



National Association of State Energy Officials

January 13, 2023

Director Henry McKoy
Office of State and Community Energy Programs
U.S. Department of Energy
1000 Independence Avenue SW
Washington, DC 20585

RE: Request for Information DE-FOA-0002883 on the Energy Efficiency and Conservation Block Grant Competitive Program

Dear Director McKoy:

On behalf of the National Association of State Energy Officials (NASEO), thank you for the opportunity to provide input regarding the solicitation process and structure of the Energy Efficiency and Conservation Block Grant (EECBG) Competitive Program. As the representative association for the governor-designated Energy Office Directors from the 56 states, territories, and District of Columbia, NASEO would like to elevate opportunities for coordination between the EECBG Formula allocations that will be distributed to the State Energy Offices and the critical investments that the U.S. Department of Energy (DOE) Office of State and Community Programs (SCEP) will be making through the Competitive EECBG Program. Below please find our responses to select questions in the RFI and recommendations for structuring a highly impactful and accessible program.

Category 1: Partnerships and Leveraging Investments, Question g: What policies, infrastructure, or other considerations could be put in place to enable the program to be more successful?

To increase coordination and clarity between the EECBG Competitive Program and the sub-allocations that State Energy Offices will make to local governments, NASEO recommends that SCEP clarify whether localities can receive awards from both sets of funds. If multiple awards to the same recipient are allowable, then NASEO recommends that SCEP coordinate with State Energy Offices to disclose applicants to the program. In some circumstances (i.e., in the case of severely resource-constrained applicants), the ability to tap into both the state and DOE for funding opportunities may help an applicant develop more impactful proposals, plans, and projects; in others, however, it may be preferable to distribute available funds across a wider range of applicants. We encourage DOE to consider the State Energy Offices as partners in deciding these outcomes on a case-by-case basis by encouraging information-sharing across the two EECBG programs.

1300 North 17th Street
Suite 1275
Arlington, Virginia 22209
Telephone: 703.299.8800
www.naseo.org

BOARD OF DIRECTORS

Chair
KELLEY SMITH BURK
Florida

Vice Chair
JOHN WILLIAMS
New York

Treasurer
MOLLY CRIPPS
Tennessee

Secretary
WILL TOOR
Colorado

Past Chair
ANDREW MCALLISTER
California

Parliamentarian
JASON LANCIOS
Louisiana

Regional Representatives

DAN BURGESS
Maine

PATRICK WOODCOCK
Massachusetts

DAVE ALTHOFF
Pennsylvania

MARY BETH TUNG
Maryland

MITCHELL SIMPSON
Arkansas

KENYA STUMP
Kentucky

MICHELLE GRANSEE
Minnesota

CHAD KRUSE
Illinois

MICHAEL FURZE
Washington

RICHARD STOVER
Idaho

EDDY TREVINO
Texas

DAN LLOYD
Montana

Affiliates' Co-Chairs
ANNE SMART
ChargePoint

HEATHER REAMS
Citizens for Responsible Energy Solutions

President
DAVID TERRY

General Counsel
JEFFREY C. GENZER

Category 3: Criteria and Metrics, Question a: How can eligible entities best assess, demonstrate, and articulate the degree to which they can leverage other funding to maximize impact?

NASEO encourages DOE to prioritize applications that integrate with or support the advancement of related clean energy programs (such as publicly-owned building retrofits, school energy efficiency improvements, home energy auditor training, state revolving loan funds for energy efficiency, energy efficiency and electrification residential rebates, and clean energy tax incentives, among others). In this way, DOE can use the Competitive Program to enable communities to better navigate the significant opportunities for investment being made available through the Infrastructure Investment and Jobs Act, Inflation Reduction Act, and continued state policies and investments in clean energy and energy efficiency.

Category 4: Reducing Administrative Burden, Question b. What measures could DOE take to minimize the burdens and barriers to recipients and their partners to apply for and manage awards, including through streamlining the application process; and are there examples of this being done successfully?

One potential avenue to reduce administrative burden on local recipients is to permit State Energy Offices to use their local suballocation funds (at least 60% of their total allocation) to provide shared grant-writing, grant-reporting, and program management services to communities in their state that may lack grants, program management, or development staff. This may take different forms, including hiring a staff person or consultant responsible for liaising with EECBG local government awardees; investing in reporting tools (for Davis Bacon, Buy American, National Environmental Policy Act Reviews) that can be made available at reduced costs or free-of-charge for multiple local government users; or offering programs administered at the state level that localities can elect to join in order to pursue commonly-held priorities and take advantage of economies of scale. In its EECBG program guidance, DOE should clarify whether localities can contribute funds from their formula or competitive allocations to participate in shared programs or services.

Thank you for your consideration of these comments.

Best regards,



David Terry, Executive Director