



***National League of Cities***



February 4, 2010

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

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

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

Dear DOE Desk Officer and Mr. Norcross:

On behalf of the leading national organizations representing local governments, we are writing to register our concerns with the pending proposal to require monthly reporting by certain recipients of Energy Efficiency and Conservation Block Grant (EECBG) funds provided under ARRA.

We applaud and support the Administration's efforts to promote greater transparency in the use of governmental resources, but at the same time we strongly believe the objectives of increased transparency would be fully advanced by existing Department of Energy directives requiring EECBG recipients to report quarterly on program activities. Any incremental benefits of monthly reporting would be substantially outweighed by the added reporting burdens it will impose on grantees, especially at this critical juncture in the program as EECBG program recipients work to launch new programs and activities and create new jobs and stimulate the economy. It is a matter of record that senior Administration officials and Congressional leaders are anxious for the prompt and timely investment of ARRA resources, including EECBG funds, to take advantage of the economic stimulus that will result, an objective that will not be advanced at this time by the imposition of this proposed requirement.

Any reasonable assessment of the current status of EECBG program delivery would conclude that Departmental and grantee staff resources must remain focused on speeding up program approvals, completing and comprehending supplemental program guidance and instruction as well as undertaking other activities to support the successful and timely deployment of available resources. We believe the imposition of a new and more frequent reporting regime will divert and distract grantees now laboring to launch significant projects and program activities at this time. DOE is still in the process of finalizing some of the guidelines that will allow local governments to implement the EECBG program, and so it seems counterproductive to force local governments to respond to these changing requirements as they implement a brand new program and add new reporting

requirements at the same time recipients, DOE and Congress all strive to invest these resources in our communities in a timely manner.

With the relatively short comment period, it was not possible to prepare a detailed analysis of the estimated costs and time burdens that would be imposed by monthly reporting. However, information collected by our organizations from direct contacts with grantees as well as surveys indicates that this proposal would impose significant and unnecessary burdens, requiring the redirection of staff and contractor resources. Our concerns are accentuated by the fact that grantees have indicated for some time that they are already challenged in meeting quarterly reporting requirements, often expressing frustration that existing reporting systems are not as seamless and user-friendly as they should be.

In our work with larger city and county grantees, we know that these local governments are generally those with the most substantial in-house capacities and wherewithal to adjust to more complex federal requirements. As such, it is notable that they have been very consistent in registering strong opposition to the pending proposal. Because of their scale, many of these jurisdictions have already developed their administrative systems, including budgeting of staff resources, and contractor requirements as they strive to undertake larger and often more complex projects and program initiatives. They assert that a new monthly reporting regime would unnecessarily divert resources and staff time, require additional DOE reviews, and distract grantees at this crucial juncture as they seek to launch this program.

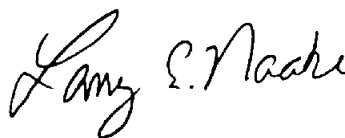
In this notice, DOE is soliciting comments on the question of moving forward with monthly requirements for larger EECBG grantees, a decision that has already been made for state recipients under the State Energy Program (SEP) and the Weatherization Assistance Program (WAP). As such, we would urge DOE officials to evaluate fully their experience in monthly filings with state grantees under these programs before making a final decision on whether and how monthly reporting requirements might apply to EECBG program grantees.

On behalf of our organizations, we appreciate this opportunity to comment on the pending notice and urge that the quarterly reporting requirements be maintained.

Sincerely,



Robert J. O'Neill  
Executive Director  
International City/County  
Management Association



Larry Naake  
Executive Director  
National Association of Counties



Don Borut  
Executive Director  
National League of Cities



Tom Cochran  
CEO and Executive Director  
The United States Conference of Mayors