

MONMOUTH COUNTY PLANNING BOARD

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JOSEPH RETTAGLIATA
Chairman



ROBERT W. CLARK, P.P.
Director

January 26, 2010

Mr. Frank Norcross
EE-2K
U.S. Department of Energy
1000 Independence Ave., SW.
Washington, DC 20585-1290

Dear Mr. Norcross:

The Monmouth County Planning Board staff appreciates the opportunity to provide comments on the Department of Energy's proposed rule changes to reporting requirements for Energy Efficiency and Conservation Block Grant (EECBG) recipients. The Monmouth County Planning Board staff, as the coordinating agency for approximately \$4.2 million in formula EECBG funding granted to Monmouth County, would like to address its comments specifically to the proposal to require additional reporting to DOE on a monthly basis, in addition to the existing quarterly reporting requirements. The Monmouth County Planning Board staff believes that the imposition of a monthly reporting requirement for entities receiving over \$2 million in EECBG funding is unduly onerous and would not substantially improve the quantity or quality of information available to DOE.

The projects undertaken by Monmouth County with its EECBG funding are, for the most part, discrete projects which progress through the design phase and are then installed at one time (e.g., higher-efficiency boilers). Therefore, there is limited incremental progress to report on a monthly basis; the county already finds itself repeating material in successive quarterly reports because the time needed to fulfill DOE and other federal requirements, and to progress through the design phase, is measured in months rather than weeks.

Furthermore, a monthly reporting requirement would be a distraction from the task of actually using the EECBG funding. The same county personnel who are responsible for advancing EECBG-funded projects would instead end up devoting more of their time to reporting procedures – and, as a consequence, less time to actually advancing those same projects. As a result, the proposed monthly reporting requirement could actually delay the use of stimulus funds, and postpone their intended benefits of energy efficiency and job creation. Presumably the additional monthly reports would also need to be reviewed by DOE, where they would consume valuable personnel time as well, while yielding little in the way of results.

In summary, additional monthly reporting would yield little or no benefit and would consume resources which would be more effective if deployed to the task of implementing the proposed county projects. Therefore the Monmouth County Planning Board staff urges DOE to reject the proposed imposition of a monthly reporting requirement - in addition to the existing quarterly requirement - for EECBG recipients with over \$2 million in funding.

Sincerely,



Russel Like
Section Supervisor / EECBG Coordinator