

## **NOTICE OF INTENTION TO AMEND THE CONFLICT OF INTEREST CODE OF THE SOUTHERN CALIFORNIA PUBLIC POWER AUTHORITY**

NOTICE IS HEREBY GIVEN that the **Southern California Public Power Authority**, pursuant to the authority vested in it by section 87306 of the Government Code, proposes amendment to its conflict of interest code. A comment period has been established commencing on February 18, 2025, and closing on April 4, 2025. All inquiries should be directed to the contact listed below.

The **Southern California Public Power Authority** proposes to amend its conflict of interest code to include employee positions that involve the making or participation in the making of decisions that may foreseeably have a material effect on any financial interest, as set forth in subdivision (a) of section 87302 of the Government Code. The amendment carries out the purposes of the law and no other alternative would do so and be less burdensome to affected persons.

Changes to the conflict of interest code include:

- (1) Updated list of designated positions to reflect classifications of SCPPA employees approved by the Southern California Public Power Authority Board of Directors through Resolution 2022-103, including: (a) abolishing the Website/Member Portal/Records Administrator/Graphics and Meeting/Training Coordinator positions; (b) combining the following positions into Technical Manager: Director, Resource and Program Development; Director, Asset Management and Special Project; Project Development Manager; Program Development Manager; Senior Project Manager; (c) removed "Regulatory" from Policy Analyst description and removed "State" from Government Affairs Manager title so that these positions may work on broader categories of issues; (d) created a tiered system for accounting, legal, utility analyst, and administrative roles to provide opportunities for promotion; (e) changed Human Resources and Officer Manager to Administrative Services Manager.
- (2) Updated disclosure categories for the following designated positions: (a) all previous titles consolidated into the Technical Manager title will now be subject to disclosure categories 1-7; and (b) the Government Affairs Manager disclosure categories will be expanded to categories 1-7.
- (3) Added the Canyon Project Management Committee to the list of designated positions subject to the Conflicts of Interest Code and applied disclosure categories 1-7 to Canyon Project Management Committee.
- (4) Listed additional officials who manage public investment.
- (5) Other technical changes.

Additional information on the code amendment, including copies of the code amendment, is available on the agency's intranet site and in person at 1160 Nicole Court, Glendora, CA 91740. The amendment is also attached to hereto.

Any interested person may submit written comments relating to the proposed amendment by submitting them no later than **April 4, 2025**, or at the conclusion of the public hearing, if requested, whichever comes later. Written comments may be provided to Southern California Public Power Authority by mailing physical copies to 1160 Nicole Court, Glendora, CA 91740 or by emailing

electronic copies to [legal@scppa.org](mailto:legal@scppa.org). At this time, no public hearing is scheduled. A person may request a hearing no later than **March 20, 2025**.

The **Southern California Public Power Authority** has determined that the proposed amendments:

1. Impose no mandate on local agencies or school districts.
2. Impose no costs or savings on any state agency.
3. Impose no costs on any local agency or school district that are required to be reimbursed under Part 7 (commencing with Section 17500) of Division 4 of Title 2 of the Government Code.
4. Will not result in any nondiscretionary costs or savings to local agencies.
5. Will not result in any costs or savings in federal funding to the state.
6. Will not have any potential cost impact on private persons, businesses or small businesses.

All inquiries concerning this proposed amendment and any communication required by this notice should be directed to: **Armando V. Arballo, Assistant General Counsel**, (626) 793-9364, [aarballo@scppa.org](mailto:aarballo@scppa.org).

## **CONFLICT OF INTEREST CODE FOR THE SOUTHERN CALIFORNIA PUBLIC POWER AUTHORITY**

The Political Reform Act (Government Code Section 81000, et seq.) requires state and local government agencies to adopt and promulgate conflict of interest codes. The Fair Political Practices Commission has adopted a regulation (2 Cal. Code of Reg. Sec. 18730) that contains the terms of a standard conflict of interest code, which can be incorporated by reference in an agency's code. After public notice and hearing, the standard code may be amended by the Fair Political Practices Commission to conform to amendments in the Political Reform Act. Therefore, the terms of 2 California Code of Regulations Section 18730 and any amendments to it duly adopted by the Fair Political Practices Commission are hereby incorporated by reference. This regulation and the attached Appendices, designating positions and establishing disclosure categories, shall constitute the conflict of interest code of the **Southern California Public Power Authority (Authority)**.

Individuals holding designated positions shall file their statements of economic interests with the **Authority**, which will make the statements available for public inspection and reproduction. (Gov. Code Section 81008.) All statements will be retained by the **Authority**.

**CONFLICT OF INTEREST CODE FOR THE  
SOUTHERN CALIFORNIA PUBLIC POWER AUTHORITY  
APPENDIX A-DESIGNATED POSITIONS**

<u>Designated Positions</u>	<u>Disclosure Categories</u>
Director, Government Affairs	1-7
General Counsel	1-7
Senior Assistant General Counsel	1-7
Assistant General Counsel	1-7
Technical Manager	1-7
Principal Utility Analyst	1-4
Senior Utility Analyst	1-4
Senior Utility Accountant	1-6
Utility Analyst	1-4
Utility Accountant	1-6
Government Affairs Manager	1-7
Policy Analyst	1-4
Administrative Services Manager	1
Administrator (All levels)	1
Canyon Project Management Committee	1-6
Consultants/New Positions	*

\*Consultants and new positions shall be included in the list of designated positions and shall disclose pursuant to the broadest disclosure category in the code subject to the following limitation:

The Executive Director may determine in writing that a particular consultant or new position, although a “designated position,” is hired to perform a range of duties that are limited in scope and thus is not required to comply fully with the disclosure requirements described in this section. Such written determination shall include a description of the duties of the consultant or new position and, based on that description, a statement to the extent of the disclosure requirements. The Executive Director’s determination is a public record and shall be retained for public inspection in the same manner and location as this conflict of interest code (Gov. Code Sec. 81008).

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**Officials Who Manage Public Investments**

The following positions are not covered by the conflict of interest code because they must file statements pursuant to Government Code Section 87200 and therefore, are listed for informational purposes only:

- Board of Directors and alternates
- Executive Director
- Chief Financial and Administrative Officer
- Investment Committee Members

An individual holding one of the above listed positions may contact the Fair Political Practices Commission for assistance or written advice regarding their filing obligations if they believe that their position has been categorized incorrectly. The Fair Political Practices Commission makes the final determination whether a position is covered by Government Code Section 87200.

**CONFLICT OF INTEREST CODE FOR THE  
SOUTHERN CALIFORNIA PUBLIC POWER AUTHORITY  
APPENDIX B-DISCLOSURE CATEGORIES**

**Category 1:** Investments and business positions in business entities and sources of income, including the receipt of gifts, loans, and travel payments from entities that provide services, including consulting services or supplies, materials, machinery, or equipment of the type utilized by the Authority.

**Category 2:** Investments and business positions in business entities and sources of income, including the receipt of gifts, loans, and travel payments from entities that are public or private electric utility companies or other companies which supply power to the Authority.

**Category 3:** Investments and business positions in business entities and sources of income, including the receipt of gifts, loans, and travel payments from entities that design, build, manufacture, sell, distribute or service equipment of the type that is either presently utilized by electric power suppliers or that is used by the federal, state, or local government or by private industry in research designed to refine or develop new methods of electrical power generation.

**Category 4:** Investments and business positions in business entities and sources of income, including the receipt of gifts, loans, and travel payments, from entities of the type that engage in land development, construction, or the acquisition, sale, lease or rental of real property, including but not limited to, real estate firms, title companies, escrow companies, appraisal services, survey firms, engineering services and consulting firms.

**Category 5:** Investments and business positions in business entities and sources of income, including the receipt of gifts, loans, and travel payments, from entities of the type that are engaged in the business of insurance, including, but not limited to, insurance companies, carriers, holding companies, underwriters, brokers, solicitors, agents, adjusters, claims managers and actuaries.

**Category 6:** Investments and business positions in business entities and sources of income, including the receipt of gifts, loans, and travel payments, from entities or persons who have filed a claim, or have a claim pending, against the Authority.

**Category 7:** All interests in real property located within the limits of the service territory of any public agency that is a member of the Authority. Real property outside the state of California is not required to be disclosed.