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DIVISION OF ENERGY MANAGEMENT

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Washington, DC 20503

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

RE: Comments on the Request for Information on the U.S. Department of Energy's (DOE) Proposal on the Energy Efficiency and Conservation Block Grant Program: Emergency Agency Information Collection

Thank you for the opportunity to provide comments to the referenced proposed changes. Below please find the City of New York's response to the proposed increased reporting requirements to include monthly reports in addition to quarterly reports.

The City is strongly opposed to the proposed change. We believe that the benefit of added transparency from monthly reporting will be far outweighed by the cost of staff time spent on gathering data and the consequential delay in project implementation. Given that an additional reporting requirement will further hinder our progress, this proposal seems to be at odds with previous US DOE guidance that timeliness of project implementation is an important part of the recovery effort.

Under the current process, we estimate that the collection, analysis, and verification of data for the quarterly S.1512 and PAGE reports requires at least two weeks of work with two staff members working full-time and up to four additional staff assisting on a part-time basis. This resource need is expected to increase as more projects enter into construction and implementation phases. The added administrative burden of a monthly reporting requirement will impede project implementation by diverting additional staff time to focus on reporting. Further, the nature of construction projects is such that reporting on a monthly basis as opposed to a quarterly basis will show only incremental progress, therefore providing only a minimal marginal benefit at a high marginal cost in

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& Health*

*Transportation
Services*

The City Record

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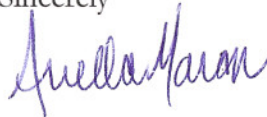
terms of staff time and project delays. Thus, monthly reporting will neither significantly enhance or improve transparency with respect to our EECBG spending, nor improve our DOE Project Officer's ability to evaluate our performance under the EECBG grant guidelines.

Monthly reporting will also impact our DOE Project Officer's ability to move the project and subcontractor approval process forward. Since we received our award agreement more than four months ago, we have been working closely with our Project Officer to obtain the necessary approvals on all of our sub-contractors. This alone has required a significant amount of our Project Officer's time and attention, and we fear that additional reporting requirements will slow down the approval process, further delaying project implementation.

The City of New York is committed to transparency and full accountability with respect to how Recovery Act funds are being spent and are benefiting the public. In fact, we have developed our own Stimulus Tracker website (<http://www.nyc.gov/stimulus>) in order to make this information more readily available to New Yorkers. Our website mirrors the information required by the federal government under ARRA, but also provides more complete and comprehensive data, tracking ARRA dollars from the initial allocation to the City; to their distribution to City programs or capital projects; through the steps of contracting and expenditures; and finally to the ultimate impact of each funded project on the lives of New Yorkers. However, we see no added benefit to the public from this new proposal by DOE, only additional barriers and delays to moving forward with the implementation of important energy efficiency projects.

Once again, we appreciate this opportunity to provide feedback, and we urge you to consider these comments and withdraw the current proposal to increase reporting requirements. Please feel free to contact my office with any questions.

Sincerely



Ariella Maron