Norcross, Frank

From: Payne, Greg [Greg.Payne@development.ohio.gov]

Sent: Thursday, February 04, 2010 5:41 PM

To: Norcross, Frank
Cc: Howard, Nadeane

Subject: Comments for EECBG and SEP Reporting Program Guidance

Follow Up Flag: Follow up Flag Status: Red

These comments apply to both SEP and EECBG reporting guidance:

It would be helpful if it was clarified that States only report critical Metrics one time when the subrecipient project is completed, and that emission reductions are annual reductions, and energy savings are annual energy savings. The tool that is provided seems to estimate annual renewable energy generated as well. It would be a burden if states had to estimate impacts for projects that are partially completed, or if every month after the project is completed, we resubmit the same information for a project that is not changing, and its impact is not altered.

This comment applies to EECBG reporting guidance:

On page 1 it states: "The provisions of this guidance apply to prime recipients (i.e. States, units of local government, and Indian tribes) named in a Notification of Grant Award as the recipients of financial assistance under the Department of Energy (DOE) Energy Efficiency and Conservation Block Grant (EECBG) Program and select sub-recipients as determined by the prime recipient."

When you say "select sub-recipients" how is that defined? What sub-recipients are states supposed to apply this to? If it is sub-recipients are "determined by the prime recipient" is this an optional reporting system?

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