



February 3, 2010

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

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

RE: DOE Recovery Act Reporting Requirements for the Energy Efficiency and Conservation  
Block Grant (EECBG) Program

Dear Sir or Madam:

Thank you for the opportunity to provide comments to the proposed changes as outlined in the Federal Register, January 21, 2010 (Volume 75, Number 13). The City of Charlotte, North Carolina (Charlotte) opposes the proposal to increase the frequency of EECBG reporting requirements to include a monthly reporting schedule.

Charlotte believes in the accountability and transparency goals articulated in the ARRA program. To that end, over the past year, City staff has worked diligently to establish an accounting and reporting system that meets the federal government's expectations. City staff has also worked diligently to develop an Energy Efficiency and Conservation Strategy (EECS) that will meet the goals of the Department of Energy (DOE) in an efficient and successful manner. Charlotte is currently working with DOE staff to finalize our application for the remainder of our EECBG allocation. The administrative burden associated with these efforts has been substantial and strained the City's resources during a particularly difficult time.

The additional administrative burden that will result from a monthly reporting schedule will hinder Charlotte's ability to successfully implement its EECS and provide the everyday services our citizens expect. City staff already spends numerous hours collecting, entering and verifying the data for the EECBG program to the two required websites on a quarterly basis (federalreporting.gov and PAGE); the proposed change to monthly reporting will triple the number of required reports and the time to complete them.

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Charlotte sees no benefit to requiring EECBG recipients to move to a monthly reporting system. We believe the current reporting requirements are adequate, and the proposed requirements would only add additional administrative burdens that will impede City staff's implementation of a successful EECS and its ability to continue to deliver the high quality of customer service our citizens have come to expect.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Ron Kimble". The signature is fluid and cursive, with the first name "Ron" and last name "Kimble" clearly distinguishable.

Ron Kimble  
Deputy City Manager

cc: Curt Walton, City Manager