

United States Government

Department of Energy  
Bonneville Power Administration

# memorandum

DATE: 6/12/2025

REPLY TO  
ATTN OF: CP

SUBJECT: Bonneville Financial Assistance Instructions (BFAI) Interim Policy FY 25002

TO: Lynnial Trusty—NSS  
Bill Cochenour—NSSP

The purpose of this memorandum is to provide detailed guidance (referred to as the “Interim Policy”) to the Bonneville Financial Assistance Instructions (BFAI) regarding Bonneville’s revision of policy and clauses.

Effective Date and Applicability:

This Interim Policy is effective July 15, 2025, for all new awards and will remain in place until further notice or is superseded by a BFAI update. Contracting Officers should abide by all changes issued under this interim policy update. All applicable financial assistance awards issued after the effective date of this transmittal shall comply with the requirements of this update unless otherwise directed by the HCA.

Summary of Changes:

Part 4 - Closeouts – Updated language with closeout requirements to ensure consistent timelines.

Part 7- Clauses – Updated clause requirements for invoice submittals, cost reports and timelines, and remedies for noncompliance specific to closeout requirements for financial assistance awards.

- Clause 29 Reimbursement Requests;
- Clause 30 Advance Payment;
- Clause 31 Reimbursement Payment & Financial Reporting Requirements;
- Clause 32 Budget Changes; and,
- Clause 46 Closeout.

The conformed changes are presented below. Everything else remains unchanged.

Kelli Bowen  
Head of the Contracting Activity  
Bonneville Power Administration

cc:

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## **CLAUSE 29 REIMBURSEMENT REQUESTS (JULY 2025)**

(a) Only the Recipient may submit reimbursement requests to BPA. Subrecipients shall submit reimbursement requests to the Recipient, which is responsible for conveying reimbursement requests to BPA on behalf of subrecipients. Subrecipients may not submit reimbursement requests directly to BPA. The Recipient is required to submit reimbursement requests electronically through the IPP process (Invoice Processing Platform at <https://www.ipp.gov/vendors/faq-vendors>) or as articulated by the COR.

(b) The Recipient's submission of reimbursement requests should coincide with the Recipient's normal billing pattern. Reimbursement requests shall be made by the Recipient no later than every 30 calendar days. If reimbursement requests are received after the 30-day period, future awards may be paused at BPA's discretion. If Recipient fails to submit a request for reimbursement during any two consecutive months then the CO, in consultation with the COR and program office, may, per BFAI 4.338 (e), not issue further work as a result of noncompliance until Recipient submits invoices in arrears.

(c) Every reimbursement request submitted by the Recipient shall show the Federal share and the non-Federal cost share contribution for the invoice period, and the method by which the Recipient calculated the total Federal share and non-Federal cost share.

(d) The Recipient is required to provide BPA with additional supporting documentation verifying the Recipient's compliance with its cost sharing obligations.

## **CLAUSE 30 ADVANCE PAYMENT (JULY 2025)**

(a) Payments under this award shall be made by advance payment by electronic funds transfer (EFT). Recipient requests for advances and recipient financial reporting requirements shall be made as follows:

- (1) Advances. Advances for the anticipated needs of the project shall be made by the applicant upon submission of Standard Form 270, Request for Advance and Reimbursement, or CO-approved equivalent.
- (2) Generally, advances should be submitted not more frequently than monthly, and each request cannot be for more than 90 days cash requirements. An original and two copies should be submitted to the Contracting Officer's Representative (COR).
- (3) Interim Cost Reports. Interim Cost Reports shall be submitted to the COR quarterly, within 30 calendar days after the end of the reporting period.
- (4) Excess Funds. A prompt refund shall be made if excess funds are drawn. Exceptions are allowed when funds shall be disbursed within 7 calendar days or, if the excess is less than \$10,000 and shall be disbursed within 30 calendar days. Any interest earned on advance funds must be promptly refunded (except for State governments and instrumentalities and Tribes.)

## **CLAUSE 31 REIMBURSEMENT PAYMENT & FINANCIAL REPORTING REQUIREMENTS (JULY 2025)**

(a) Payment for services performed under this award shall be reimbursed by Vendor Express payment after performance of the services. Recipient requests for reimbursements, and recipient financial reporting requirements, shall be made as follows:

- (1) Reimbursements. Standard Form 270, Request for Advance and Reimbursement, or CO-approved equivalent, shall be used when requesting reimbursement for costs incurred on the project. Every request submitted shall show the Federal and non-Federal cost share (if applicable), unless written authorization is provided to report compliance of cost share obligations on an alternate basis. Requests shall be made monthly and shall be submitted

electronically through the IPP process (Invoice Processing Platform at <https://www.ipp.gov/vendors/faq-vendors>) or as articulated by the COR. Requests shall be accompanied by:

- (i) A summary of the approved budget, by line item, and cumulative expenditures by line item to date. Cost share shall be reported for the period of the request and cumulative to date.
  - (ii) Documentation to support payment and cost share obligations. Acceptable supporting documentation may include invoices on appropriate letterhead, time cards, travel vouchers, equipment purchase requisitions, printouts from internal financial systems, and indirect/unallowable cost justifications.
- (2) Interim Cost Reports. Interim cost reports shall be submitted to the Contracting Officer's Representative (COR) semi-annually at the six-month point after the date of award.
- (3) Final Cost Report. The final cost report shall be submitted to the COR within 120 calendar days after the end of the effective period. It shall be submitted in the same format as the budget as awarded. The final cost report shall compare the amounts allocated in the award budget to the amounts expended for each budget.
- (4) Final Invoice. The final invoice is due no later than 120 calendar days after the end date of the period of performance.
- (5) If Recipient fails to follow the outlined reporting cycle or submit a request for reimbursement during any two consecutive months then the CO, in consultation with the COR and program office, may, per BFAI 4.338 (e), not issue further work as a result of noncompliance until the Recipient submits invoices in arrears.

#### **CLAUSE 32 BUDGET CHANGES (JULY 2025)**

Any increase in the total project cost shall be approved in advance and in writing by the Contracting Officer.

#### **CLAUSE 46 CLOSEOUT (JULY 2025)**

(a) The Federal awarding agency or pass-through entity closes out the Federal award when it determines that all applicable administrative actions and all required work of the Federal award have been completed by the non-Federal entity. If the non-Federal entity fails to complete the requirements, the Federal awarding agency or pass-through entity proceeds to close out the Federal award with the information available. This section specifies the actions the non-Federal entity and Federal awarding agency or pass-through entity takes to complete this process at the end of the period of performance.

(b) The recipient submits, no later than 120 calendar days after the end date of the period of performance, the final invoice (or request for reimbursement) along with all financial, performance, and other reports as required by the terms and conditions of the Federal award. A subrecipient submits to the pass-through entity, no later than 90 calendar days (or an earlier date as agreed upon by the pass-through entity and subrecipient) after the end date of the period of performance, all financial, performance, and other reports as required by the terms and conditions of the Federal award. The Federal awarding agency or pass-through entity may approve extensions when requested and justified by the non-Federal entity, as applicable.

(c) Unless the Federal awarding agency or pass-through entity authorizes an extension, a non-Federal entity shall liquidate all financial obligations incurred under the Federal award no later than 120 calendar days after the end date of the period of performance as specified in the terms and conditions of the Federal award.

(d) The Federal awarding agency or pass-through entity makes prompt payments to the non-Federal entity for costs meeting the requirements in BFAI Part 5—Cost Principles under the Federal award being closed out.

(e) The non-Federal entity promptly refunds any balances of unobligated cash that the Federal awarding agency or pass-through entity paid in advance or paid and that are not authorized to be retained by the non-Federal entity for use in other projects. See OMB Circular A-129 and see BFAI 4.345 Collection of amounts due, for requirements regarding unreturned amounts that become delinquent debts.

(f) Consistent with the terms and conditions of the Federal award, the Federal awarding agency or pass-through entity makes a settlement for any upward or downward adjustments to the Federal share of costs after closeout reports are received.

(g) The non-Federal entity accounts for any real and personal property acquired with Federal funds or received from BPA in accordance with BFAI 4.310 Insurance coverage through BFAI 4.316 Property trust relationship and BFAI 4.329 Reporting on real property.

(h) When a recipient or subrecipient completes all closeout requirements, the Federal awarding agency or pass-through entity promptly completes all closeout actions for Federal awards. The Federal awarding agency makes every effort to complete closeout actions no later than one year after the end date of the period of performance unless otherwise directed by authorizing statutes. Closeout actions include Federal awarding agency actions in the grants management and payment systems.

(i) If the non-Federal entity does not submit their final invoice or request for reimbursement and all reports in accordance with this section and the terms and conditions of the Federal Award, then the Federal awarding agency proceeds to close out with the information available within one year of the end date of the period of performance.

(j) If the non-Federal entity does not submit all final invoices and reports in accordance with this section within one year of the end date of the period of performance, then additional requirements may be imposed upon the recipient or future financial assistance awards may be withheld, per BFAI 3.207 Specific conditions and BFAI 4.338 (e) Remedies for Noncompliance.

## **CLOSEOUT**

### **4.343 Closeout**

(a) BPA or the pass-through entity closes out the financial assistance award when it determines that all applicable administrative actions and all required work of the financial assistance award have been completed by the non-Federal entity. This section specifies the actions the non-Federal entity and BPA or the pass-through entity takes to complete this process at the end of the period of performance.

(b) The non-Federal entity submits, no later than 120 calendar days after the end date of the period of performance, the final invoice (or request for reimbursement) along with all financial, performance, and other reports as required by the terms and conditions of the financial assistance award. A subrecipient submits to the pass-through entity, no later than 90 calendar days (or an earlier date as agreed upon by the pass-through entity and subrecipient) after the end date of the period of performance, all financial, performance, and other reports as required by the terms and conditions of the Federal award. BPA or the pass-through entity may approve extensions when requested by the non-Federal entity.

(c) Unless BPA or the pass-through entity authorizes an extension, a non-Federal entity shall liquidate all obligations incurred under the financial assistance award no later than 120 calendar days after the end

date of the period of performance as specified in the terms and conditions of the financial assistance award.

(d) BPA or the pass-through entity makes prompt payments to the non-Federal entity for costs meeting the requirements in BFAI Part 5—Cost Principles under the Federal award being closed out.

(e) The non-Federal entity promptly refunds any balances of unobligated cash that BPA or the pass-through entity paid in advance or paid and that are not authorized to be retained by the non-Federal entity for use in other projects. See OMB Circular A-129 and see BFAI 4.345 Collection of amounts due, for requirements regarding unreturned amounts that become delinquent debts.

(f) Consistent with the terms and conditions of the financial assistance award, BPA or the pass-through entity makes a settlement for any upward or downward adjustments to the Federal share of costs after closeout reports are received.

(g) The non-Federal entity accounts for any real and personal property acquired with Federal funds or received from BPA in accordance with BFAI 4.310 Insurance coverage through BFAI 4.316 Property trust relationship and BFAI 4.329 Reporting on real property.

(h) BPA or the pass-through entity completes all closeout actions for financial assistance awards no later than one year after receipt and acceptance of all required final reports. The Federal awarding agency makes every effort to complete closeout actions no later than one year after the end date of the period of performance unless otherwise directed by authorizing statutes. Closeout actions include Federal awarding agency actions in the grants management and payment systems.

(i) If the non-Federal entity does not submit their final invoice or request for reimbursement and all reports in accordance with this section and the terms and conditions of the Federal Award, then the Federal awarding agency proceeds to close out with the information available within one year of the end date of the period of performance.

(j) If the non-Federal entity does not submit all final invoices and reports in accordance with this section within one year of the end date of the period of performance, then additional requirements may be imposed upon the recipient or future financial assistance awards may be withheld, per BFAI 3.207 Specific conditions and BFAI 4.338 (e) Remedies for Noncompliance.