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HORNE Comment for Docket Number 22-DECARB-03 and EBD Program

Based on our review and understanding of CEC's draft documents, it seems that the current intent is to create a subrecipient relationship between CEC and its selected vendor. A subrecipient structure is not the most advantageous structure for CEC to administer this program. In fact, entities with the necessary resources, expertise and capacity will likely be unable to submit a proposal given some of the limitations of a subrecipient. It is suggested that, since this will be a competitive procurement, the subrecipient definition and contemplation is removed. We further suggest CEC consider a Third-Party Administrator procurement structure as this structure provides all of the same benefits to CEC as a subrecipient with additional benefits such as risk mitigation for CEC and additional flexibility for CEC's procured vendor. Under a sub recipient agreement CEC continues to have all the responsibilities of a grantee without the benefit of Third-Party support in administration. While a sub recipient does administration and delivery, overall grantee responsibilities remain fully concentrated at CEC. The Third-Party Administration model provides added capacity for grant administration plus direct delivery, thus providing the benefit of management support for CEC and the benefit of a sub recipient direct delivery component.