

To: Frank Norcross, EE-2K
U.S. Department of Energy
Subject: Comments on the Recovery Act Reporting Program Guidance
Date: February 4, 2010

Dear Mr. Norcross,

ICLEI sees great potential benefit that could be derived from data gathered through the reporting requirements of the Recovery Act. While we recognize the primary goal of reporting requirements is to enable an evaluation of the effect of the entire program and each individual section (WAP, SEP, and EECBG), reporting requirements could be structured such that actionable information is obtained that could further the impact of the Recovery Act well beyond the initial implementation of the funding recipients.

Several adjustments could be made that would help to produce the kind of information that could be used to assist future activities aimed at reducing fossil energy use and promoting renewable energy. ICLEI recognizes that part of drafting appropriate reporting requirements is to reduce the burden of reporting and we do not wish to add unnecessary complexity. Any of the following suggestions could be optional for those recipients who have the ability to provide more detailed information.

- 1) Include the ability to indicate the location of program activities that could be used to account for climactic influences (heating and cooling degree days) on the outcomes of weatherization, HVAC, and other heating and cooling projects. This would be particularly useful for state administered funds where large geographic differences occur within a state.
- 2) Include the ability to report "Critical Metrics" in such a way as to associate them with individual projects rather than as aggregate savings figures by sector alone.
- 3) Include the ability to specify building types and characteristics where an action is taken, rather than aggregated by sector alone.
- 4) For those recipients not utilizing the DOE supplied "Critical Metrics Calculator", require that they specify the approach used to make their calculations.

Again, ICLEI feels this type of information would prove useful. It may be possible that the Department of Energy intends to collect this type of information as part of post-implementation studies and reviews. However, we believe the public will be best served if the large amount of data created by the Recovery Act can be collected to be made useful for replicating the successes of its recipients and made publicly available for those attempting to do so.

Regards,
Mike Steinhoff,
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