



# Department of Commerce

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Date: February 4, 2010

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

From: Washington State Department of Commerce – Energy Policy Division  
Contact: Meg O’Leary, (360) 725-3121, meg.oleary@commerce.wa.gov

RE: Comments on proposed draft ARRA reporting guidance for State Energy Program (SEP), and Energy Efficiency and Conservation Block Grant (EECBG) program

Mr. Norcross,

We appreciate the opportunity to comment. While we understand the need for greater transparency and accountability, we believe the monthly reporting requirement would place an undue burden on our agency staff and sub-recipients, interfere with our ability to efficiently manage our programs, and likely would not provide enough new data to justify the extra effort. We do not expect a significant qualitative or quantitative difference between monthly and quarterly data. Further, we believe the monthly reporting would not improve accountability and project performance.

By April 2010, we anticipate at least 100 sub-recipients and numerous vendors will be actively implementing Washington State’s SEP and EECBG program funds. Many of these awardees are small municipalities with limited staff resources, and even with the grant and loan funding, the quarterly reporting requirements will be a challenge. We understand the need for quarterly data collection, but the added layer of monthly reporting will not support efficient project implementation and timely expenditure of federal funds.

We respectfully request that you reconsider the monthly U.S. DOE programmatic reporting requirement.

Regards,

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