

**Norcross, Frank**

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**From:** Like, Russel [Russel.Like@co.monmouth.nj.us]  
**Sent:** Tuesday, August 03, 2010 12:23 PM  
**To:** Norcross, Frank  
**Cc:** Goldschlag, Bonnie; Kirby, Laura  
**Subject:** Comments on DOE reporting requirement for EECBG

Dear Mr. Norcross:

The Monmouth County Planning Board staff appreciates the opportunity to provide comments on the Department of Energy's reporting requirements for Energy Efficiency and Conservation Block Grant (EECBG) recipients. The Monmouth County Planning Board staff, as the coordinating agency for approximately \$4.2 million in formula EECBG funding granted to Monmouth County, would like to address its comments specifically to the requirement for reporting to DOE on a monthly basis, in addition to the quarterly reporting requirements. The Monmouth County Planning Board staff believes that the imposition of a monthly reporting requirement for entities receiving over \$2 million in EECBG funding has been unduly onerous and has not substantially improved the quantity or quality of information available to DOE.

The projects undertaken by Monmouth County with its EECBG funding are, for the most part, discrete projects which progress through the design phase and are then installed at one time (e.g., higher-efficiency boilers). Therefore, there is limited incremental progress to report on a monthly basis; the county already finds itself repeating material in successive quarterly reports because the time needed to fulfill DOE and other federal requirements, and to progress through the design phase, is measured in months rather than weeks.

Furthermore, the monthly reporting requirement represents a distraction from the task of actually using the EECBG funding. The same county personnel who are responsible for advancing EECBG-funded projects instead devote more of their time to reporting procedures – and, as a consequence, less time to actually advancing those same projects. As a result, the monthly reporting requirement actually delays the use of stimulus funds, and postpones their intended benefits of energy efficiency and job creation. Presumably the additional monthly reports are also reviewed by DOE, where they consume valuable personnel time as well, while yielding little in the way of results.

In summary, additional monthly reporting yields little or no benefit and consumes resources which would be more effective if deployed to the task of implementing the proposed county projects. Therefore the Monmouth County Planning Board staff urges DOE to discontinue the monthly reporting requirement for EECBG recipients with over \$2 million in funding.

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DOE Response to Public Comment on Proposed Information Collection Request

OMB CONTROL NUMBER: 1910-5150

TITLE: Energy Efficiency and Conservation Block Grant Program Status Report  
Federal Register Notice (60 Day): July 14<sup>th</sup>, 2010 (Vol. 75, No. 134 pp. 40796)

Commenter: Monmouth County, NJ

Date of comment: August 3<sup>rd</sup>, 2010

**DOE Response:**

*DOE acknowledges that the monthly reporting requirements in the EECBG reporting guidance (EECBG 10-07A) represent an undue burden on EECBG recipients with formula allocations >\$2M. Under this guidance, applicable recipients were required to report outlays, obligations, and some performance metrics by project activity on a monthly basis. Anecdotal feedback from EECBG Project Officers and recipients indicated that the report of performance metrics by activity on a monthly basis was particularly burdensome and of marginal utility. This observation is consistent with your stated assertions.*

*As such, in the forthcoming revision to the reporting guidance (EECBG 10-07B), recipients will only be required to report outlays by project activity on a monthly basis. To minimize the burden represented by this monthly reporting requirement, monthly outlays will be automatically summed in PAGE to populate the quarterly performance report. DOE believes that the report of outlays on a monthly basis provides essential transparency on amount and object of Recovery Act expenditures. DOE estimates that the reduction in requirements amounts to an approximate 40% reduction in the annual reporting burden and should concurrently reduce confusion amongst grantees. Furthermore, the reduced burden should allow municipal staff to focus on the implementation of Recovery Act project funded under EECBG.*