

**OG&E Code of Conduct
for the
2024 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	Director, Capital Projects
Tony Shook	Dir, Power Plant Operations
Bobby Lutz	Sr. Mgr. Capital Projects
Casey Fuhrmann	Lead Project Manger
Ben Dickinson	Mgr, Planning and Design Engineering
Jason Mitchell	Lead Commodity Manager
David Bural	Lead Engineer
Sawyer Pehkonen	Engineer
Kali Cosgrove	Planning Engineer
Mary Bubliss	Land Management
Dominic Williams	Sr. Attorney
Gary Boerger	Expert Transmission Planning Engineer

<u>EVALUATION TEAM</u>	<u>Title</u>
Matt Schuermann	VP, Power Supply Operations
Kelly Riley	Director, Resource Planning
Aaron Castleberry	Resource Planner Expert
Aadarsh Bhetuwal	Resource Planner Associate
Ryan Forrest	Resource Planner
Jason Thomas	Senior Manager, Renewable Energy
Dusty Nimmo	Director, Supply Chain
Adam Snapp	Manager, Transmission Planning
Matt Johnson	Director, Corporate Tax
Clayton Churchwell	Lead Tax Accountant
Darrell Buck	Attorney
Brian McQuown	Environmental Regulatory Manager
Shawn McBroom	Senior Manager, Commercial Operation
Robert Doupe	Director, Power Supply Services
Chuck Walworth	Treasurer
Kelly Casey	Mgr. Project Management and Construction Services
Shad Sweeney	Manager Asset Condition
Ryan Salisbury	Mgr. Maintenance Engineering Electrical

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.