



OFFICE OF THE MAYOR MIAMI-DADE COUNTY, FLORIDA

CARLOS ALVAREZ
MAYOR

February 4, 2010

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

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

RE: Draft Monthly Reporting Guidelines for the Energy Efficiency and Conservation Block Grant Program

Dear Mr. Norcross and OMB officials:

Miami-Dade County has reviewed the Department of Energy's (DOE) proposed monthly reporting requirements on the Energy Efficiency and Conservation Block Grant (EECBG) program, which were released for public comment on January 21, 2010. As a recipient of more than \$12 million in EECBG formula grant money, the proposed change from the current quarterly reporting to monthly reporting affects Miami-Dade County. Miami-Dade County is in favor of maintaining quarterly reporting rather than monthly reporting.

Miami-Dade County's Office of Sustainability (OOS) is managing 14 large and varied projects with project managers from eight County departments, not including departments providing internal service support such as the Department of Procurement Management, General Services Administration, Finance and Office of Capital Improvements. Achieving the quarterly reporting requirements of the American Recovery and Reinvestment Act and DOE is already a formidable task in an organization as large as Miami-Dade County. With the current economic downturn and decrease in property-tax revenue, County agencies are leaner than ever, particularly in administration. Therefore, many users of PAGE are the same project managers whose core responsibility is completing numerous projects (including EECBG projects). Increasing the frequency of reporting will hinder their ability to manage these wide-ranging public responsibilities.

While the PAGE reporting system is user-friendly to navigate, Miami-Dade has encountered reporting challenges ranging from duplicative paperwork, online system glitches, and unclear definitions related to the information that should be submitted into PAGE on metrics or

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milestones reporting. Changing the quarterly reporting requirement to monthly would require significantly streamlining the reporting process in PAGE. For example, PAGE does not allow the grantee to begin a new quarterly report until the one previously submitted has been approved by DOE. This impedes Miami-Dade's ability to input information into the system on a real-time and continuous basis. I must say that the DOE Golden Field Office has been extremely responsive, cooperative and a pleasure to work with while sorting out these difficulties.

Our experience from the last two reporting quarters shows that staff spent over two weeks compiling, organizing, verifying and completing reports. As the projects evolve, the reporting will become even more detailed, requiring more preparation time. With more time reporting, less time is spent on the actual projects.

Monthly reporting, versus quarterly, will not improve the accuracy of reporting the status or progress of our EECBG projects. In fact, the DOE proposal states that "DOE recognizes that as more accurate becomes available, recipients may need to amend their monthly reports after submission." If that is the case, it does not seem prudent to move ahead with monthly reporting. Quarterly reporting is a fair, balanced and an accurate manner to report our progress with these very important grant dollars.

Thank you for the opportunity to provide comments regarding these proposed changes.

Respectfully,



Carlos Alvarez
Mayor

C: George M. Burgess, County Manager
Susanne M. Torriente, Director, Office of Sustainability
Daniel T. Wall, Director, Office of Grants Coordination
Joe Rasco, Director, Office of Intergovernmental Affairs