



City Of Raleigh
North Carolina

January 27, 2010

DOE Desk Officer, Office of Information and Regulatory Affairs,
Office of Management and Budget
New Executive Office Building
Room 10102
725 17th Street, NW
Washington, DC 20503

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

Re: Public Comments - DOE Proposed Monthly Reporting Requirements for EECBG Program
January 21, 2010 Federal Register

Thank you for this opportunity to provide comments to the referenced proposed changes. The City of Raleigh, North Carolina was awarded its EECBG # DE-EE0000768, on December 1, 2009. Herein is the City's response to the DOE request for comments on the proposed increased reporting requirements (new monthly reports in addition to the current quarterly reporting schedule).

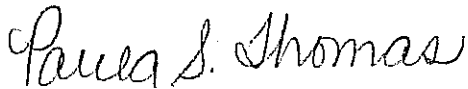
The City is strongly opposed to this proposed change. This additional administrative burden will drastically impede our ability to manage the projects, deliver the programmatic services and efficiently and successfully administer the grant. The additional time, effort and resources necessary to prepare this proposed extra reporting will drain our existing capacity and significantly interfere with our service delivery to our citizens.

While as stewards of public funds and a provider of public services, the City endorses and routinely practices transparent accountability and open public engagement, we endeavor to do so in as efficient and timely manner as possible. Similarly it is our understanding that the legislative intent of the EECBG program is to provide quick and effective means to stimulate the economy, reduce carbon emissions via energy efficiency and conservation projects/programs and create/retain jobs. It has been consistently conveyed to us as a grant recipient that timeliness of the delivery of these services is a key component of this program.

The proposed additional reporting requirements appear to us to be inconsistent with the intent of the legislation and counterproductive to those of us that are charged with implementing it. Local governments are pleased to be partners in this federal initiative, and see ourselves as the actual key on-the-ground folks that will make this a successful program. This program is a challenging and ever evolving effort and already has adequate if not somewhat onerous reporting requirements. We see no added value or benefit to the public from this new proposal – only additional, redundant, cumbersome and time consuming hurdles and barriers to delivering a very well intended and important federal program.

We urge you to consider these comments and withdraw these proposed additional reporting requirements.

Thank you for your serious consideration of these comments.

A handwritten signature in cursive script that reads "Paula S. Thomas".

Paula S. Thomas
Manager of the Office of Sustainability
City of Raleigh, North Carolina
(919-996-4658)

Cc: Mayor Charles Meeker
Senator Richard Burr
Senator Kay Hagan
Representative Bob Etheridge
Representative Brad Miller
Representative David Price
Russell Allen
Julian Prosser
Angel Wright-Feldman