

Interim Electrification Exception Process Instructions

Background

This document provides interim instructions for installations looking to submit a Department of the Air Force (DAF) electrification policy exception request. Follow-on implementing guidance will include specific documentation, justification package requirements, and templates for submitting an exception request. This interim exception process is subject to revision. Electrification is a requirement that will be incorporated into applicable DAF directive and non-directive publications.

Exemptions vs. Exceptions

Exemption: An indefinitely approved release from a criteria requirement. *The DAF “Electrification of Installations, Standard Building Operations, Flightlines, and Non-Tactical Vehicles (NTV)” memorandum outlines exemptions to the requirements that do not apply and therefore will not need a request for an exception. Documentation is required within project record.*

Exception: A situation where an alternative to the requirement may be permitted. *SAF/IEE may approve exceptions for unique and extenuating circumstances where electrification requirements do not safeguard facilities, mission, and/or personnel.*

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Submit exception requests through the functional chain. The Deputy Assistant Secretary of the Air Force for Environment, Safety and Infrastructure is the singular approval authority on behalf of the Department. Each organization involved in the exception request review process should also identify a designated authority (person/position) for coordinating a recommendation.

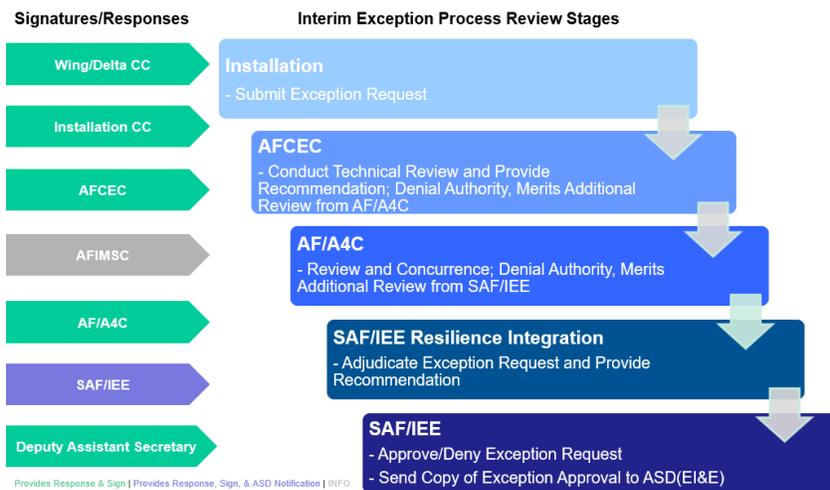


Figure 1. Interim Exception Process Steps

DAF Electrification Interim Exception Process Instructions

Figure 1 above shows the primary steps of the DAF electrification interim exception process. Exceptions will be reviewed on a case-by-case basis and limited for unique and extenuating circumstances. The Deputy Assistant Secretary of the Air Force for Environment, Safety, and Infrastructure (SAF/IEE) is pursuing a ‘no regrets’ investment approach for electrification, wherein higher operating costs associated with using all-electric technologies alone are not adequate reasoning to receive an exception. Any granted exceptions will be reviewed on a recurring basis as all-electric technologies and circumstances evolve.

The interim exception request process follows a functional command approach and should mirror the following steps as closely as possible.

Step 1: Installation Drafts Exception Request

- (a) Installations should first review the DAF electrification memorandum and supporting attachments to determine if their scenario merits an exemption (e.g., host nation requirement or agreement prohibits compliance) or exception.
 - a. If it does fall under an exemption, the installation will notify AFCEC. No further action is required.
 - b. If project merits an exception, proceed to the next step.
- (b) The installation Base Civil Engineer will work with AFCEC to prepare the necessary analysis and justification package for submitting an exception request.
 - a. At minimum, all exception requests will include the following:
 - i. Documentation that all practical electrification of covered systems has been implemented.
 - ii. A written analysis of alternatives assessed for any system for which an exception is requested, which includes an analytical comparison of the operational effectiveness, suitability, and life-cycle cost of alternatives that satisfy established capability needs.
 - iii. Identification of the design stage (e.g. 35% design), type, acquisition strategy, and timeline.
 - iv. An unclassified or CUI overview of any negative impacts of electrification of covered systems to mission assurance and why mitigating measures would better safeguard facilities, missions, and/or personnel.
 - b. AF/A4C in coordination with AFIMSC will develop implementing guidance (including updating business rules, playbooks, and compliance tracking) and template materials required to prepare an exception request.
- (c) Once the justification documentation package is complete and obtains installation or garrison commander coordination, submit the exception request to AFCEC workflow (afcec.workflow@us.af.mil).

Step 2: AFCEC Technical Review & Adjudication

- (a) AFCEC will conduct a technical review of the exception request materials provided by the installation, ensuring all necessary inputs are included and the analyses of alternatives and mission impact overview merit further review.
- (b) If AFCEC determines that an exception request does not meet the intent/requirements of the DAF electrification memorandum, then AFCEC may deny the exception request and return the package to the originator. AFCEC will record and track disposition of all packages.
- (c) If AFCEC determines that an exception request has merit, route the request to AF/A4C workflow (AF.A4.Workflow@us.af.mil) for further review.

Step 3: AF/A4C Technical Review & Adjudication

- (a) AF/A4C will conduct a technical review of the exception request materials.
- (b) If AF/A4C determines that an exception request does not meet the intent/requirements of the DAF electrification memorandum, then AF/A4C may deny the exception request and return the package to the originator, copying AFCEC to advise the installation of any next steps, as appropriate.
- (c) If AF/A4C determines that an exception request has merit, route the request to SAF/IEE Resilience Integration Directorate to obtain final disposition.

Step 4: SAF/IEE Adjudication

- (a) SAF/IEE Resilience Integration Directorate will review the exception request and recommendations from AFCEC and AF/A4C.
- (b) SAF/IEE Resilience Integration Directorate will provide a recommendation to the Deputy Assistant Secretary of the Air Force for Environment, Safety, and Infrastructure for approval or disapproval.
- (c) SAF/IEE Resilience Integration Directorate will document the decision and inform AF/A4C and AFCEC. AFCEC will advise the installation of any next steps, as appropriate.
- (d) SAF/IEE will notify the Assistant Secretary of Defense for Energy, Installations, and Environment (ASD(EI&E)) of approved exceptions and justification.