



CITY OF HOUSTON

General Services Department

Annise D. Parker

Mayor

Issa Dadoush, P.E.
Director of General Services
P.O. Box 1562
Houston, Texas 77251-1562

T. 832-393-8021
www.houstontx.gov

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DOE Desk Officer
Office of Information and Regulatory Affairs
Office of Management and Budget
New Executive Office Building
Room 10102
725 17th Street, NW
Washington, D.C. 20503

Frank Norcross, EE-2K
U.S. Dept. of Energy
1000 Independence Ave., SW
Washington, D.C. 20585-1290

Delivered via E-mail to frank.norcross@ee.doe.gov

RE: Public Comment - Department of Energy proposed draft reporting guidance document under for the Energy Efficiency Conservation Block Grant (EECBG) program

Mr. Norcross:

Thank you for the opportunity to provide public comment to the Department of Energy's (DOE) proposed draft reporting guidance document for programs under the 2009 Recovery Act, as published in the January 21 Federal Register. The City of Houston has demonstrated its commitment to compliance with transparency and accountability rules and regulations, and as stewards of public funds, we hold open and responsive government in the highest regard. We strive to do this in the most efficient way possible.

The City of Houston respectfully requests the DOE to keep reporting guidance consistent, clear, and simple. Over the last year, the City has developed a largely automated process for Recovery Act reporting. Numerous modifications to the reporting requirements have caused significant disruption to the system which in turn required program staff to manually generate reports.

It is the City of Houston's position that the DOE's proposed reporting guidance places an undue and unfair burden on EECBG recipients. Our specific comments follow.

(a) Whether the proposed collection of information is necessary for the proper performance of the functions of the DOE, including whether the information will have practical utility;

The City requests the DOE to consider to utility of other metrics that can gauge energy consumption and reduce demand for downstream and upstream energy. For example, a portion of our award is funding the expansion of single-stream, residential, curbside recycling, the metrics listed in the

Council Members: Brenda Stardig Jarvis Johnson Anne Clutterbuck Wanda Adams Mike Sullivan Al Hoang Oliver Pennington Edward Gonzalez
James G. Rodriguez Stephen C. Costello Sue Lovell Melissa Noriega C.O. "Brad" Bradford Jolanda "Jo" Jones Controller: Ronald C. Green

guidance are not as applicable to this program as they are to a building retrofit program. Therefore, we submit that such metrics as waste diversion, cubic meters of landfill space saved or tonnage of waste diverted should be included among the possible metrics tracked. While non-traditional, these metrics are valuable when one considers the impact on the broader concept of energy and resource efficiency (for example, upstream energy conservation for the collection and manufacturing of virgin material) beyond direct BTUs or KWh saved.

(b) The accuracy of the agency's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions used;

It is our opinion that assuming directly funded local communities, such as Houston, will spend two hours each month preparing each report is an understatement of the associated reporting time burden. Drawing upon our experience with previously awarded ARRA funds that only require Section 1512 reporting to the OMB, we have experienced a data collection and reporting burden that far exceeds two hours per month. As the proposed guidance requires the additional PAGE reports, this requirement will likely increase beyond that of the other ARRA awards that have been awarded to the City of Houston. Additionally, the upfront cost of instituting a mechanism to make reporting a simple process and training city employees to use this system is not accounted for in this estimated number of reporting hours.

Further, it is our opinion that two hours per month does not take into account the size of the award or the complexity of the programs at hand. Large cities, like some states, must aggregate data from several sub-recipients and vendors. Compiling the data and submitting the report may only take two hours, but this does not include the time and cost of employee training and familiarization with new reporting requirements nor the data collection and analysis specific to this program.

This guidance further increases the reporting time burden by requiring recipients to divide performance data and report separately on outlays resulting from ARRA and non-ARRA funds. It is the opinion of the City of Houston that the DOE should receive full credit for the projects being funded through this program as these projects would not be implemented if it were not for this funding award. Therefore, as the full program is benefiting our citizens and creating jobs, performance of the complete program should be accounted for in its entirety.

The one area in which the City of Houston has agreed that the time burden could be drastically reduced would be to limit the number of reports due every third month. Requiring a quarterly and monthly reporting of data to DOE via PAGE on top of the quarterly report to the OMB is not only inefficient use of time and a waste of taxpayer dollars, but also, redundant as we will be spending time submitting duplicate information to multiple federal agencies. We urge the federal agencies to institute a mechanism in where these two agencies requesting similar if not identical information can share without doubling the reporting requirements on the award recipient.

(c) Ways to enhance the quality, utility, and clarity of the information to be collected; and

As it is difficult to comment directly on the mechanism DOE plans to implement for reporting job creation and retention as the EECBG Program Notice regarding this has not yet been released, the City of Houston urges the DOE to keep the proposed job creation metric and process for calculation consistent with the guidance presented for OMB's Section 1512 reporting requirements. It is our opinion that the current jobs reporting mechanism is adequate if not somewhat onerous reporting process in of itself. To add to this burden would not only be redundant but counterproductive if the results from these differing reporting mechanisms were to conflict. Again we urge data sharing or creation of an interface between the PAGE reporting system and the OMB's FederalReporting.gov system.

Similar to our concern regarding under-accounting of project benefits through the division of project outlays, we are concerned that indirect jobs are not accounted for in the current data collection and analysis mechanism. We therefore urge the appropriate entity, such as the National Economic Council, Bureau of Labor Statistics or the Bureau of Economic Analysis, perform the appropriate data analysis to ensure indirect jobs created or retained are accounted for and that this information is conveyed to our nation's citizens.

(d) Ways to minimize the burden of the collection of information on respondents, including through the use of automated collection techniques or other forms of information technology.

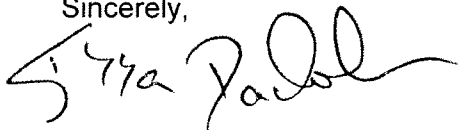
In conclusion, the City of Houston proposes these changes to the proposed guidance in order to minimize the burden on respondents:

- Request that in general, DOE keep all reporting requirements consistent and uniform with the Office of Management and Budget's Section 1512 reporting requirements
- Request the DOE to consider the utility of other metrics that can gauge energy consumption and reduced demand for downstream and upstream energy
- Request that efficiencies from non-federal funded portions of the project, be reported within a single report.
- Request federal agencies develop a mechanism to share reporting data so recipients are not subjected to submitting three reports every third month that contain similar, if not, redundant information.
- Request that DOE's job creation metric and process for calculation is consistent with the guidance presented for OMB's Section 1512 reporting requirements and allow others to account for indirect or induced job creation

Finally, we urge the DOE to consider the added administrative burden of a monthly reporting requirement, which will impede project implementation by focusing limited staff resources on reporting. The nature of large scale energy conservation projects is such that reporting on a monthly basis as opposed to a quarterly basis will show only incremental progress, therefore providing only a minimal marginal benefit at a high cost in terms of staff time and project delays. Thus, monthly reporting will neither significantly enhance nor improve transparency.

Once again, the City of Houston's appreciates this opportunity to provide comments to the DOE.

Sincerely,

A handwritten signature in black ink, appearing to read 'Issa Dadoush', with a stylized flourish at the end.

Issa Dadoush, P.E.
Director of General Services