

Federally owned property and other DOE reporting requirements

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Federally owned property reporting

Some Department of Energy (DOE) Grant recipient initial contracts included a requirement to track federal property acquired with grant funds of over \$5,000. This required the grant recipient to file an Annual Report on Federally Owned Property with the DOE in November of each year. This annual report will now only be required to be filed by grant recipients if the DOE actually purchased assets and then gave them to the grant recipient – an unlikely scenario.

Any assets purchased by grant recipients using grant funds are considered assets in which DOE has an interest. These will need to be reported to the DOE every two years under the revised regulations.

Baker Tilly recommends that grant recipients develop modifications to their asset tracking systems to identify assets funded by grant proceeds to ensure proper reporting to the DOE under these changing reporting requirements.

Vendors tab of S1512 report

Another area that caused confusion for some recipients was the use of the “Vendors” tab in the S1512 report. On the “Instructions” tab, it states that the “Vendors” tab is optional. This tab is actually required to be used per DOE. Vendors who have invoiced the recipient with over \$25,000 in charges should be reported on this tab. Those who have invoiced less than \$25,000 should be totaled on the “Prime Recipient” tab.

Standard labor rates

After discussion with DOE, it was determined that recipients who may use standard labor rates as part of their work order asset management systems or work order accounting process cannot use those standard rates for reporting purposes. Actual labor paid to employees should be used rather than the standard rates.

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Reporting requirements

The informational reporting requirements of grants received under the American Recovery and Reinvestment Act adds a layer of external federal reporting that may require grant recipients to modify their business processes to assemble data, ensure data integrity for reporting, and meet audit requirements.