



County of San Diego

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

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

Re: Public Comment - Draft EECBG Recovery Act Reporting Program Guidance – Proposed Monthly Reporting Requirements

Thank you for the opportunity to provide comments to the referenced proposed changes. The County of San Diego, California was awarded its EECBG #DE-EE000Q902 on December 4, 2009 for \$5,140,200 under a formula grant. The County of San Diego is opposed to the increased reporting requirements (new monthly reports in addition to the current quarterly reporting schedule). The current quarterly reporting via the PAGE system and FederalReporting.gov accurately captures the status of the County's 15 EECBG activities. The imposition of monthly reporting requirements for entities receiving over \$2 million in EECBG funding would not substantially improve the quantity or quality of information available to the Department of Energy (DOE).

The current quarterly reporting already accurately captures the status of the County's 15 activities under the EECBG. There is limited incremental progress to report on a monthly basis, therefore, monthly reporting will likely provide duplicative information, as well as significantly hinder the ability to manage activities. Furthermore, monthly reporting would significantly tax our already restricted budget for administration of this grant without considerable gain to grant monitoring.

The DOE estimate of burden for this new reporting requirement is severely underestimated at approximately three hours per month per respondent; based on the current experience with the quarterly reporting requirement which takes much longer than three hours to complete. The additional burden of monthly reporting would be a distraction of resources from the fundamental purpose of the Recovery Act and this grant, which is to focus on project implementation, job creation and energy efficiency. It would unproductively divert those resources to the already laden administrative costs with no increase in the allowable administrative costs under the grant.

We ask that you consider the weight of our comments, along with those from other jurisdictions that have been posted to your Information Resources website, and abandon the proposal for additional monthly reporting.

Thank you for your consideration of these comments.

A handwritten signature in cursive script, appearing to read 'A. Heinze', is positioned above the printed name.

April Heinze
Director, Department of General Services
County of San Diego