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PETER AMAN COO

January 28, 2010

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

Subject: Comment for Federal Register Re: Changes to EECBG Reporting Requirements

Mr. Norcross:

I am taking this opportunity to comment on the suggested changes to the EECBG Reporting Requirements as Project Manager for the City of Atlanta's \$5.89mm EECBG formula award.

COMMENTS ON DRAFT EECBG REPORTING GUIDANCE

- 6.2.2b Monthly Reporting
 - o Rather than all recipients being liable to produce monthly reports, change the scope to *At the discretion of the Project Officer for Awards*
 - This will help fulfill the desire to identify where additional assistance may be needed as
 the added scrutiny should reveal weaknesses in targeted awards
 - This provides for a better use of Project Officer resources; to focus on problematic awards rather than having to review monthly reports from all awardees
 - O Change first monthly reporting deadline from March 20th, 2010 to 12-months following final award
 - Requiring an immediate shift to monthly reporting when final award has not been made only increases strain on limited administrative resources without achieving the proposed value of the increased reporting frequency.
 - A minimum 6-12 month grace period to ramp up programs and develop necessary procedures to meet quarterly and monthly reporting requirements across stakeholders. Without appropriate procedures in place, this will increase the need for administrative staff, which will likely be viewed in the public as "wasteful" spending
 - The City of Atlanta may be dealing with hundreds of sub-awards, so an immediate need for monthly reporting will **slow the disbursement of funds and associated job creation.**

Please feel free to contact me directly should you have any questions regarding these comments.

Sincerely,

Bill Hosken, Senior Project Manager City of Atlanta, Division of Sustainability bhosken@atlantaga.gov 404-330-6892