

**CPRG IMPLEMENTATION GRANTS COMPETITION**  
**BUDGET NARRATIVE FOR**  
**Resilient Rapid City: City and Community Partnership Efforts for Reducing GHG Emissions**

**Overview**

The City of Rapid City is respectfully requesting \$48,075,605 in CPRG implementation grant funding to cover costs related to personnel, fringe benefits, travel, supplies, contractual, subawards, printing, rentals, and indirect charges for eight GHG reduction measures. Below is a table that summarizes the budget by year, followed by a second table that shows the budget by GHG reduction measure. For a further breakdown of costs per GHG reduction measure, please refer to the Budget Detail section below and the attached Budget Spreadsheet.

Category	Year 1	Year 2	Year 3	Year 4	Year 5	TOTAL
<b>Personnel</b>	\$211,500	\$279,960	\$309,366	\$261,149	\$216,238	\$1,278,213
<b>Fringe Benefits</b>	\$50,760	\$67,190	\$74,248	\$62,676	\$51,897	\$306,771
<b>Travel</b>	\$735	\$735	\$735	\$735	\$735	\$3,675
<b>Equipment</b>	\$0	\$0	\$0	\$0	\$0	\$0
<b>Supplies</b>	\$1,130,000	\$1,000	\$1,121,000	\$1,000	\$1,000	\$2,254,000
<b>Contractual</b>	\$2,999,556	\$4,860,239	\$7,868,099	\$1,377,586	\$553,650	\$17,659,130
<b>Other</b>	\$1,225,272	\$4,677,748	\$9,345,195	\$8,954,197	\$200,750	\$24,403,162
<b>TOTAL DIRECT</b>	<b>\$5,617,823</b>	<b>\$9,886,873</b>	<b>\$18,718,643</b>	<b>\$10,657,342</b>	<b>\$1,024,270</b>	<b>\$45,904,951</b>
<b>TOTAL INDIRECT</b>	<b>\$442,480</b>	<b>\$526,637</b>	<b>\$943,903</b>	<b>\$174,373</b>	<b>\$83,260</b>	<b>\$2,170,654</b>
<b>TOTAL FUNDING</b>	<b>\$6,060,303</b>	<b>\$10,413,510</b>	<b>\$19,662,547</b>	<b>\$10,831,715</b>	<b>\$1,107,530</b>	<b>\$48,075,605</b>

GHG Reduction Measure	Total Cost	% of Total
Project Administration	\$1,164,299	2%
City-Owned Building and Facility Retrofits	\$2,392,500	5%
City-Wide LED Lighting Conversion	\$14,903,965	31%
School Weatherization	\$19,934,962	42%
Non-Profit Organization Energy Efficiency	\$1,120,750	2%
Water District Net Zero/Low Energy Study	\$594,700	1%
City Water Reclamation Facility Solar PV Pilot	\$1,417,632	3%
SD Mines Solar Pilot	\$2,803,750	6%
Solid Waste Methane Gas Conversion	\$3,743,047	8%
<b>TOTAL</b>	<b>\$48,075,605</b>	<b>100%</b>

## Budget Detail

Below is an explanation of each GHG reduction measure's budget, with details regarding how every budget item/cost relates to the project narrative and specific emission reduction activities, as well as how budgetary figures were estimated and reasonableness of costs considered. The charts for each GHG reduction measure demonstrate the tasks and activities planned over the five-year grant period to demonstrate during which years funds will be distributed.

### 1. Project Administration

Project Timeline	2024	2025				2026				2027				2028				2029			
	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Grant Award/Obligation	\$																				
Project Administration																					
Hire grant manager																					
Hire administrative assistant																					
Preparation of subaward agreements																					
Oversight of non-profit organization subaward competition																					
Management of city-owned facility energy efficiency retrofits																					
Management of subawards																					
Submit semi-annual reports																					
Submit final report																					

#### Personnel - \$815,345

To manage this grant, the City of Rapid City will hire two full-time (100% FTE) positions: a grant manager and an administrative assistant. The grant manager will be the primary position responsible for ensuring that all departments complete necessary tasks and all sub-awardees meet the requirements of implementing their subawards. This position will spend a significant portion of their time leading the City-Owned Building and Facility Retrofits project and the Non-Profit Organization Energy Efficiency project, but will also help to coordinate and monitor all GHG reduction measures throughout the grant period. The administrative assistant will provide support related to progress tracking, invoicing, and ensuring compliance with the Davis-Bacon Act, in addition to other direct project administration tasks. The City's current Sustainability and Stewardship Program Development Manager (Sustainability Program Manager) will provide overall project oversight and grant administration, starting at 15% FTE and increasing to 75-100% FTE over the five-year grant period, balanced with the duties of administering the planning phase of CPRG and other duties. The Sustainability Program Manager and grant manager will conduct public engagement activities.

A 4% cost of living increase has been included for each year of the grant for all City personnel.

#### Fringe Benefits - \$195,683

Fringe benefits have been calculated as 24% of the total personnel costs. This standard amount accounts for monies allocated to health insurance, Medicare, retirement, and Social Security.

#### Travel - \$3,675

Throughout the grant period, the Sustainability Program Manager, grant manager, and administrative assistant will travel locally to meet with project partners (sub-awardees), perform community engagement, conduct Davis-Bacon Act worker interviews, and monitor project progress. To cover mileage, a portion of the Project Administration budget accounts for these related travel expenses.

## Resilient Rapid City: City and Community Partnership Efforts for Reducing GHG Emissions

Mileage is calculated according to the state rate of \$0.51 per mile, and an estimated 120 miles traveled per month.

### Supplies - \$14,000

The City of Rapid City is requesting funding for office furniture, laptops and monitors, office supplies, and program supplies for the newly-hired grant manager and administrative assistant.

### Contractual - \$25,000

A contractor will be hired for Years 2-5 to assist with GHG reduction calculations for semi-annual and final reporting. The costs are broken down as \$5,000 for Years 2-4 and \$10,000 for Year 5.

### Other - \$4,750

The City of Rapid City is requesting funding to print materials for public outreach, meetings, etc. throughout the grant period.

## 2. City-Owned Building and Facility Retrofits

Project Timeline	2024	2025				2026				2027				2028				2029			
	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
<b>GHG Measure - City-Owned Building &amp; Facility Retrofits</b>																					
Project planning phase																					
Release RFP for consultant to conduct energy assessments																					
Select qualified consultant																					
Consultant conducts data collection and performs energy assessments																					
Create municipal building retrofit plan and prioritize buildings																					
Develop bid documents for identified improvements																					
Advertise bid proposals for contractors																					
Award bids to qualified contractors																					
Install energy efficiency improvements																					
Complete comprehensive study report																					
Determine outputs/outcomes achieved and costs of the GHG measure																					

### Personnel and Fringe Benefits

The personnel who will manage and implement this GHG reduction measure are included under the Project Administration budget portion described above.

### Contractual - \$2,175,000

A consultant will be hired to perform 10 energy assessments at City-owned buildings and facilities. The cost of \$175,000 is calculated based on an estimate of \$0.50 per square foot and a total of 350,000 square feet.

A contractor, or contractors, will be procured to complete up to 10 energy efficiency retrofit projects. Upgrades will include upgrading and installing HVAC systems, windows, insulation, heat pumps, etc. The total cost of \$2,000,000 assumes an average cost of \$200,000 per building retrofit. The City's Sustainability Program Manager researched current building retrofit plans and projects to determine a reasonable cost estimate for this GHG measure.

### 3. City-Wide LED Lighting Conversion

Project Timeline	2024				2025				2026				2027				2028				2029			
	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4			
<b>GHG Measure - The Monument LED Lighting Conversion</b>																								
Project planning phase																								
Issue RFP for lighting control provider and installer																								
Interview and select lighting control provider and installer																								
Advertise bid proposals for electrical infrastructure repair work																								
Advertise bid proposals for Phase 1 light fixtures and installers																								
Award bids to qualified contractors for electrical infrastructure repair work and Phase 1																								
Conduct on-site work for Phase 1 lighting controls and infrastructure repairs																								
Advertise bid proposals for Phase 2 light fixtures and installers																								
Award bid to qualified contractor for Phase 2																								
Conduct on-site work for Phase 2																								
Advertise bid proposals for Phase 3 light fixtures and installers																								
Award bid to qualified contractor for Phase 3																								
Conduct on-site work for Phase 3																								
Complete final report																								
Determine outputs/outcomes achieved and costs of the GHG measure																								
Project Timeline	2024				2025				2026				2027				2028				2029			
	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4			
<b>GHG Measure - City-Wide LED Street Light Conversion</b>																								
Project planning phase																								
Advertise bid proposals for 1,600 LED street lights																								
Award bid to qualified street light supplier																								
Advertise bid proposals for contractor to install 640 street lights and electrical service work																								
Award bid to qualified contractor for installation of street lights and electrical service work																								
Install 3,200 LED street lights																								
Upgrade electrical services (as needed throughout project duration)																								
Complete final report																								
Determine outputs/outcomes achieved and costs of the GHG measure																								
Project Timeline	2024				2025				2026				2027				2028				2029			
	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4			
<b>GHG Measure - Parks &amp; Recreation Sports Fields LED Lighting Conversion</b>																								
Project design phase																								
Advertise bid proposal for LED lighting supplier and contractor																								
Award bid to qualified supplier and contractor																								
Order LED light fixtures and related equipment																								
Install LED light fixtures and conduct related electrical upgrades (weather permitting)																								
Complete final report																								
Determine outputs/outcomes achieved and costs of the GHG measure																								

#### Personnel - \$292,507

In addition to the Sustainability Program Manager, grant manager, and administrative assistant, other existing City personnel will be designating a portion of their time to complete work directly related to implementing this GHG reduction measure:

- Engineering Manager for The Monument, .1 FTE
- Electrician for The Monument, .25-.5 FTE
- Tradesperson for The Monument, .25-.5 FTE
- Traffic Engineer for Public Works, .1 FTE
- Project Manager for Parks & Recreation, .1 FTE

A 4% cost of living increase has been included for each year of the grant for all City personnel.

#### Fringe Benefits - \$70,202

Fringe benefits have been calculated as 24% of the total personnel costs. This standard amount accounts for monies allocated to health insurance, Medicare, retirement, and Social Security.

### Supplies - \$2,240,000

The City's Public Works Department/Traffic Operations Division will be purchasing the light fixtures required to complete city street lighting upgrades. The costs, split between Years 1 and 3 of the grant periods, assumes 3,200 fixtures at \$700 each. The City's Traffic Engineer researched current pricing and contacted local suppliers to determine a reasonable average cost per fixture.

### Contractual - \$10,871,350

A contractor will be procured to install facility-wide LED lighting upgrades at The Monument, divided among three phases over the course of the grant period. Estimated costs cover \$249,230 in professional services; \$3,355,426 for LED lighting fixtures, controls, and related materials; and \$585,394 for labor costs related to installation of the lighting, controls, and related equipment, and associated electrical work. The Monument's Engineering Manager composed a list of lighting fixtures needing to be upgraded throughout the building and checked current pricing to determine reasonable cost estimates for both purchasing and installing the fixtures.

A contractor will be procured to install LED city street lighting and complete electrical work. Estimated costs cover installation labor costs (estimated at \$200 per light based on current pricing) for a total of \$640,000 and an additional \$100,000 in electrical work for service upgrades as needed throughout the project duration.

A contractor will be procured to replace lighting at 27 City-owned sports fields throughout the grant period. Costs are estimated at \$4,473,200 for the purchasing of new LED lighting fixtures and related equipment and \$1,468,100 for labor related to installation and electrical upgrades. The Parks & Recreation's Landscape Architect contacted a contractor that specializes in sports field lighting to obtain cost estimates for the sports fields' various lighting needs.

### Other - \$75,000

The City of Rapid City is requesting funding to cover the cost of renting a lift, crane, and scaffolding to complete the LED lighting conversion project at The Monument.

## 4. School Weatherization

Project Timeline	2024	2025				2026				2027				2028				2029			
	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
<b>GHG Measure - North Middle School Weatherization</b>																					
Establish subaward agreement with RCAS																					
Project design phase for all geothermal system and HVAC project components																					
RCAS advertises for bid proposals for geothermal system and HVAC project components																					
RCAS awards bids to qualified contractors for geothermal system and HVAC project components																					
Installation of geothermal system and related construction																					
Installation of HVAC and temperature controls																					
Installation of electrical service and associated HVAC connections																					
Project design phase for LED lighting and controls upgrades																					
RCAS advertises for bid proposals for LED lighting and controls project																					
RCAS awards bid to qualified contractor for LED lighting and controls project																					
Installation of new LED lighting and controls upgrades																					
RCAS submits quarterly progress reports																					
RCAS completes final subaward report and shares results																					
Determine outputs/outcomes achieved and costs of the GHG measure																					

### Personnel and Fringe Benefits

The personnel who will manage and guide the implementation of this GHG reduction measure are included under the Project Administration budget portion described above.

### Other - \$19,929,962

The City of Rapid City will give a subaward in the amount of \$17,377,917 to Rapid City Area Schools (RCAS) to install a geothermal exchange system and upgrade the HVAC system at North Middle School. The subaward includes the costs to hire a contractor who will design (\$137,580) and install (\$2,501,444) the geothermal system, design (\$738,647) and install (\$13,429,932) the HVAC system, and design and install electrical service and associated connections (includes supplies and labor costs) (\$570,314).

The City of Rapid City will also give a subaward in the amount of \$2,552,045 to RCAS to complete LED lighting upgrades at North Middle School. The subaward includes the costs to hire a contractor(s) to design the lighting and controls project (\$133,045) and install the LED lighting and controls (\$2,419,000).

In preparing the amounts for the subawards, the City's Sustainability Program Manager met with RCAS staff and elected officials to discuss the scope of the project. The Construction and Planning Manager and Chief Financial and Operations Officer for RCAS worked with a local engineering firm to prepare reasonable cost estimates for this GHG reduction measure.

## **5. Non-Profit Organization Energy Efficiency**

Project Timeline	2024		2025				2026				2027				2028				2029			
	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	
GHG Measure - Non-Profit Organization Energy Efficiency Improvements																						
Project planning phase																						
Open subaward competition applications for local non-profit organizations																						
Review and selection of non-profit organizations subawards																						
Establish subaward agreements with non-profit organizations																						
Release RFP for consultant to conduct energy assessments for selected non-profit organizations																						
Select qualified consultant for energy assessments																						
Consultant conducts data collection and performs energy assessments																						
Energy efficiency improvements prioritized based on energy assessments																						
Non-profit organizations request quotes or advertise bid proposals for improvements																						
Non-profit organizations select qualified contractors and suppliers																						
Non-profits organizations install energy efficiency improvements																						
Non-profits submit quarterly progress reports																						
Non-profits complete final subaward report																						
Determine outputs/outcomes achieved and costs of the GHG measure																						

### Personnel and Fringe Benefits

The personnel who will manage and guide the implementation of this GHG reduction measure are included under the Project Administration budget portion described above.

### Contractual - \$107,500

A consultant will be procured to perform energy assessments at five local non-profit organization buildings. The cost assumes \$0.50 per square foot and an estimated 215,000 square feet total.

Other - \$1,000,000

The City of Rapid City will award subawards to five local non-profit organizations to conduct energy efficiency improvements (HVAC systems, windows, insulation, heat pumps, etc.). The cost is estimated at \$200,000 per non-profit and will include the cost of hiring contractors to complete the installations.

## 6. Water District Net Zero/Low Energy Study

Project Timeline	2024	2025				2026				2027				2028				2029			
	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
<b>GHG Measure - Water District Net Zero/Low Energy Study</b>																					
Establish subaward agreement with WDRWS																					
WDRWS releases RFP for consultant																					
WDRWS hires consultant																					
Evaluate West Central Electric Coop traditional power supplies																					
Evaluate West River Electric Coop traditional power supplies																					
Evaluate Western Area Power Authority power supply																					
Evaluate net zero/low carbon power sources																					
Prepare study deliverables (report)																					
WDRWS submits quarterly progress reports																					
WDRWS shares study findings and conducts public outreach																					
WDRWS completes final subaward report																					
Determine outputs/outcomes achieved and costs of the GHG measure																					

### Personnel and Fringe Benefits

The personnel who will manage and guide the implementation of this GHG reduction measure are included under the Project Administration budget portion described above.

Other - \$592,200

The City of Rapid City will award a subaward in the amount of \$592,200 to Western Dakota Regional Water System (WDRWS) to complete a net zero/low energy study for a future water distribution pipeline project. The subaward will include costs to hire a consultant who will evaluate traditional power supplies (\$97,800), Western Area Power Authority's supply (\$137,500), and net zero/low energy power sources (\$290,800), and will also prepare deliverables and conduct public outreach (\$66,100).

In preparing the amounts for the subaward, the City's Sustainability Program Manager met with WDRWS staff to discuss the scope of the project. The Executive Director of WDRWS worked with an engineering consultant to prepare a reasonable cost estimate for the work to be included in the study.

## 7. City Water Reclamation Facility Solar PV Pilot

Project Timeline	2024	2025				2026				2027				2028				2029			
	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
<b>GHG Measure - City Solar PV Pilot Project at Water Reclamation Facility</b>																					
Project planning and design phase																					
Release RFP for consultant to conduct feasibility and site assessment																					
Interview and select consultant for feasibility and site assessment																					
Completion of feasibility and site assessment																					
Advertise bid proposals for solar PV project																					
Award bid to qualified contractor for solar PV project																					
Construct solar PV project at Water Reclamation Facility																					
Complete staff operation and maintenance training																					
Contractor performs annual maintenance of solar PV project																					
Complete comprehensive study report																					
Determine outputs/outcomes achieved and costs of the GHG measure																					

## Resilient Rapid City: City and Community Partnership Efforts for Reducing GHG Emissions

### Personnel - \$92,320

In addition to the Sustainability Program Manager, grant manager, and administrative assistant, other existing City personnel will be designating a portion of their time to complete work directly related to implementing this GHG reduction measure:

- Public Works Engineer, .25 FTE
- Public Works Electrician, .1 FTE

A 4% cost of living increase has been included for each year of the grant for all City personnel.

### Fringe Benefits - \$22,157

Fringe benefits have been calculated as 24% of the total personnel costs. This standard amount accounts for monies allocated to health insurance, Medicare, retirement, and Social Security.

### Contractual - \$1,174,280

A contractor will be procured to install a 422-kW ground mount solar PV system at Rapid City's Water Reclamation Facility. Costs are estimated at \$24,000 to complete a feasibility and site assessment study, \$1,140,480 to install the solar project (includes costs for solar modules, racking, inverters, installation, and providing operations training), and \$9,800 for an operations and maintenance contract. The City's Sustainability Program Manager contacted a local company that specializes in solar PV systems to determine the appropriate sizing of the solar project and obtain a reasonable cost estimate for this GHG measure.

## 8. SD Mines Solar Pilot

Project Timeline	2024	2025				2026				2027				2028				2029			
	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
<b>GHG Measure - SD Mines Solar Pilot Projects</b>																					
Establish subaward agreement with SD Mines																					
Project planning and design phase																					
SD Mines advertises for bid proposals to install solar pilot projects																					
SD Mines awards bid to qualified contractor																					
Installation of rooftop solar pilot project on Placer Hall																					
Installation of rooftop and carport solar projects at Vanderboom Laboratory																					
SD Mines submits quarterly progress reports																					
SD Mines completes final subaward report																					
Determine outputs/outcomes achieved and costs of the GHG measure																					

### Personnel and Fringe Benefits

The personnel who will manage and guide the implementation of this GHG reduction measure are included under the Project Administration budget portion described above.

### Other - \$2,801,250

The City of Rapid City will award a subaward in the amount of \$2,801,250 to South Dakota School of Mines and Technology (SD Mines) to install a 50-kW rooftop solar project on a residence hall and a 375-kW rooftop/carport solar project on a laboratory building. The subaward includes costs for design and engineering support (\$150,000) and to hire a contractor who will install the two projects (\$1,850,000,



## Resilient Rapid City: City and Community Partnership Efforts for Reducing GHG Emissions

including PV solar modules, inverters, and labor costs). Additionally, the subaward will cover 35% in indirect costs that the university is required to charge (\$726,250).

In preparing the amounts for the subaward, the City's Sustainability Program Manager met with SD Mines staff to negotiate the indirect rate and discuss the scope of the projects. The Associate Vice President for Facilities, Risk, and Services as SD Mines prepared a cost estimate based on quotes from a local solar company and engineering firm for this GHG reduction measure.

### 9. Solid Waste Methane Gas Conversion

Project Timeline	2024	2025				2026				2027				2028				2029			
	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
<b>GHG Measure - Solid Waste Methane Gas Conversion</b>																					
Project planning and design phase																					
Advertise bid proposals for contractor to install methane gas conversion system																					
Award bid to qualified contractor																					
Construction of pipeline from landfill flare to Materials Recover Facility (MRF)																					
Installation of hot water boiler system and air handling unit at MRF																					
Complete final report																					
Determine outputs/outcomes achieved and costs of the GHG measure																					

#### Personnel - \$78,040

In addition to the Sustainability Program Manager, grant manager, and administrative assistant, other existing City personnel will be designating a portion of their time to complete work directly related to implementing this GHG reduction measure:

- Public Works Engineer, .25 FTE

A 4% cost of living increase has been included for each year of the grant for all City personnel.

#### Fringe Benefits - \$18,730

Fringe benefits have been calculated as 24% of the total personnel costs for salary. This standard amount accounts for monies allocated to health insurance, Medicare, retirement, and Social Security.

#### Contractual - \$3,306,000

A contractor will be procured to construct a landfill gas conversion system to utilize methane to heat the on-site Material Recovery Facility (MRF) at the Rapid City landfill. Costs are estimated at \$401,000 to construct approximately 1,300 feet of pipeline from the landfill's flare to the MRF, \$1,905,000 for the installation of a hot water boiler system and a gas moisture removal system at the MRF, and \$1,000,000 for the installation of an air handling unit and related electrical upgrades. The costs include associated materials and labor. The City's Sustainability Program Manager met with City staff who are knowledgeable of this project's scope and provided a current cost estimate from a local engineering firm for this GHG reduction measure.

**10. Indirect Costs - \$2,170,654**

Indirect charges have been calculated according to the standard 10% de minimus rate of the modified total direct costs, which includes all direct salaries and wages, fringe benefits, materials and supplies, contractual services, travel, and up to the first \$25,000 of each subaward. Indirect costs will cover financial management and general grant reporting and maintenance through Rapid City's Finance Department and Grants Division, as well as other work completed by staff of The Monument and Public Works and Parks & Recreation Departments, to offer further assistance to the general administration and management of the grant. The majority of indirect costs occur during Years 1-3 of the grant period, with the largest amount occurring during Year 3.