

Norcross, Frank

From: Dave Schmenk [SchmenkD@mcoho.org]
Sent: Thursday, February 04, 2010 1:19 PM
To: Norcross, Frank
Cc: Hinnen, Britt; Rosalind Bertolo; Vijay Chitkara; Phil Miller; mbelarmino@naco.org
Subject: Comments Concerning Proposed Changes to EECBG Reporting Requirements from Quarterly to Monthly.
Follow Up Flag: Follow up
Flag Status: Red

Mr. Norcross and the U.S. DOE:

These comments concern the U.S. DOE's proposed changes to the EECBG Program reporting requirements from quarterly to monthly for EECBG Award recipients of over \$2 million, as outlined in the Federal Register dated January 21, 2010 (Volume 75, Number 13, Page 3454-3455, DOCID: fr21ja10-30). Montgomery County, Ohio is the recipient of an EECBG Award of \$2,739,900 (Award No. DE-EE0000711 dated 10/19/09, CFDA No. 81.128).

The Montgomery County, Ohio EECBG Program Management Team is opposed to the U.S. DOE's proposed changes to the reporting requirements from quarterly to monthly for the EECBG Program for the following reasons:

1...The quarterly reporting process, on which guidelines and requirements are still being developed, is still a work in progress. We believe that the quarterly reporting process is sufficient, and should be developed further before considering changing to a monthly reporting system.

2...Changing the reporting requirements from quarterly to monthly (increasing the number of reports from 4 to 12 per year), significantly adds to the administrative and reporting burden of the EECBG Program. Since Montgomery County is receiving no funding for administrative expenses through this grant program, and will not be able to hire additional staff, we believe this proposed requirement would be an undue burden.

3...Montgomery County is applying the vast majority of this funding (~95%) directly for energy retrofit projects (~24) in its government buildings. Due to County budget cuts, the County workforce has been reduced. Therefore, any time that our staff needs to spend on additional reporting requirements will take away directly from the time spent on implementing these energy retrofit projects, thereby delaying their progress toward completion.

Thank you for your consideration of these comments.

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