

**OG&E Code of Conduct
for the
2021-2022 Competitive Bidding Processes**

REQUIREMENTS

The Oklahoma Corporation Commission rules (OAC 165:35-34) specify certain requirements for electric utilities when a utility intends to propose its own self-bid in any competitive solicitation. Specifically, the Commission rules specify:

- The soliciting utility that intends to bid shall disclose publicly, in writing, the names and titles of the members of the affiliate's "Bid Team." The Bid Team develops the utility's own bid and, to assure fairness, is not involved, directly or indirectly, in the evaluation or selection of bids.
- Each soliciting utility shall disclose publicly, in writing, the names and titles of the members of its "Evaluation Team." The Evaluation Team evaluates bids, selects the successful bidder and, to assure fairness, is not involved, directly or indirectly, in the development of the utility's own bid.
- Each soliciting utility shall assure that the Bid Team and the Evaluation Team and any member of either do not engage in any communications, either directly or indirectly, regarding the RFP or the competitive bidding process (unless done as part of the bidding technical conferences open to all bidders).
- The soliciting utility and bidding affiliate shall execute an acknowledgement that the Bid Team and Evaluation Team have not and will not in the future so communicate, other than to submit and receive the bid at the appropriate time. The Bid Team and Evaluation Team may communicate as part of a bidding technical conference of which potential bidders or all actual bidders, if bids have already been submitted, are given adequate notice and opportunity to attend.

BID AND EVALUATION TEAMS

In compliance with the above requirements, OG&E has established Bid and Evaluation Teams. Any non-public communication about the RFP or competitive bidding process between the members of these two teams will be prohibited (unless those communications occur in an open and transparent way through questions and answers on the RFP technical website or as part of the bidding technical conferences open to all bidders). The Bid and Evaluation Teams are:

<u>BID TEAM</u>	<u>Title</u>
Robert Burch	VP, Utility Tech Services
Chris Lelak	Dir, Capital Projects
Steven Blansett	Mgr, Project Management
Ed Mayberry	Mgr, Power Supply Design Engineering
Steve Scott	Lead Commodity Manager
Taylor Weaver	Expert Project Manager
Mike Hixon	Mgr, Air Quality
Matt Grimes	Mgr. Water Quality / Operational Chemistry
Dominic Williams	Sr. Attorney
Danny Trent	Mgr, Fuels
Mary Bubliss	Mgr, Land Management
Eddie Hernandez	Sr. Transmission Planning Engineer

<u>EVALUATION TEAM</u>	
Mat Schuermann	VP, Power Supply and Resource Planning
Kelly Riley	Dir, Resource Planning
Zac Hager	Resource Planner Specialist
Aaron Castleberry	Resource Planner Specialist
Robert Doupe	Dir, Power Supply Services
Tony Shook	Dir, McClain, Mustang, Frontier Plants
Ryan Salisbury	Mgr, Maintenance Engineering Electrical
Ford Benham	Dir, Environmental Operations
Shad Sweeney	Mgr, Asset Condition
Bobby Lutz	Lead Project Manager
Jason Nations	Dir, Enterprise Security
George Bohn	Expert Engineer
Shawn McBroom	Sr. Mgr, Commercial Operations
Gary Boerger	Lead Transmission Planning Engineer
Brian Huckabay	Dir, Distribution Eng Tech Service
Dusty Nimmo	Dir, Supply Chain

ACCESS TO INFORMATION

OG&E shall take steps to ensure that any sensitive information of the Evaluation Team cannot be accessed by the Bid Team. Such sensitive information shall include evaluation criteria, other bidder information or bids, or bid analysis that is not provided to other bidders in an open and transparent way. No Bid Team member shall have access to any Evaluation Team files (electronic or paper) and shall not have access to any web-based data sharing site.

PROHIBITED DISCLOSURES

Evaluation Team members may not disclose to Bid Team members any sensitive information related to the RFP or competitive bid process, including evaluation criteria, other bidder information or bids, or bid analysis that is not provided to other bidders in an open and transparent way.

OUTSIDE CONSULTANTS

Each of the aforementioned teams may seek assistance from outside consultants or attorneys in preparing or evaluating bids. However, in no circumstances may the same individuals provide consulting or legal services to both the Bid Team and Evaluation Team. If the same consulting firm or law firm has separate individuals providing services to each team, the consulting team/law firm is required to maintain strict communication restrictions between those individuals and ensure that each individual cannot access each team's sensitive information or engage in prohibited disclosures.