



# CITY OF LONG BEACH

CITY MANAGER

333 W. Ocean Blvd, 13th Floor ! Long Beach, CA 90802 ! 562.570.6396

OFFICE OF SUSTAINABILITY

February 3, 2010

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

Dear Mr. Norcross:

This letter is in response to the DOE Recovery Act Reporting Requirements for the EECBG Program. The City of Long Beach is not supportive of adding a third reporting requirement, which increases the amount spent on administrative costs and detracts from Congress' intent of spending the money directly on shovel-ready projects that demonstrate energy savings, reduce fossil fuel emissions and the create jobs.

The City of Long Beach is currently responsible for reporting to two Federal Agencies (DOE, OMB) in two different online systems with two sets of reporting criteria on two different reporting timelines for the EECBG funds. The City is required to submit quarterly reporting of data to the DOE via PAGE and is required to submit monthly reporting to OMB via FederalReporting.gov. In total, the City of Long Beach is responsible for reporting data 16 times per year. This existing reporting schedule, while time consuming, was present as part of the EECBG grant information and was an expected part of what was required as a part of the EECBG Program.

The new reporting guidance is requiring the City to report additional monthly data to the DOE via PAGE. This means the City of Long Beach is responsible for reporting data an additional 12 times per year. This is a 75% increase in reporting requirements and is in addition to the other 16 reporting requirements that already exist. This sudden increase in onerous reporting requirements is startling, as funding for this additional reporting activity was not considered in the original program proposal. The City's EECBG proposal was crafted with certain reporting requirements being understood and incorporated into the budget and scope of work. The City's total project costs are limited to the grant amount of \$4,397,500 and the additional reporting requirements do not come with additional funding or support. Money spent on meeting new reporting requirements detracts from implementation of municipal energy efficiency retrofits and residential energy efficiency rebates and limits the City's ability to maximize funds to accomplish these projects.

The City is not supportive of the additional 12 monthly reporting instances per year to the DOE via PAGE. Long Beach understands the importance of reporting to ensure proper use and distribution of funds; however, it is equally important that the EECBG money be spent on its intended purpose without being circumvented to cover administrative processes.

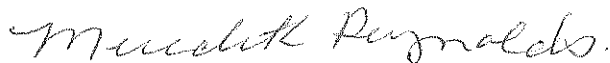
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RE: DOE Recovery Act Reporting Requirements for the EECBG Program

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The City of Long Beach believes that the current reporting requirements are sufficient to meet the DOE's goals of effectively monitor and report the return on investment of EECBG funds in terms of jobs created and energy saved. The City of Long Beach strongly recommends that the DOE Recovery Act Reporting Requirements for the EECBG Program remain as quarterly reporting of data to the DOE via PAGE and monthly reporting to OMB via FederalReporting.gov for a total of 16 times reporting instances per year.

Sincerely,

A handwritten signature in cursive script that reads "Meredith Reynolds".

Meredith Reynolds  
Sustainability Coordinator

MR

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