

M. JODI RELL
GOVERNOR

STATE OF CONNECTICUT
EXECUTIVE CHAMBERS

February 4, 2010

DOE Desk Officer
Office of Information and Regulatory Affairs
Office of Management and Budget (OMB)
New Executive Office Building
Room 10102
725 17th Street, NW
Washington, DC 20503

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

Re: Department of Energy, Proposed Emergency Agency Information Collection, (FR Doc. 2010-1057)

Dear DOE Desk Officer and Mr. Norcross:

As Connecticut's Recovery Act Coordinators we are pleased to submit these comments on the Department of Energy's proposed monthly reporting requirements affecting the Weatherization Program, the State Energy Program and the Energy Efficiency and Conservation Block Grant.

As you know the requirements imposed upon recipients of funding pursuant to the American Recovery and Reinvestment Act of 2009 (ARRA) necessitate an unprecedented amount of cooperation and collaboration between all levels of government and other entities who may be sub-recipients or vendors. Understanding the importance of getting ARRA funds out into the community quickly while at the same time creating mechanisms to meet ARRA's rigorous transparency and accountability standards, we and our partners throughout state government and the broader community have been energized by the challenges that ARRA presents. Frankly, the level of cooperation and partnership that ARRA has spawned has been truly remarkable. At a time of budgetary cutbacks and general economic recession, however, it has not been easy to meet these challenges.

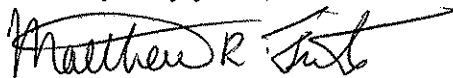
While we share the Department's desire to track ARRA spending and to measure program successes, most notably job creation, we believe that the proposed monthly reporting requirements would add significantly to the administrative burden our recipients and sub-recipients currently bear. They would not only be required to report more frequently, but would be required to collect many additional pieces of data.

Our agencies have designed reporting mechanisms based upon the initial ARRA reporting guidance and have specified these reporting requirements in their contracts and other agreements with their sub-recipients. Significant changes to the original guidance will require corresponding changes to the current reporting mechanisms and contracts with sub-recipients. We do not believe that the additional information that would be derived from monthly reporting justifies the enormous effort that would be required to produce it. Frankly, we believe that the overall effect of the proposed reporting requirements would be to divert limited resources away from achieving the goals of the specific ARRA programs such as weatherization.

We would strongly urge the Department to reconsider its proposed changes and allow the recipients of ARRA Energy funds to concentrate their efforts on creating the jobs and efficiencies that are the goals of ARRA, rather than on seemingly continual reporting.

Thank you for the opportunity to comment on these pending changes to ARRA reporting requirements.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Matthew R. Fritz", with a stylized flourish extending from the end.

Matthew Fritz
CT ARRA Coordinator

A handwritten signature in dark ink, appearing to read "Mary Anne O'Neill", with a stylized flourish extending from the end.

Mary Anne O'Neill
CT ARRA Coordinator