



MAYOR ASHLEY SWEARENGIN

February 2, 2010

Frank Norcross, EE-2K
U.S. Department of Energy
1000 Independence Ave, S.W.
Washington, D.C. 20585-1290
Via Facsimile: 202-586-1233

Dear Mr. Norcross,

Thank you for the opportunity to provide comments regarding revised reporting requirements for Energy Efficiency and Conservation Block Grant recipients. Attached are formal comments provided by our Sustainable Fresno Division in regard to this solicitation. I have greatly appreciated the assistance and feedback DOE has provided to the City thus far, and look forward to continuing to work with you on the implementation of this useful program.

Please feel free to contact my office or Joseph Oldham, Sustainability Manager, with any questions. We look forward to your feedback regarding our concerns.

Sincerely,

Ashley Swearengin
Mayor



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John M. Dugan, AICP
DIRECTOR

February 3, 2010

Frank Norcross, EE-2K
U.S. Department of Energy
1000 Independence Avenue, S.W.
Washington, D.C. 20585-1290
Facsimile: 202-586-1233
Email: frank.norcross@ee.doe.gov

Dear Mr. Norcross:

The City of Fresno is very thankful and appreciative of the opportunity presented to us by the \$4.6 Million in funding we have received from the U.S. Department of Energy (DOE) through the Energy Efficiency and Conservation Block Grant program. This funding is allowing the City of Fresno to engage in an unprecedented series of activities designed to achieve sustainability for our community by 2025. The City of Fresno launched its program called Sustainable Fresno on July 1, 2009 and has been actively engaged in the implementation of the strategies outlined in the Energy Efficiency and Conservation Strategy we submitted with our application for funding.

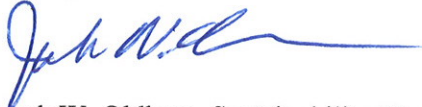
As with all new programs there have been some challenges to overcome and the reporting associated with the OMB reporting requirements under the American Recovery and Reinvestment Act combined with the extensive reporting required by DOE has been one of them. Having just completed our first quarterly reporting to both agencies, we are deeply concerned about the current proposal to require monthly reporting to DOE in addition to the current quarterly reports beginning in March 2010. While the City of Fresno strongly supports transparency and accountability for all funding expended for public purposes, this added reporting requirement being imposed at this early stage of program implementation is premature and will only cause added confusion for both recipients and DOE.

Our situation regarding the receipt of our award and reporting for the first quarter is an example of this point. The City received its official award for formula funding on December 15, 2009. Our Project Officers in Golden, CO contacted us the following week and discussed how we would be making adjustments to our project objectives over the next few months and the process for making adjustments in our budget allocations based on evolving needs within our program. We submitted our first quarterly report to OMB on January 7, 2010 and our PAGE Performance report on January 26, 2010. Both reports were time consuming, but our primary concerns are the lack of support through PAGE for report questions, confusion related to metrics, and lack of direction from DOE regarding milestones. Our Project Officer informs us that we will be working on the milestones and metrics during the coming weeks. Working with DOE staff to make adjustments for improved clarity of accomplishments and transparency is welcome, but the proposed monthly reporting will be starting in March and cover the period in February when we are still making changes in our program. This will mean data reported for February will likely be changing for March. This will be confusing for anyone not directly associated with the program.

We believe that a more appropriate time to begin the monthly reporting would be after the second quarterly report due April 30, 2010. A starting date of May 20, 2010 for data from the month of April would be more reflective of actual program performance. At that point, most of the jurisdictions should be settled into implementing their programmatic elements and have any revisions completed. Data and metrics will have been reviewed twice by DOE staff and adequate feedback provided to recipients to refine accuracy and content.

Thank you for considering these comments about the proposed monthly reporting requirement for the EECBG program. The City of Fresno Sustainable Fresno Division is committed to the successful implementation of all activities funded through the EECBG program. Please do not hesitate to contact me at (559) 621-8030 if you have any questions about our program.

Sincerely,



Joseph W. Oldham, Sustainability Manager
Sustainable Fresno Division
City of Fresno Planning and Development Department