



CITY OF
TUCSON

OFFICE OF
CONSERVATION AND
SUSTAINABLE
DEVELOPMENT

February 2, 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

And

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

Re: Federal Register, January 21, 2010 (Volume 75, Number 13)
Energy Efficiency and Conservation Block Grant (EECBG) Program
Status Report

The City of Tucson appreciates the opportunity to comment on the above referenced Federal Register. Specifically, we would like to comment on the proposed monthly reporting requirement for EECBG recipients with formula allocations greater than \$2 million. The City of Tucson is funding 11 projects managed by seven departments with our EECBG allocation. Although the requirements would be to report data to the DOE via PAGE on only a subset of the key metrics on a monthly basis, our recent experience has shown that the existing OMB and DOE quarterly reporting requirements are extremely labor-intensive and time-consuming.

As a governmental agency, we are proponents of transparency and accountability. However, an additional monthly reporting requirement will add to our staff's workload and in our opinion their time could be better spent actually implementing projects to achieve the intent of EECBG funding to stimulate the economy, create jobs, and reduce energy use.

Thank you for your consideration of these comments

Sincerely,

Nicole Urban-Lopez
Office of Conservation and Sustainable Development
City of Tucson, Arizona
(520) 837-6934