

CALIFORNIA ENERGY COMMISSION

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February 4, 2010

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U.S. Department of Energy
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SUBJECT: PUBLIC COMMENT – DRAFT WAP, SEP, AND EECBG RECOVERY ACT
REPORTING PROGRAM GUIDANCE – PROPOSED MONTHLY REPORTING
REQUIREMENTS

Thank you for the opportunity to provide comments to the referenced proposed changes. The California Energy Commission is strongly opposed to the increased reporting requirements (new monthly reports in addition to the current quarterly reporting schedule). We feel the current quarterly reporting requirements are sufficient to capture the status of grant activities and that increased monthly reporting requirements would be detrimental to the implementation of ARRA funded programs and projects for the following reasons:

1. Limited incremental progress to report on a monthly basis which provides limited value to enhanced oversight and management by the U.S. DOE.
2. Increased administrative burden to grant recipients and subrecipients in times when personnel resources are seriously constrained. Staff effort needed to provide monthly reporting would detract from Energy Commission's efforts to efficiently and effectively implement ARRA-funded programs. Staff would be required to collect, verify, format and deliver the data contained in the monthly reports.
3. Increased administrative costs which reduce the benefits (jobs, energy savings, renewable energy installations, GHG emission reductions) accruing from project implementation.
4. Potential inconsistency of data due to multiple, overlapping reporting requirements (monthly and quarterly). Monthly reports must be reconciled to quarterly reports. Inconsistencies will require amendments to monthly reports. Increased administrative burden and costs associated with program implementation.
5. Grant recipients would be in a constant state of reporting and detracted from the implementation and management of projects funded by ARRA.

6. Requirements would probably flow to other ARRA funded programs (Appliance Rebate, Contingency Planning, etc.) which would multiply the negative effects of the increased reporting requirements.
7. The U.S. DOE is already requiring weekly report updates for the SEP program which are not contained within these guidances and not required per our executed grant agreements. These weekly reports add yet another layer of issues including complexity, internal resource constraints, and consistency of data that is provided to DOE.

The California Energy Commission believes that your efforts could be better spent on streamlining the existing reporting process so that one report can be used by all agencies that need the information. This would reduce the burden on resource-constrained grant recipients and subrecipients. The Energy Commission is intent on being transparent, diligent, and forthright with the use of ARRA funding as federal requirements dictate.

We ask that you consider the weight of our comments, along with those from other jurisdictions, and abandon the proposal for additional monthly reporting.

Thank you for your consideration of these comments.

Sincerely,


MELISSA JONES
Executive Director

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