

Norcross, Frank

From: tfreid@co.durham.nc.us
Sent: Thursday, February 04, 2010 5:26 PM
To: Norcross, Frank
Subject: EECBG monthly reporting
Follow Up Flag: Follow up
Flag Status: Red

I am writing with serious concerns about the monthly reporting requirements for EECBG recipients receiving more than \$2 million. The City of Durham has been awarded \$2.1 million in EECBG funds and is working hard to expend the funds in a manner that complies with all laws and requirements as well as maximizes job creation and energy conservation. I oppose the proposed changes and feel they are not in the best public interest because they redirect resources from job creation and energy conservation to administrative tasks with no real benefit.

- 1) We are already strained with the requirements of spending the funds, tracking the metrics, and reporting the results on a quarterly basis for two agencies. Adding additional monthly requirements will further increase our administrative burden (without a concomitant increase in administrative funds) and reduce our ability to put our resources into the actual project work.
- 2) There is not so much change from one month to another in project status to warrant monthly reporting. These projects take time, and measuring the benefits take time. Quarterly reporting is appropriate because it allows for enough work to take place to have something to report.
- 3) We have already entered into contracts with vendors/subrecipients based on quarterly reporting. Adding additional monthly reporting increases their administrative burden without compensating them for that additional work. It takes a lot of time to get data from subrecipients because there is a few weeks of lag time between the work being done, the invoices being submitted, and the payments to be made.
- 4) Having such frequent reporting may deter contractors from participating in EECBG work. Smaller companies, in particular, that lack the resources to do the monthly reporting will likely decide not to bid on projects, thus narrowing the pool of prospective contractors to those that are larger.

I urge DOE to reconsider making this change and allow us to remain on a quarterly reporting basis. There are already checks on the communities receiving more than \$2 million, most importantly that we won't receive all of our funding if we don't demonstrate that we are spending the funds expeditiously and prudently. The monthly reporting requirement only adds an additional burden that will make complying with those requirements more difficult.

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