |  |  |  |  |  |  |  |
| FY24 approved IDC rate. | 20.89% |  | $6,985 | $6,985 | $6,985 | $6,985 | $6,985 | $34,925 |
| **TOTAL INDIRECT** |  |  | **$6,985** | **$6,985** | **$6,985** | **$6,985** | **$6,985** | **$34,925** |
| **TOTAL FUNDING** |  |  | **$40,420** | **$40,420** | **$40,420** | **$40,420** | **$40,420** | **$202,100** |

## Budget Categories and Budget Description

### Personnel

Project Manager: Total cost: $48,790.00 is 10% of Annual Salary. The Water Resources Division is going to administer the CPRG grant. Ken Clark, the Division Manager, will oversee grant compliance, ensure timely reporting, effective budget administration, and lead recruitment efforts for additional staff.

Technical Staff: Total Cost: $31,350.00 is 10% of Annual Salary. The Climate Change Coordinator, Stefanie Krantz, will assist with writing job descriptions, leading the community-based processes as part of her other duties, assisting with report writing, and GHG reduction reporting with Air Quality Division Staff.

Administrative Assistant: Total cost: $29,185 is 10% of an Annual Salary. The Water Resources Admin. Assistant will assist with processing finance paperwork, scheduling, coordinating tribal subcommittee agendas, ordering new equipment, and reimbursing costs for subcontractors.

### Fringe Benefits

Total Cost for Fringe Benefits is $57,850.00. This is for 10% of the time.

The Tribe’s fringe covers Medicare contributions, Idaho State Unemployment Taxes, Workmen’s compensation, a $3,000 per year 401K match with a $150.00 administrative fee, a standard $30,000 life insurance policy, medical insurance (medical, dental, and vision) for staff members, spouses, and dependents, and an Employee Assistance Program that offers free counseling, free legal, free debt counseling, and other mental health and wellness services. The fringe rates are charged to budgets in accordance with the percentage of salary per budget, as shown in the table. This detail will not be repeated for Measures 1, 2, or 3.

## Reasonableness of Cost for Administrative Costs

Administering the CPRG and completing the reporting requirements, Quality Control Requirements, and Subcontracting Requirements will require existing staff with expertise in administering EPA grants, tribal subcontracting, TERO requirements, and the tribal human resources rules. The time allotted will be for writing job descriptions, setting up new budgets, writing initial reports and editing reports, onboarding and training new staff, and helping new staff follow the rules of the program. In addition, the Project Manager will oversee timelines and deadlines, help new staff with challenges that may require budget modifications, and coordinate with EPA. Tribal staff who already know the Tribe’s programs, historical efforts, challenges, successes, unique culture, accounting structures, contracting structures, and climate change vulnerabilities will be invaluable for new staff just learning the ropes of working at the Tribe. We budgeted only 10% of the annual salaries of three current staff members, knowing that other staff would be helping participate in this as part of their routine duties, such as managing facilities, coordinating with tribal programs, and leading other programs.

# Measure 1: Built Environment – Residential Budget Detail

## Budget Categories and Budget Description

### Personnel



Three new personnel positions for the Nez Perce Tribal Housing Authority (NPTHA) for a total budget period cost of $914,009. New personnel will be hired and working full-time by the beginning of the third quarter.

Project Coordinator: Total cost: $346,977 for 4.5 years full-time (Annual Salary $77,106/year, Professional III). The Project Coordinator will supervise personnel, track all contractor activities and contracts, conduct budget administration, and complete reporting for grants.

Project Specialist: Total Cost: $297,932 for 4.5 years full-time (Annual Salary $66,207/year, Professional I). The Project Specialist will work directly with contractors and vendors, collaborate and coordinate to leverage opportunities and funding with federal/state partners, and develop and provide workforce training. Conduct home education and community engagement activities.

Project Administrative Assistant: Total cost: $59,800 for 4.5 years full-time (Annual Salary $59,800/year, Technician IV). The Project Administrative Assistant will assist with processing finance paperwork, scheduling, and coordination with households.

## Reasonableness of Cost for Measure 1 Personnel

Existing staff do not have the capacity to do the coordination, management, subcontracting, and planning required to implement 650 residential GHG reduction projects.

### Travel:



## Reasonableness of Cost for Measure 1 Travel

Travel allows for capacity and relationship building to implement GHG measures. Budget for two conferences/year split between personnel. Topic areas: energy, weatherization, residential wood smoke and wood heaters, tribal climate, and air quality. National conferences are often hosted in Eastern U.S. Airfare, hotel, and per diem are based on travel to New Orleans, LA as point of destination. Nearest airports are in Lewiston, Idaho (15 miles from Lapwai - Tribal HQ location) or Spokane Airport (120 miles from Lapwai). Spokane flights may cost less, but a hotel may be required for an early morning flight, and parking costs are higher than at Lewiston Airport. Parking is based on the possibility of a conference/workshop being held regionally or towards airport parking costs per year. For local travel, for Measure 1: 1,500 miles per year will be split between staff to visit homes, meet with local contractors, or attend project meetings. One project commute is 120 miles/roundtrip from Lapwai. Staff will be reimbursed for their personal vehicle use.



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| --- | --- |
| **Measure 1: Built Environment – Residential** | |
| **Budget Categories and Description** | **Reasonableness of Cost** |
| **Equipment - Not applicable** | **Not applicable** |
| **Supplies** |  |
| Project 1 – Energy Upgrade Supplies - $190,300: A cargo container will be purchased for its durability and resistance to vandalism. The container will store supplies for homes, including portable air cleaners and replacement filters. Bulk orders occur in Y1 and Y3. As described in Measure 1 narrative, weatherization activities reduce GHGs; however, can increase indoor pollutants, so air filtration is required and a community benefit. | The local current rate for a 20’ x 8’ cargo container is $4,300.  Y1 & Y3 purchases: 650 total of each: HEPA-filter portable air cleaner $150 each and 1 yr HEPA-filter replacement @$50 each. Based on March 2024 costs. |
| Project 2 - Wood Stove Upgrade Supplies- $13,150: Bulk orders for Burn Wise (best burn practice tools and supplies) for homes occur    in Y1 and Y3. These are standard supplies when conducting wood stove upgrades and assist with GHG reduction through occupant behavior change. | Y1 & Y3 purchases; 350 total of each tool: Stove thermometers @$25 each, Moisture meters @$40 each, Tarp & straps @$40, Carbon monoxide alarm @$30 each, Fire starters @$25 each. Based on historical cost. |
| Office Supplies – $1,000: Supplies purchased for the creation of three new personnel positions. Desks, computers, and office supplies. 1 laptop for travel and meetings will be shared among staff. | 3 desktop computers @$1,700 each; 1 Laptop computer @$1,700 each, 3 External hard drives @$150 each, 3 Workstations, chair, storage @$1,300 each. Miscellaneous office supplies @$200/year. Based on historical costs. |
| **Contractual** |  |
| Contractor to conduct energy audits for homes – $1,371,300 (65 homes in Y1, 147 homes in each Y2-Y5): Bid process for selection. Cost includes site visit, post-visit analysis, report w/ recommendations for GHG reduction measures. Avg cost of $2,100/home. | Based on recent project costs in the Oakridge Air Project in Oregon. These costs represent expected costs for the Nez Perce Reservation—$2,100 for evaluation and report. |
| Contractors for weatherization upgrades for homes - $7,836,000 (65 homes in Y1, 147 homes in each Y2-Y5):  Bid process for selection. Cost includes insulation, air sealing, door/window repair and replacements, ventilation, and installation to implement GHG reduction measures. Avg cost of $12,000/home. | Based on recent project costs in the Oakridge Air Project in Oregon. These costs are representative of expected costs for the Nez Perce Reservation. $12,000 for materials and installation; each home’s weatherization needs will be different. |
| Contract for air-source heat pump upgrade of homes of 650 homes - $4,571,000 (65 homes in Y1, 147 homes in each Y2-Y5): Bid process for selection. Cost includes the unit and installation to implement GHG reduction measures. Avg cost of $7,000/home. | Based on recent project costs in the Oakridge Air Project in Oregon. These costs are representative of expected costs for the Nez Perce Reservation. $7,000 for materials and installation. |
| Contracts for wood stove upgrade of 350 homes - $2,632,500 (65 homes in Y1, 147 homes in each Y2-Y5): Bid process for selection and work with nearby hearth retail stores. Cost includes cost of stove, chimney/venting pipe, hearth pad for safety, and installation costs plus minor roof/ceiling repair to implement GHG reduction measures.  Avg cost of $7,500/ home. | Based on recent project costs in the Oakridge Air Project in Oregon. These costs are representative of expected costs for the Nez Perce Reservation. Estimated $7,500 for materials and installation; each home’s wood stove upgrade will have different needs. |
| Contracts for Certified Building Inspector to inspect homes - $130,600 (65 homes in Y1, 147 homes in each Y2-Y5): Bid process for selection. County building inspections do not include tribal buildings. Tribe must pay for certified building inspectors to inspect work. Inspector will inspect weatherization upgrades and heating/cooling upgrades (GHG reduction measures). | Nez Perce Tribal Housing Authority spends an average of $200 per inspection of the work conducted in their tribal rentals. |
| Contracts for workforce training programs -$25,000 in YR1: Training and tribal capacity-building costs to implement GHG reduction measures for ten students (instructors’ prep-time, travel/per diem costs, instructional time, and follow-up; room rental; classroom instruction, hands-on training, curriculum, supplies, and mentorship program). Partner training organizations will provide six days of training on multiple training topics (audits, weatherization, wood stove installation). | Based on workforce training costs on radon gas mitigation held in September 2023 at $8,200 for a 2-day training (specifics to in the left column). Upscaled to allow for six days of training topics. |
| Contract for professional printing of outreach and educational materials for homes & public - $4,000 total/5 yrs:  Materials that cannot be printed in-house that require professional formatting and durable, quality materials. Local printing businesses will complete this task. | Based on printing costs for a radon outreach project with public libraries in January 2024. |
| **Other** |  |
| EPA Region 10 CAA 103 budget requirements have conference registrations in the “Other” category $7,500 total/5 yrs. Above section “Travel” describes the capacity-building possibilities needed to implement Measure 1 GHG reductions. Office copying and printing costs at the office support the implementation of Measure 1 GHG reductions - $1,750 total/5 yrs. | $1,500 conference registration covers costs/yr for 2 travels and copying/printing at $350/yr are based on historical costs. |
| **Indirect** |  |
| Nez Perce Tribe FY24 approved IDC rate is 20.89% - $349,168 total/5 yr. Base = direct costs less equipment, in-kind contributions, and pass-through funds. | The Tribe’s indirect cost rate is 30% less than that of area universities, and it parallels the indirect rate of local non-profits, not governments. $58,772 (Y1); $67,742 (Y2); $87,170(Y3); $67,742 (Y4 & Y5 each). Y1 amount accounts for mid-year staff onboarding and supply procurement. Y3 amount accounts for supply procurement (as described above. |

# Measure 2: Deploy Renewable Energy (Primarily Solar) at Tribal Facilities and Residences

## Budget Categories and Budget Description

Please see the budget table below for totals and the description beyond the budget table.



### Personnel

Two new personnel positions: Renewable Energy Manager and Coordinator. Total: $793.544.

Measure 2 creates two new personnel positions for Nez Perce Tribal Executive Direction. The first-year budget is at 50% time due to the expected timeline to recruit and onboard these new positions. FY 2 – 5 will be at 100% time.

Renewable Energy Manager I:(Annual Salary: $95,077) This budget accommodates a salary range from 36.96 Grade 24, Step 1 to 45.71 Grade 24, Step 9 for a Manager I Class Description. This new position at the Tribe would be the director of an Energy Division and responsible for supervising staff, overseeing subcontracting, reporting, and fully funding Measure 2. This would be the first formal energy coordinator position at the Tribe and is essential for coordinating efforts to build out Measure 2 fully.

Renewable Energy Coordinator Pro IV: *(*Annual Salary: $81,266.00). Budget range for Grade 21, Steps 1 to 9 ($31.71 to $39. 07) for a Pro. IV Class Description. This grade is allowed to supervise large contracts and coordinate large budgets with multiple deadlines. This staff person will be responsible for overseeing contracts and coordination.

### Travel

The budget allows for two conferences/workshops/per year split between personnel. Travel costs were budgeted based on the average costs to attend the DOE Tribal Energy Conference and National Tribal and Indigenous Climate Conferences, which occur every other year (2026, 2028) and usually involve a full week of travel, the National Congress of American Indian (NCAI) which occurs every year, and the Affiliated Tribes of Northwest Indians (ATNI) Tribal Climate Leaders Summit. ATNI and NCAI occur every year, but we assume that staff will alternate years or may choose to attend a tribal economic development conference instead. Reporting will include which conferences were selected and the outcomes of attendance.

### Equipment:

*Not Applicable*

### Supplies

Office Supplies – Supplies purchased for the creation of two new personnel positions. Desks, computers, and office supplies. 2 laptop for travel and meetings will be purchased for new staff members.

### Contractual

The standard rate for installed photovoltaic solar panels is just under $3.00 per kWh for rooftop arrays and $4.00 per kWh for ground mount or parking lot arrays. Projects the tribe has already installed averaged out to those rates, so we based our cost estimates on those rates. For the CRC, the rooftop and parking lot have the capacity to produce 182,500 and 2,920,000 kWh, respectively, annually, given our local irradiation factors. This would be 375 solar panels on the rooftop and 5,714 covering the parking lots. For the JFO, the rooftops could provide 24,100 kWh (105 panels), and the parking lot array could produce 36,000 kWh (132 panels).

Tesla Powerwalls to pair with residential solar on homes that need battery backup during wildfires, floods, and cold snaps. (60 installed each year over five years. Assumes average cost of $10,000/wall). Tesla does have cost savings for residential purchases for multiple Powerwalls but given how likely the demand is to increase for Powerwalls once CPRG funding is unleashed, we estimated the current cost installed for Powerwalls. Tesla Megapacks installed cost about two million dollars, and we have found Tesla’s speedy technological innovation to lead to dramatic changes in their battery technology that can either make it more, or less affordable so we included a realistic price for installed MegaPack XLs in 2024.

The Joseph Fisheries office will require a roof replacement to install the solar arrays, and upgrades to two electrical panels. The costs were based upon an online calculator for average roof replacement costs, and an assessment from a local electrical contracting firm that was completed for past proposals. The Tesla Powerwalls will be installed in three buildings, and connected to three different arrays, but only two panels require upgrades. This roof replacement will transition the buildings to metal, standing seam rooftops that are more fire resilient than the current roof materials, and assure that the rooftop endures for the lifetime of the solar arrays.

### Other

Tribal and local emergency managers have requested training specific to NEC and fire codes for solar pv arrays and batteries. We estimate that six personnel would take online courses from Solar Energy International.

In addition, most conference registrations cost approximately $500 per event, and we estimated 2 conferences per person per year. Staff will be housed in Enterprises office space without network printers. The printer lease fees are $300.00 per year.

### Indirect

Measure 2: $256,990 over five years, $32,818 in FY1; and $56,043 for FY 2- 5. Nez Perce Tribe FY24 approved IDC rate is 20.89%. Base = direct costs less equipment, in-kind contributions, and pass-through funds.

# Measure 3: Transportation; EV Charging Stations in Joseph, OR, and Kamiah, ID



Travel: Total of $720.00 YI and Y2: $270.00 in Y1 and $450 in year 2.

Local Mileage Reimbursement for existing maintenance staff: 403 miles (3 trips Kamiah) YR1 & 671 miles (3 trips to Joseph) YR2 at $0.67/mi GSA 2024 POV rate.

Equipment: Total of $61,000 in Year 2 for a Level III Charger Cost Estimate for the JFO.

Contractual:

The measure 3 contractual budget includes power supply upgrades for the JFO in Joseph, OR and the It’se Ye Ye Casino in Kamiah, Idaho. The power supply upgrade in based upon estimates provided by local electricians. The JFO upgrade would be combined with panel upgrades so it is less expensive than the Kamiah upgrade.

The Level II charges are based upon the installed prices of Tesla - Universal Wall Connector Level 2 Hardwired Electric Vehicle (EV) Charger – up to 48A). This would include running conduit from the new electrical panel underground to parking locations and mounting chargers on posts near the sidewalk.

# Reasonableness of Cost for Measures 2 and 3

### Personnel

All measures: Existing staff do not have the capacity to do the coordination, management, subcontracting, and planning required to implement two large solar projects, and all the associated subcontracting, hiring, oversight, and community-based coordination (Measure 2) involved for these projects. Also, the tribe has capacity issues that this funding could address that would magnify their efforts and make some of these efforts scalable. Measure 3 will be achieved with existing staff as Other Duties as Assigned.

### Travel:

Travel allows for capacity and relationship building to implement GHG measures. Budget for two conferences/year split between personnel. Topic areas: energy, weatherization, residential wood smoke and wood heaters, tribal climate, and air quality. National conferences are often hosted in Eastern U.S. Airfare, hotel, and per diem are based on travel to New Orleans, LA as point of destination. Nearest airports are in Lewiston, Idaho (15 miles from Lapwai - Tribal HQ location) or Spokane Airport (120 miles from Lapwai). Spokane flights may cost less, but a hotel may be required for an early morning flight, and parking costs are higher than at Lewiston Airport. Parking is based on the possibility of a conference/workshop being held regionally or towards airport parking costs per year. For local travel, one project commute is 120 miles/roundtrip from Lapwai. Staff will be reimbursed for their personal vehicle use. For Measure 2 mileage for local travel was estimated at 1,492 miles per year at $0.67/mi GSA 2024 POV rate. Since we will not be utilizing GSA vehicles for implementation, we expect to reimburse staff for personal vehicle use which will involve driving to area homes to evaluate rooftops and electrical panels for solar arrays and batteries. For Measure 3 we estimated only 3 trips per year for each year for Energy coordinator staff to visit Kamiah and Joseph, Oregon.

### Equipment:

Level III chargers cost from $24,000 to $200,000. We chose a mid-grade ChargePoint charger and averaged the cost based on several prices found through a google search and estimated the cost at $61,000. The investment in exorbitantly priced Tesla chargers did not seem worth it for this first project at JFO, and the charger will be similar to the ones installed at the CRC already, and the one to be installed in Kamiah, reducing the learning curve for troubleshooting.

### Supplies:

Costs of computers, laptops, external harddrives, workstations, and office supplies were based upon historical experience and comparison shopping online. The tribe has a minimalist office furniture style and usually purchases furniture and equipment that is low cost.

### Contractual:

We based the cost estimates for solar arrays on local industry averages and past experiences with installations at the Tribe. The costs usually come in right below $3.00 or $4.00 a kWh for installed rooftop and parking lot arrays, but we averaged up to an even $3.00 or $4.00 per hour to ensure that subcontractors can meet prevailing wage and Davis Bacon wage requirements. Most solar installers make about $3.00 less/hour than Davis Bacon Wage Requirements, but supplies are usually the highest cost for solar installations. There are likely to be some bulk cost savings in light of how large these projects are that could cut costs, and some extra costs associated with higher wages, so we think this estimate is accurate and fair for contractors. The installed cost of a Tesla Megapack XL was quoted at $2,000,000 which seemed comparable to information found through internet searches.

Battery storage (the MegaPacks and PowerWalls) hurt our GHG calculations because we were unable to pair the residential PowerWalls with the offsets associated with the solar arrays that they will be paired with. However, these arrays are so critical for the Tribe’s resiliency and will lead to savings that will be reinvested in more solar and storage projects, and the entire project as a whole will lead to greater GHG reductions than the amount that the CPRG will be funded. We hope the reviewer will understand that given more time, we would have shown a cost benefits analysis that reflected the added benefits from storage in terms of cost efficiency.

The parking lot solar arrays will benefit the CRC and JFO by lessening snow and ice removal costs, increasing shading near the buildings on hot days, and provided covered workspace for repairs to equipment in inclement weather or heatwaves, or shade for booths at tribal events and powwows. It will reduce the temperature inside automobiles potentially reducing the amount of fuel used for automotive air conditioning. The arrays will also offset additional power needed to power EV charging stations from the grid.

Quotes from local electricians were used for the costs of panel upgrades, step down transformers, and conduit upgrades for Measure 3. These costs seemed reasonable and comparable to each other. The Kamiah Level III charger installation is less expensive because the cost the cost of the ChargePoint station was covered otherwise.

### Other:

Online trainings were chosen for education to NEC and fire codes for solar pv arrays and batteries. We estimate that six personnel would take online courses from Solar Energy International. In addition, most conference registrations cost approximately $500 per event, and we estimated 2 conferences per person per year. Staff will be housed in Enterprises office space without network printers. The printer lease fees are $300.00 per year.

### Indirect:

Nez Perce Tribe FY24 approved IDC rate is 20.89%. Base = direct costs less equipment, in-kind contributions, and pass-through funds.  The Tribe’s indirect cost rate is less than half of local universities and parallels the indirect rate of local non-profits. Since most the funds will be in contractual, the total indirect is minimized.

### Expenditure of Awarded Funds

To ensure the efficient utilization of awarded funds, the Nez Perce Tribe's Water Resources Division Director will serve as the Project Manager for the grant. A robust oversight system has been established, supported by a dedicated administrative team, including the Grants and Contracts Coordinator, the Housing Director and Manager for Measure 1, and the Deputy Executive Director and Nez Perce Tribal Enterprises Executive Officer for Measures 2 and 3. Regular monthly meetings will be conducted to closely monitor the progress of grant objectives while also ensuring adherence to the project budget and that grant funds are expended in a timely and efficient manner during the grant period.

Commitment to financial transparency and accountability is demonstrated through strict adherence to the Finance Manual of Tribal Government Policies and Procedures. This manual provides standardized guidelines for financial management activities, ensuring consistency and accuracy in financial reporting. By following these procedures, the Tribe will facilitate the efficient processing of financial transactions, enabling timely reporting of financial outcomes. This meticulous approach empowers management to strategically allocate resources and achieve the Tribe's objectives while complying with all governing regulations.

Moreover, the management team's track record of successful grant management and financial stewardship positions it well to utilize awarded funds effectively. Previous projects have been executed with diligence and fiscal responsibility, resulting in the timely completion of objectives and the achievement of desired outcomes. Additionally, the team's collective expertise and experience in project management, financial administration, and regulatory compliance further enhance their capacity to navigate the complexities of grant expenditure.

**Note: Funds disbursed under the CPRG are subject to Davis Bacon Prevailing Wage requirements as explained in Section VI.C and to Build America, Buy America (BABA) as explained in Section VI.D.**