

October 27, 2021

The Honorable City Council  
c/o Holly Wolcott, City Clerk  
200 North Spring Street  
City Hall – 3rd Floor  
Los Angeles, CA 90012

**Re: Amended Conflict of Interests Code**  
Department of Water and Power

*FOR COUNCIL CONSIDERATION*  
Action Required by **January 25, 2022**

Dear Councilmembers:

Enclosed are proposed amendments to the conflict of interests (COI) code for the Department of Water and Power (DWP). As the City's code-reviewing body, the City Council must approve, revise, or return the proposed amendments within 90 days of the date they are received. Cal. Gov't Code §§ 82011(c), 87303. We recommend that you approve the amended COI code, which is provided in Attachments A through C.

**A. Background**

State law requires every City agency to adopt a COI code to help officials in the agency avoid financial conflicts of interest. Each COI code must identify the positions in the agency that have the authority to make or participate in government decisions, as well as the financial interests that must be reported on California Form 700 by the individuals who occupy those positions. Cal. Gov't Code §§ 87300, 87302(a). Agencies are required to amend their COI codes when changed circumstances make amendments necessary. Cal. Gov't Code § 87306.

**B. Code Elements**

A COI code consists of three sections: the incorporation and certification; a list of designated positions (schedule A); and a list of disclosure categories (schedule B). 2 Cal. Code Regs. §§ 18730(a)–18730(b)(3).

The incorporation and certification is a standardized introductory statement that briefly explains the function of the COI code, provides references to relevant sections of the California Political Reform Act and its regulations, and certifies that the entire COI code was approved by the City Council. The incorporation and certification is included in each agency's COI code.

Schedule A is a list of specific positions in the agency that have the authority to make or participate in making decisions that could foreseeably have an effect on a personal financial interest. Each position is assigned to a disclosure category, which is found in Schedule B. The

disclosure category is based on the position's type and level of decision-making authority and describes the types of investments, business positions, sources of income, and interests in real property that must be reported on a statement of economic interests (California Form 700).

### **C. Process**

DWP's existing COI code is provided in Attachment E. A number of staffing changes have occurred, and the code requires amendment to comply with state law and to ensure its accuracy. In consultation with the Ethics Commission and the City Attorney's Office, DWP's staff conducted a substantive review, and the amended code reflects the agency's current organizational structure and decision-making processes.

On February 13, 2018, a notice of intention to amend DWP's COI code was emailed to the staff and the unions that represent them, and it was posted on the public bulletin boards in City Hall and City Hall East. A 30-day comment period began on February 13, 2018 and ended on March 15, 2018. During the comment period, nine written comments were received. As a result of the written comments, changes were incorporated into DWP's proposed Schedule A. The written comments are provided in Attachment D. No requests for a public hearing were made during this comment period.

On January 4, 2019, a second notice of intention to amend DWP's COI code was emailed to the staff and the unions that represent them, incorporating changes made from the first comment period, and it was posted on the public bulletin boards in City Hall and City Hall East. A 30-day comment period began on January 4, 2019 and ended on February 4, 2019. During the comment period, nine written comments were received. As a result of the written comments, changes were incorporated into DWP's proposed Schedule A. The written comments are provided in Attachment D. No requests for a public hearing were made during this comment period.

On August 16, 2021, the third and final notice of intention to amend DWP's COI code was emailed to the staff and the unions that represent them, including the changes made to the proposed code as a result of the second public comment period, and it was posted on the public bulletin boards in City Hall and City Hall East. The final 30-day comment period began on August 16, 2021, and ended on September 15, 2021. During the comment period, six written comments were received. No additional changes were made to the proposed COI Code as a result of these comments. The written comments are provided in Attachment D. No requests for a public hearing were made during this comment period.

On October 12, 2021 the DWP governing board approved DWP's proposed COI Code, confirming that the Schedule A list of designated positions identifies all the individuals in DWP who are required by state law to file statements of economic interests and that the assigned disclosure categories accurately reflect the scope of each position's decision-making authority. Copies of the proposed schedules are provided in Attachments A and B.

**D. Conclusion**

On behalf of DWP, we urge you to approve its amended COI code, which is provided in Attachments A, B, and C. Under State law, City Council action on the amended code is required by January 25, 2022 (90 days after this transmittal is received).

If you have any questions, please contact Ethics Program Manager Samantha Rodriguez at (213) 978-1941.

Sincerely,

A handwritten signature in black ink, appearing to read "David Tristan". The signature is fluid and cursive, with the first name "David" and last name "Tristan" clearly distinguishable.

David Tristan  
Executive Director

*Attachments:*

- A. Proposed Schedule A – Designated Positions*
- B. Proposed Schedule B – Disclosure Categories*
- C. Incorporation and Certification*
- D. Public Comments*
- E. Current Agency COI Code*

cc: Assistant City Attorney Renee Stadel

City of Los Angeles  
**LOS ANGELES DEPARTMENT OF WATER AND POWER (LADWP)**  
*Conflict of Interests Code*  
**DESIGNATED POSITIONS**  
*(Schedule A)*

<b><u>Position Title</u></b>	<b><u>Disclosure Category</u></b>
Air Quality Group Manager	8
Architect	5, 11
Assistant Director Information Systems	8
Assistant General Manager	1
Assistant Retirement Plan Manager	1
Auditor Water and Power	1
Automotive Dispatcher	9
Board of Water and Power Commissioner	1
Building Repair Supervisor	15
Carpenter Supervisor	9
Chief Communications Operator	13
Chief Compliance Officer	8
Chief Electric Plant Operator	14
Chief Financial Officer	1
Chief Helicopter Pilot	8
Chief Investment Officer	*
Chief of Drafting Operations	2, 11
Chief Physician/Medical Director	8
Chief Real Estate Officer	1
Chief Safety Engineer Pressure Vessels	5, 11
Chief Security Officer	11
Civil Engineer	5, 11
Claims Agent	3, 11
Commercial Field Supervisor	14

Communications Electrician Supervisor – DDR 94-36117	11
Construction and Maintenance Superintendent	5, 11
Construction and Maintenance Supervisor	5, 11
Construction Equipment Service Supervisor	11
Consultant	**
Director of Efficiency Solutions	1
Director of Environmental Affairs	1
Director of Human Resources	1
Director of Legislative and Intergovernmental Affairs	1
Director of Power External Energy Resources	8
Director of Security Services	8
Electrical Engineer	5, 11
Electrical Mechanic Supervisor	13
Electrical Services Manager	8
Emergency Preparedness/Management Coordinator	2
Engineering Designer	5
Engineering Geologist	5, 11
Environmental Affairs Officer	1
Environmental Engineer	5
Environmental Supervisor	5, 11
Equipment Repair Supervisor	11
Equipment Specialist	2
Executive Assistant to the General Manager	1
Fleet Services Manager	8
Fuel and Purchased Power Manager	8
General Manager and Chief Engineer	1
General Services Manager	8
Graphics Supervisor	2
Head Custodian Supervisor	11

Industrial Chemist	5
Industrial Graphics Supervisor	2, 11
Information Services Specialist	9
Information Systems Manager	2, 14
Information Systems Operations Manager	13
Instrument Mechanic Supervisor	15
Investment Officer	1
IPP and Apex Operating Agent	8
Labor Supervisor	13
Lead Forward Marketer	5, 11
Legislative Representative	3
Management Analyst – CAO's and GM's Administrative Office	6
Management Analyst - EEOS	2
Management Analyst - SSD	2
Managing Water Utility Engineer	8
Material Testing Engineering Associate	12
Mechanical Engineer	5, 11
Mechanical Repair General Supervisor	13
Mid-Term Transaction Manager	5, 11
Millwright Supervisor	13
Natural Gas Procurement Supervisor	5, 11
Park Maintenance Supervisor	13
Power Engineering Manager	8
Principal Civil Engineering Drafting Technician	2, 11
Principal Clerk Personnel	4
Principal Clerk Utility – excludes ITSD	6
Principal Clerk Utility - ITSD	4
Principal Communications Operator	14
Principal Electric Trouble Dispatcher	6

Principal Electrical Engineering Drafting Technician	2, 11
Principal Mechanical Engineering Drafting Technician	2, 11
Principal Public Relations Representative	6
Principal Storekeeper	2
Principal Utility Accountant	8
Principal Utility Accountant-Retirement Plan Office	1
Principal Workers' Compensation Analyst	8
Programmer Analyst V – DDR 91-11019	2, 11
Property Manager	1
Public Relations Specialist	5
Rates Manager	8
Real Estate Officer	1
Retirement Board Member	*
Retirement Plan Manager	*
Risk Manager	5, 11
Safety Administrator	3
Safety Engineer	5
Secretary Water and Power Commission	2
Senior Architect	5
Senior Architectural Drafting Technician	2, 11
Senior Claims Representative	3
Senior Commercial Field Representative	10
Senior Communications Electrician Supervisor	2, 11
Senior Electrical Services Representative	8
Senior Electrical Mechanic Supervisor	13
Senior Electrical Repair Supervisor	13
Senior Gas Scheduler	5
Senior Hydrographer	13
Senior Industrial Hygienist	3, 11

Senior Machinist Supervisor	9
Senior Mechanical Engineering Drafting Technician	2
Senior Park Maintenance Supervisor	13
Senior Real Estate Officer	1
Senior Safety Engineer Pressure Vessels	14
Senior Storekeeper	2
Senior Survey Supervisor	15
Senior Systems Analyst	2, 11
Senior Underground Distribution Construction Supervisor	2, 11
Senior Utility Accountant	8
Senior Utility Buyer	1
Senior Utility Services Specialist	8
Senior Workers' Compensation Analyst	8
Shops Superintendent	6
Staff Assistant to General Manager	1
Standards of Conduct Chief Compliance Officer	8
Storekeeper	2
Stores Supervisor	8
Street Tree Superintendent	8
Structural Engineer	5, 11
Supervising Occupational Health Nurse	11
Supervising Water Service Representative	15
Supply Services Manager	1
Survey Party Chief	13
Systems Programmer III – DDR 94-11031	2, 11
Tire Repair Supervisor	13
Title Examiner	5
Transmission and Distribution Supervisor/Superintendent	15
Utility Accountant	8



Utility Administrator	8
Utility Buyer	2
Utility Services Investigator	3
Utility Services Manager	8
Utility Services Specialist	8
Water Quality Laboratory Manager	5, 11
Water Services Manager	8
Water Treatment Supervisor	15
Water Utility Operator Supervisor	13
Water Utility Superintendent	5, 11
Water Utility Supervisor	13
Waterworks Engineer	5, 11
Wholesale Energy Resource Management Section Manager	8
Workers' Compensation Analyst	8

\* Government Code Section 87200 requires that all filers in this classification disclose all investments, income, and interests in real property.

\*\* Consultants/New Positions are 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 General Manager and Chief Engineer may determine in writing that a particular consultant, although a "designated position," is hired to perform a range of duties that is limited in scope and thus is not required to fully comply with the disclosure requirements in this section. Such written determination shall include a description of the consultant's duties and, based upon that description, a statement of the extent of disclosure requirements. The General Manager and Chief Engineer's determination is a public record and shall be retained for public inspection in the same manner and location as this conflict of interests code. (Gov. Code Section 81008.)

City of Los Angeles  
**DEPARTMENT OF WATER AND POWER (DWP)**

*Conflict of Interests Code*  
**DISCLOSURE CATEGORIES**  
*(Schedule B)*

An individual whose position is identified in the Designated Positions section (Schedule A) of an agency's conflict of interests code is a filer and must disclose each economic interest identified below for the disclosure category associated with the individual's position. Disclosure must be made by filing the California Form 700 on specified schedules.

The definitions for investments, business positions, sources of income, interests in real property, doing business, gifts, and other terms may be found in the California Political Reform Act, its associated regulations, and the instructions for the California Form 700. The term "division" means a subset of the filer's agency and, depending on the agency's structure, may also be known as a department, group, office, section, or other similar term used to indicate a subordinate unit of the agency.

Economic interests must be disclosed for the applicable reporting period. In general, the following types of Form 700 filings have the following reporting periods:

Annual: January 1 through December 31 of the previous calendar year.

Assuming Office: the date the filer assumes office for investments, business positions, and interests in real property; for income, the 12 months immediately preceding the date the filer assumes office.

Leaving Office: the last date covered by the filer's most recent filing through the date the filer left the designated position.

Reporting periods may vary in individual circumstances and for other types of filings and should be verified with the Ethics Commission.

**Category 1**

Any investment, business position, source of income, or interest in real property.

**Category 2**

A. Any investment in, business position with, or income from a source that did any of the following:

1. Provides the type of services, goods, or equipment used by the filer's agency;
  2. Provided or sought to provide services, goods, or equipment to the filer's agency;
- or

3. Was a party or sought to become a party to a written agreement with the filer's agency.
- B. Any interest in real property that was involved in a contracting decision made by or pending with the filer's agency or is located within 500 feet of such property.
- C. Any investment in, business position with, or income from a source that rented, leased, subrented, sublet, purchased, or sold real property or facilities to or from the filer's agency.
- D. Any investment in, business position with, or income from a source that applied for or received a grant from or provided grant funding to the City when the filer's agency provided a review, recommendation, or referral.

### **Category 3**

- A. Any investment in, business position with, or income from a source that was involved as a party, participant, or representative in an investigative, enforcement, claim, litigation, regulatory, legislative, permitting, or licensing issue made by or pending with the filer's agency.
- B. Any interest in real property that was involved in an enforcement, regulatory, legislative, permitting, or licensing decision made by or pending with the filer's agency or is located within 500 feet of such property.

### **Category 4**

- A. Any income from an individual, or an immediate family member of an individual, who was employed by or applied for any position within the filer's agency.
- B. Any investment in, business position with, or income from a source that represented or sought to represent an employee or group of employees in the filer's agency.
- C. Any investment in, business position with, or income from a source that did any of the following:
  1. Provides the type of services, goods, or equipment used by the filer's division;
  2. Provided or sought to provide services, goods, or equipment to the filer's division;  
or
  3. Was a party or sought to become a party to a written agreement with the filer's division.
- D. Any investment in, business position with, or income from a source that provided or sought to provide benefits, services, goods, or equipment to the filer's agency or its employees when the filer's division provided a review, recommendation, or referral.

### **Category 5**

- A. Any investment in, business position with, or income from a source that did any of the following:
  - 1. Provides the type of services, goods, or equipment used by the filer's agency;
  - 2. Provided or sought to provide services, goods, or equipment to the filer's agency;  
or
  - 3. Was a party or sought to become a party to a written agreement with the filer's agency.
- B. Any interest in real property that was involved in a contracting decision made by or pending with the filer's agency or is located within 500 feet of such property.
- C. Any investment in, business position with, or income from a source that rented, leased, subrented, sublet, purchased, or sold real property or facilities to or from the filer's agency.
- D. Any investment in, business position with, or income from a source that applied for or received a grant from or provided grant funding to the City when the filer's agency provided a review, recommendation, or referral.
- E. Any investment in, business position with, or income from a source that was involved as a party, participant, or representative in an investigative, enforcement, claim, litigation, regulatory, legislative, permitting, or licensing issue made by or pending with the filer's agency.
- F. Any interest in real property that was involved in an enforcement, regulatory, legislative, permitting, or licensing decision made by or pending with the filer's agency or is located within 500 feet of such property.

## **Category 6**

- A. Any investment in, business position with, or income from a source that did any of the following:
  - 1. Provides the type of services, goods, or equipment used by the filer's agency;
  - 2. Provided or sought to provide services, goods, or equipment to the filer's agency;  
or
  - 3. Was a party or sought to become a party to a written agreement with the filer's agency.
- B. Any interest in real property that was involved in a contracting decision made by or pending with the filer's agency or is located within 500 feet of such property.
- C. Any investment in, business position with, or income from a source that rented, leased, subrented, sublet, purchased, or sold real property or facilities to or from the filer's agency.

- D. Any investment in, business position with, or income from a source that applied for or received a grant from or provided grant funding to the City when the filer's agency provided a review, recommendation, or referral.
- E. Any income from an individual, or an immediate family member of an individual, who was employed by or applied for any position within the filer's agency.
- F. Any investment in, business position with, or income from a source that represented or sought to represent an employee or group of employees in the filer's agency.
- G. Any investment in, business position with, or income from a source that provided or sought to provide benefits, services, goods, or equipment to the filer's agency or its employees when the filer's division provided a review, recommendation, or referral.

### **Category 7**

- A. Any investment in, business position with, or income from a source that was involved as a party, participant, or representative in an investigative, enforcement, claim, litigation, regulatory, legislative, permitting, or licensing issue made by or pending with the filer's agency.
- B. Any interest in real property that was involved in an enforcement, regulatory, legislative, permitting, or licensing decision made by or pending with the filer's agency or is located within 500 feet of such property.
- C. Any income from an individual, or an immediate family member of an individual, who was employed by or applied for any position within the filer's agency.
- D. Any investment in, business position with, or income from a source that represented or sought to represent an employee or group of employees in the filer's agency.
- E. Any investment in, business position with, or income from a source that did any of the following:
  - 1. Provides the type of services, goods, or equipment used by the filer's division;
  - 2. Provided or sought to provide services, goods, or equipment to the filer's division;  
or
  - 3. Was a party or sought to become a party to a written agreement with the filer's division.
- F. Any investment in, business position with, or income from a source that provided or sought to provide benefits, services, goods, or equipment to the filer's agency or its employees when the filer's division provided a review, recommendation, or referral.

### **Category 8**

- A. Any investment in, business position with, or income from a source that did any of the following:

1. Provides the type of services, goods, or equipment used by the filer's agency;
  2. Provided or sought to provide services, goods, or equipment to the filer's agency;  
or
  3. Was a party or sought to become a party to a written agreement with the filer's agency.
- B. Any interest in real property that was involved in a contracting decision made by or pending with the filer's agency or is located within 500 feet of such property.
- C. Any investment in, business position with, or income from a source that rented, leased, subrented, sublet, purchased, or sold real property or facilities to or from the filer's agency.
- D. Any investment in, business position with, or income from a source that applied for or received a grant from or provided grant funding to the City when the filer's agency provided a review, recommendation, or referral.
- E. Any investment in, business position with, or income from a source that was involved as a party, participant, or representative in an investigative, enforcement, claim, litigation, regulatory, legislative, permitting, or licensing issue made by or pending with the filer's agency.
- F. Any interest in real property that was involved in an enforcement, regulatory, legislative, permitting, or licensing decision made by or pending with the filer's agency or is located within 500 feet of such property.
- G. Any income from an individual, or an immediate family member of an individual, who was employed by or applied for any position within the filer's agency.
- H. Any investment in, business position with, or income from a source that represented or sought to represent an employee or group of employees in the filer's agency.
- I. Any investment in, business position with, or income from a source that provided or sought to provide benefits, services, goods, or equipment to the filer's agency or its employees when the filer's division provided a review, recommendation, or referral.

### **Category 9**

- A. Any investment in, business position with, or income from a source that did any of the following:
1. Provides the type of services, goods, or equipment used by the filer's division;
  2. Provided or sought to provide services, goods, or equipment to the filer's division;  
or
  3. Was a party or sought to become a party to a written agreement with the filer's division.

- B. Any interest in real property that was involved in a contracting decision made by or pending with the filer's division or is located within 500 feet of such property.
- C. Any investment in, business position with, or income from a source that rented, leased, subrented, sublet, purchased, or sold real property or facilities to or from the City when the filer's division provided a review, recommendation, or referral.
- D. Any investment in, business position with, or income from a source that applied for or received a grant from or provided grant funding to the City when the filer's division provided a review, recommendation, or referral.

#### **Category 10**

- A. Any investment in, business position with, or income from a source that was involved as a party, participant, or representative in an investigative, enforcement, claim, litigation, regulatory, legislative, permitting, or licensing issue made by or pending with the filer's division.
- B. Any interest in real property that was involved in an enforcement, regulatory, legislative, permitting, or licensing decision made by or pending with the filer's division or is located within 500 feet of such property.

#### **Category 11**

- A. Any income from an individual, or immediate family member of an individual, who was employed by or applied for any position with the filer's agency when the filer's division provided a review, recommendation, or referral.
- B. Any investment in, business position with, or income from a source that represented or sought to represent an employee or group of employees and for whom the filer's division provided a review, recommendation, or referral.
- C. Any investment in, business position with, or income from a source that did any of the following:
  - 1. Provides the type of services, goods, or equipment used by the filer's division;
  - 2. Provided or sought to provide services, goods, or equipment to the filer's division;  
or
  - 3. Was a party or sought to become a party to a written agreement with the filer's division.
- D. Any investment in, business position with, or income from a source that provided or sought to provide benefits, services, goods, or equipment to the filer's agency or its employees when the filer's division provided a review, recommendation, or referral.

#### **Category 12**

- A. Any investment in, business position with, or income from a source that did any of the following:
  - 1. Provides the type of services, goods, or equipment used by the filer's division;
  - 2. Provided or sought to provide services, goods, or equipment to the filer's division;  
or
  - 3. Was a party or sought to become a party to a written agreement with the filer's division.
- B. Any interest in real property that was involved in a contracting decision made by or pending with the filer's division or is located within 500 feet of such property.
- C. Any investment in, business position with, or income from a source that rented, leased, subrented, sublet, purchased, or sold real property or facilities to or from the filer's agency when the filer's division provided a review, recommendation, or referral.
- D. Any investment in, business position with, or income from a source that applied for or received a grant from or provided grant funding to the City when the filer's division provided a review, recommendation, or referral.
- E. Any investment in, business position with, or income from a source that was involved as a party, participant, or representative in an investigative, enforcement, claim, litigation, regulatory, legislative, permitting, or licensing issue made by or pending with the filer's division.
- F. Any interest in real property that was involved in an enforcement, regulatory, legislative, permitting, or licensing decision made by or pending with the filer's division or is located within 500 feet of such property.

### **Category 13**

- A. Any investment in, business position with, or income from a source that did any of the following:
  - 1. Provides the type of services, goods, or equipment used by the filer's division;
  - 2. Provided or sought to provide services, goods, or equipment to the filer's division;  
or
  - 3. Was a party or sought to become a party to a written agreement with the filer's division.
- B. Any interest in real property that was involved in a contracting decision made by or pending with the filer's division or is located within 500 feet of such property.
- C. Any investment in, business position with, or income from a source that rented, leased, subrented, sublet, purchased, or sold real property or facilities to or from the



filer's agency when the filer's division provided a review, recommendation, or referral.

- D. Any investment in, business position with, or income from a source that applied for or received a grant from or provided grant funding to the City when the filer's division provided a review, recommendation, or referral.
- E. Any income from an individual, or immediate family member of an individual, who was employed by or applied for any position with the filer's agency when the filer's division provided a review, recommendation, or referral.
- F. Any investment in, business position with, or income from a source that represented or sought to represent an employee or group of employees and for whom the filer's division provided a review, recommendation, or referral.
- G. Any investment in, business position with, or income from a source that provided or sought to provide benefits, services, goods, or equipment to the filer's agency or its employees when the filer's division provided a review, recommendation, or referral.

#### **Category 14**

- A. Any investment in, business position with, or income from a source that was involved as a party, participant, or representative in an investigative, enforcement, claim, litigation, regulatory, legislative, permitting, or licensing issue made by or pending with the filer's division.
- B. Any interest in real property that was involved in an enforcement, regulatory, legislative, permitting, or licensing decision made by or pending with the filer's division or is located within 500 feet of such property.
- C. Any income from an individual, or immediate family member of an individual, who was employed by or applied for any position with the filer's agency when the filer's division provided a review, recommendation, or referral.
- D. Any investment in, business position with, or income from a source that did any of the following:
  - 1. Provides the type of services, goods, or equipment used by the filer's division;
  - 2. Provided or sought to provide services, goods, or equipment to the filer's division;  
or
  - 3. Was a party or sought to become a party to a written agreement with the filer's division.
- E. Any investment in, business position with, or income from a source that represented or sought to represent an employee or group of employees and for whom the filer's division provided a review, recommendation, or referral.

- F. Any investment in, business position with, or income from a source that provided or sought to provide benefits, services, goods, or equipment to the filer's agency or its employees when the filer's division provided a review, recommendation, or referral.

### **Category 15**

- A. Any investment in, business position with, or income from a source that did any of the following:
1. Provides the type of services, goods, or equipment used by the filer's division;
  2. Provided or sought to provide services, goods, or equipment to the filer's division;  
or
  3. Was a party or sought to become a party to a written agreement with the filer's division.
- B. Any interest in real property that was involved in a contracting decision made by or pending with the filer's division or is located within 500 feet of such property.
- C. Any investment in, business position with, or income from a source that rented, leased, subrented, sublet, purchased, or sold real property or facilities to or from the filer's agency when the filer's division provided a review, recommendation, or referral.
- D. Any investment in, business position with, or income from a source that applied for or received a grant from or provided grant funding to the City when the filer's division provided a review, recommendation, or referral.
- E. Any investment in, business position with, or income from a source that was involved as a party, participant, or representative in an investigative, enforcement, claim, litigation, regulatory, legislative, permitting, or licensing issue made by or pending with the filer's division.
- F. Any interest in real property that was involved in an enforcement, regulatory, legislative, permitting, or licensing decision made by or pending with the filer's division or is located within 500 feet of such property.
- G. Any income from an individual, or immediate family member of an individual, who was employed by or applied for any position with the filer's agency when the filer's division provided a review, recommendation, or referral.
- H. Any investment in, business position with, or income from a source that represented or sought to represent an employee or group of employees and for whom the filer's division provided a review, recommendation, or referral.
- I. Any investment in, business position with, or income from a source that provided or sought to provide benefits, services, goods, or equipment to the filer's agency or its employees when the filer's division provided a review, recommendation, or referral.

### **Category 16**

- A. Any income from an individual, or an immediate family member of an individual, who was employed by or applied for any position within the City when the filer's division provided a review, recommendation, or referral.
- B. Any investment in, business position with, or income from a source that represented or sought to represent an employee or group of employees and for whom the filer's division provided a review, recommendation, or referral.
- C. Any investment in, business position with, or income from a source that did any of the following:
  - 1. Provides the type of services, goods, or equipment used by the filer's division;
  - 2. Provided or sought to provide services, goods, or equipment to the filer's division;  
or
  - 3. Was a party or sought to become a party to a written agreement with the filer's division.
- D. Any investment in, business position with, or income from a source that provided or sought to provide benefits, services, goods, or equipment to City employees and for which the filer's division provided a review, recommendation, or referral.
- E. Any investment in, business position with, or income from a source that was involved as a party, participant, or representative in a personnel, investigative, enforcement, claim, or litigation matter that involved the filer's division.

### **Category 17**

- A. Any investment in, business position with, or income from a source that was involved as a party, participant, or representative in an investigative, enforcement, claim, litigation, regulatory, legislative, permitting, or licensing issue made by or pending with the filer's agency.
- B. Any interest in real property that was involved in an enforcement, regulatory, legislative, permitting, or licensing decision made by or pending with the filer's agency or is located within 500 feet of such property.
- C. Any investment in, business position with, or income from a source that did any of the following:
  - 1. Provides the type of services, goods, or equipment used by the filer's division;
  - 2. Provided or sought to provide services, goods, or equipment to the filer's division;  
or
  - 3. Was a party or sought to become a party to a written agreement with the filer's division.

- D. Any interest in real property that was involved in a contracting decision made by or pending with the filer's division or is located within 500 feet of such property.
- E. Any investment in, business position with, or income from a source that rented, leased, subrented, sublet, purchased, or sold real property or facilities to or from the filer's agency when the filer's division provided a review, recommendation, or referral.
- F. Any investment in, business position with, or income from a source that applied for or received a grant from or provided grant funding to the City when the filer's division provided a review, recommendation, or referral.

### **Category 18**

- A. Any income from an individual, or an immediate family member of an individual, who was employed by or applied for any position within the filer's agency.
- B. Any investment in, business position with, or income from a source that represented or sought to represent an employee or group of employees in the filer's agency.
- C. Any investment in, business position with, or income from a source that did any of the following:
  - 1. Provides the type of services, goods, or equipment used by the filer's division;
  - 2. Provided or sought to provide services, goods, or equipment to the filer's division;  
or
  - 3. Was a party or sought to become a party to a written agreement with the filer's division.
- D. Any investment in, business position with, or income from a source that provided or sought to provide benefits, services, goods, or equipment to the filer's agency or its employees when the filer's division provided a review, recommendation, or referral.
- E. Any interest in real property that was involved in a contracting decision made by or pending with the filer's division or is located within 500 feet of such property.
- F. Any investment in, business position with, or income from a source that rented, leased, subrented, sublet, purchased, or sold real property or facilities to or from the filer's agency when the filer's division provided a review, recommendation, or referral.
- G. Any investment in, business position with, or income from a source that applied for or received a grant from or provided grant funding to the City when the filer's division provided a review, recommendation, or referral.

**LOS ANGELES DEPARTMENT OF WATER AND POWER  
(LADWP)  
CITY OF LOS ANGELES**

CONFLICT OF INTERESTS CODE  
Incorporation and Certification  
Page 1 of 2

Effective Date: \_\_\_\_\_  
Council File No. \_\_\_\_\_

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**INCORPORATION**

The Political Reform Act of 1974 (PRA) requires state and local government agencies to adopt and promulgate conflict of interests codes to help government employees avoid financial conflicts. See California Government Code sections 81000 *et seq.*

The Fair Political Practices Commission (FPPC) has adopted a regulation that contains the terms of a standard conflict of interests code, can be incorporated by reference, and may be amended by the FPPC to conform to amendments to the PRA after public notice and hearings. This agency's conflict of interests code incorporates by reference that regulation (2 California Code of Regulations section 18730); the attached Schedule A, which identifies each position in the agency that is charged with making or participating in making a government decision; and the attached Schedule B, which identifies the economic interests that the individuals in those designated positions must disclose.

City officials (individuals holding, elected to, or appointed to a position in Schedule A) must periodically submit statements of economic interests that disclose the economic interests in Schedule B that they held during the reporting period. The statements must be submitted to the Ethics Commission, which makes the statements available for public inspection and reproduction (see California Government Code section 81008).

City officials are required to comply with the requirements of their agency's code and the requirements of state and City law.

**LOS ANGELES DEPARTMENT OF WATER AND POWER  
(LADWP)  
CITY OF LOS ANGELES**

CONFLICT OF INTERESTS CODE  
Incorporation and Certification  
Page 2 of 2

Effective Date: \_\_\_\_\_  
Council File No. \_\_\_\_\_

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**CERTIFICATION**

This code accurately designates all positions in the agency that make or participate in the making of governmental decisions. The disclosure category assigned to each position accurately requires individuals who hold the position to report their investments, business positions, interests in real property, and sources of income that could foreseeably be materially affected by the City decisions they make or participate in making. This code was approved by the agency's general manager or its governing board or commission on

\_\_\_\_\_  
October 12, 2021  
(Date)

BY \_\_\_\_\_  
Martin L. Adams

\_\_\_\_\_  
General Manager and Chief Engineer  
(Title)

\_\_\_\_\_  
10/18/21  
(Date)

City of Los Angeles  
**LOS ANGELES DEPARTMENT OF WATER AND POWER (LADWP)**  
Proposed Conflict of Interest Code  
PUBLIC WRITTEN COMMENTS RECEIVED

1ST PUBLIC COMMENT PERIOD FEBRUARY 13, 2018 THROUGH MARCH 15, 2018			
	DATE RECEIVED	FROM	CHANGES INCLUDED IN 2ND PUBLICLY-POSTED PROPOSED COIC
1	02/13/18	CHAVEZ, CAROL	EMPLOYEE'S QUESTION WAS NOT COIC-RELATED BUT HER POSITION TITLE, BUT HER POSITION TITLE - <b>SECRETARY LEGAL</b> , WAS IN-PROCESS OF BEING EVALUATED; AND WAS <b>DELETED/NOT INCLUDED IN 2ND PROPOSED COIC (AS A SECRETARIAL POSITION, IT DID NOT MEET THE 2ND PROPOSED COIC'S DECISION/RECOMMENDATION-MAKING THRESHOLD).</b>
2	02/13/18	MCCABE, KEITH	NO CHANGE. WAS RESENT 5/3/18 AND 6/7/18. LADWP ETHICS LIAISON RESPONDED TO EMPLOYEE'S INFORMATION REQUEST.
3	02/13/18	HERRINGTON, JAMES	NO CHANGE. WAS RESENT 2/26/18. STOREKEEPER POSITION TITLE CONTINUES TO BE INCLUDED IN LADWP'S PROPOSED COIC AS IT MEETS THE CURRENT PROPOSED COIC'S DECISION/RECOMMENDATION-MAKING THRESHOLD.
4	02/14/18	MOHAMMAD, SVETLANA	NO CHANGE. NO RESPONSE AS NOT RELEVANT TO COIC.
5	02/14/18	RUBIN, MARK	<b>MANAGEMENT ANALYST</b> POSITION TITLE CONTINUED TO BE INCLUDED IN 2ND PROPOSED COIC, BUT <b>WAS CHANGED IN 3RD PROPOSED COIC TO ONLY INCLUDE CERTAIN POSITIONS (BY DIVISION/OFFICE; ONLY THOSE THAT MEET THE CURRENT PROPOSED COIC'S DECISION/RECOMMENDATION-MAKING THRESHOLD).</b>
6	02/14/18	TORRES, IDA	NO CHANGE. LADWP ETHICS LIAISON RESPONDED TO EMPLOYEE'S QUESTION.
7	02/21/18	ELMAN, CECILIA	<b>SYSTEMS ANALYST</b> POSITION TITLE CONTINUED TO BE INCLUDED IN 2ND PROPOSED COIC, BUT <b>WAS DELETED/NOT INCLUDED IN 3RD PROPOSED COIC AS IT DID NOT MEET THE 3RD PROPOSED COIC'S DECISION/RECOMMENDATION-MAKING/THRESHOLD.</b>
8	02/22/18	COSIA-GARCIA, NORMA	NO CHANGE. SUPPLY SERVICES MANAGER CONTINUES TO BE INCLUDED IN PROPOSED COIC; AND WAREHOUSE & TOOLROOM WORKER (CIVIL SERVICE CLASS TITLE) AND PURCHASING CARD HOLDER , RFP RATERS AND OTHER WORK ROLES WILL BE EVALUATED IN LADWP'S NEXT BIENNIAL COIC UPDATE (TO BE COMPLETED AFTER THE CURRENT PROPOSED COIC IS EFFECTUATED).
9	03/04/18	SOLOMON, WILLIAM	<b>SENIOR ELECTRIC TROUBLE DISPATCHER POSITION TITLE DELETED/NOT INCLUDED IN 2ND PROPOSED COIC AS IT DID NOT MEET THE 2ND PROPOSED COIC'S DECISION/RECOMMENDATION-MAKING THRESHOLD/CRITERIA.</b>
2ND PUBLIC COMMENT PERIOD JANUARY 4, 2019 THROUGH FEBRUARY 4, 2019			
	DATE RECEIVED	FROM	CHANGES INCLUDED IN 3RD PUBLICLY-POSTED PROPOSED COIC
1	01/04/19	LE, LINDA	<b>RETIREMENT PLAN OFFICE'S PRINCIPAL UTILITY ACCOUNTANT POSITION ADDED SEPARATELY IN 3RD PROPOSED COIC WITH DISCLOSURE CATEGORY 1 AS IT HAS HIGHER/BROADER DECISION/RECOMMENDATION-MAKING THRESHOLD/CRITERIA THAN OTHER LADWP PRINCIPAL UTILITY ACCOUNTANT POSITIONS.</b> NO CHANGE TO ASSISTANT RETIREMENT PLAN MANAGER AND INVESTMENT OFFICER AS THEY DO NOT MEET 87200 FILER CRITERIA.
2	01/07/19	LAU, CHESTER	NO CHANGE. LADWP ETHICS LIAISON RESPONDED TO EMPLOYEE'S QUESTION.

3	01/08/19	CATSOULAS, MIKE	SAFETY ENGINEER PRESSURE VESSELS POSITION TITLE DELETED/NOT INCLUDED IN 3RD PROPOSED COIC AS IT DID NOT MEET THE 3RD PROPOSED COIC'S DECISION/RECOMMENDATION-MAKING THRESHOLD/CRITERIA. NO CHANGE TO SENIOR SAFETY ENGINEER PRESSURE VESSELS POSITION TITLE AS IT CONTINUED TO MEET THE 3RD PROPOSED COIC'S DECISION/RECOMMENDATION MAKING THRESHOLD/CRITERIA.
4	01/15/19	LEW, KELVIN	DISCLOSURE CATEGORIES WERE CHANGED FOR 3-POSITION TITLES IN THE 3RD PROPOSED COIC TO ALIGN THEM WITH THEIR DECISION/RECOMMENDATION-MAKING THRESHOLD/CRITERIA: DIRECTOR OF EFFICIENCY SOLUTIONS AND DIRECTOR OF ENVIRONMENTAL AFFAIRS CHANGED FROM 8 TO 1; AND ENVIRONMENTAL SUPERVISOR CHANGED FROM 5 TO 5, 11. 3-POSITION TITLES WERE DELETED/NOT INCLUDED IN 3RD PROPOSED COIC AS THEY DID NOT MEET THE 3RD PROPOSED COIC'S DECISION/RECOMMENDATION-MAKING THRESHOLD/CRITERIA: ENGINEERING GEOLOGIST ASSOCIATE, ENVIRONMENTAL SPECIALIST, AND INDUSTRIAL HYGIENIST.
5	02/01/19	GONZALEZ, JOSEPHINE	NO CHANGE TO ENVIRONMENTAL AFFAIRS OFFICER'S ASSIGNED DISCLOSURE CATEGORY BUT CONCERNS WERE RELATED TO THOSE PREVIOUSLY RAISED IN KELVIN LEW'S COMMENT RECEIVED 01/15/19.
6	02/02/19	DAVIS, CRAIG	NO CHANGE. LADWP ETHICS LIAISON RESPONDED TO EMPLOYEE'S QUESTION.
<b>3RD PUBLIC COMMENT PERIOD AUGUST 16, 2021 THROUGH SEPTEMBER 15, 2021</b>			
	DATE RECEIVED	FROM	CHANGES REQUIRED AFTER 3RD PUBLICLY-POSTED PROPOSED COIC
1	08/13/21	HYBARGER, ASYA	NO CHANGE. LADWP ETHICS LIAISON RESPONDED TO EMPLOYEE'S QUESTION.
2	08/13/21	KLEIN, GEORGE	NO CHANGE. ONLY EMPLOYEES THAT OCCUPY PROGRAMMER ANALYST V/DDR 91-11019 POSITIONS WILL BE INCLUDED IN FUTURE PROPOSED COIC EMAIL DISTRIBUTIONS.
3	08/16/21	GILBERT, GARY	NO CHANGE. LADWP ETHICS LIAISON RESPONDED TO EMPLOYEE'S QUESTIONS.
4	08/17/21	ALVELAIS, LUCIA	NO CHANGE. LADWP ETHICS LIAISON RESPONDED TO EMPLOYEE'S CLARIFICATION REQUEST.
5	08/17/21	NEGRETE, ASHLEY	NO CHANGE. LADWP ETHICS LIAISON RESPONDED TO EMPLOYEE'S QUESTIONS.
6	08/18/21	TIEMAN, ESTELA	NO CHANGE. LADWP RESPONDED TO EMPLOYEE'S QUESTIONS. COMMERCIAL SERVICE SUPERVISOR (CIVIL SERVICE CLASS TITLE) CONTINUES TO BE INCLUDED IN PROPOSED COIC; AND CUSTOMER SERVICE SUPERVISOR (WORKING TITLE) CONTINUES TO NOT BE INCLUDED AS IT DOES NOT MEET THE CURRENT PROPOSED COIC'S DECISION/RECOMMENDATION MAKING THRESHOLD/CRITERIA.
7	08/19/21	KALOUMAIRA, APRIL	NO CHANGE. LADWP RESPONDED TO EMPLOYEE'S QUESTIONS. SENIOR ARCHITECTURAL DRAFTING TECHNICIAN CONTINUES IN PROPOSED COIC AS IT MEETS THE CURRENT PROPOSED COIC'S DECISION/RECOMMENDATION-MAKING THRESHOLD/CRITERIA; AND CIVIL/MECHANICAL/ELECTRICAL ENGINEERING ASSOCIATE TITLES CONTINUE TO NOT BE INCLUDED AS THEY DO NOT MEET THE SAME CURRENT PROPOSED COIC'S DECISION/RECOMMENDATION-MAKING THRESHOLD/CRITERIA.
8	08/20/21	LAW, ANTHONY	NO CHANGE. LADWP ETHICS LIAISON RESPONDED TO EMPLOYEE'S QUESTION.
9	08/25/21	MENDEZ, VERONICA	NO CHANGE. LADWP ETHICS LIAISON RESPONDED TO EMPLOYEE'S QUESTION.
10	08/31/21	NWOSU, TIA	NO CHANGE. LADWP ETHICS LIAISON RESPONDED TO EMPLOYEE'S QUESTION.

POSITION TITLE CHANGED

POSITION TITLE DELETED



**From:** [Chavez, Carol](#)  
**To:** [Ethics](#)  
**Subject:** Question  
**Date:** Tuesday, February 13, 2018 3:49:23 PM

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Good Afternoon,

I wanted to ask a question about employees who participate in direct sales, such as Avon, Tupperware, etc. If any employee decided to participate as a direct sales representative/salesperson, would that information need to be disclosed to the Department?

Thank you for your time and for your anticipated response to my question.

Best,  
Carol Chavez



**From:** [McCabe, Keith](#)  
**To:** [Ethics](#)  
**Cc:** [McCabe, Keith](#)  
**Subject:** RE: LADWP's Public Notice of Proposed Conflict of Interest (COI) Code Update to Impacted LADWP Employees  
**Date:** Thursday, June 7, 2018 1:15:25 PM

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Please provide your written explanation for the disclosure designations and responsibilities.

Keith J. McCabe  
Los Angeles Department of Water and Power  
[REDACTED]

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**From:** McCabe, Keith  
**Sent:** Thursday, May 3, 2018 5:39 AM  
**To:** Ethics  
**Cc:** McCabe, Keith  
**Subject:** RE: LADWP's Public Notice of Proposed Conflict of Interest (COI) Code Update to Impacted LADWP Employees

Please provide your written explanation for the disclosure designations and responsibilities.

Keith J. McCabe  
Los Angeles Department of Water and Power  
[REDACTED]

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**From:** McCabe, Keith  
**Sent:** Tuesday, February 13, 2018 1:58 PM  
**To:** Ethics  
**Cc:** McCabe, Keith  
**Subject:** RE: LADWP's Public Notice of Proposed Conflict of Interest (COI) Code Update to Impacted LADWP Employees

Please provide your written explanation for the disclosure designations and responsibilities.

Keith J. McCabe  
Los Angeles Department of Water and Power  
[REDACTED]

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**From:** Ethics  
**Sent:** Tuesday, February 13, 2018 1:34 PM  
**Subject:** LADWP's Public Notice of Proposed Conflict of Interest (COI) Code Update to Impacted LADWP Employees

Pursuant to the Political Reform Act, the Los Angeles Department of Water and Power (LADWP) announces that it intends to update LADWP's Conflict of Interest (COI) Code. This electronic announcement serves as LADWP's required public notice to those that may be impacted by the COI

Code update - all current or proposed designated employees and their employee-representing entities. This announcement begins a thirty (30) day comment period during which employees, their representing entities and the public may provide comments to LADWP as set forth below.

The following documents are attached to this electronic announcement and posted to the MyDWP home page – go to the “Quick Links” and click on “Conflict of Interest (COI) Code Update”:

- Conflict of Interest (COI) Code FAQ
- Notice of Intention
- Current COI Code
- Proposed Schedule A
- Proposed Schedule B
- Deleted Positions Form

Comments and concerns may be submitted in writing only to LADWP via email at [REDACTED] or through U.S. mail to the Los Angeles Department of Water and Power, Chief Operating Officer’s Office, Attention: LADWP Ethics Liaison, [REDACTED]. Written concerns must be received by end of business on Thursday, March 15, 2018. LADWP will evaluate all timely-received written concerns before the COI Code is approved.

The LADWP appreciates your cooperation as we continue to move forward to update the COI Code.

**From:** [Herrington, James](#)  
**To:** [Ethics](#)  
**Subject:** FW: Objection to Inclusion of My Storekeeper Position for Financial and Pecuniary Conflict of Interest Disclosure Requirements (i.e. Completion of Form 700)  
**Date:** Monday, February 26, 2018 12:14:26 PM

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**From:** Herrington, James  
**Sent:** Wednesday, February 14, 2018 6:01 AM  
**To:** [REDACTED]  
**Subject:** FW: Objection to Inclusion of My Storekeeper Position for Financial and Pecuniary Conflict of Interest Disclosure Requirements (i.e. Completion of Form 700)

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**From:** Davis, Ronald B.  
**Sent:** Wednesday, February 14, 2018 5:18 AM  
**To:** Herrington, James  
**Cc:** Cosio-Garcia, Norma; Garcia, Sandra  
**Subject:** RE: Objection to Inclusion of My Storekeeper Position for Financial and Pecuniary Conflict of Interest Disclosure Requirements (i.e. Completion of Form 700)

Jim,  
Since each individual employee is offered a chance to express his or her concerns, you should forward your particular concerns to [REDACTED]

**Ron Davis**  
**Supply Chain Services – Materials Management**  
**Coding Unit**

[REDACTED]  
[REDACTED]  
[REDACTED]  
**Email:** [REDACTED]

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**From:** Herrington, James  
**Sent:** Tuesday, February 13, 2018 2:24 PM  
**To:** Ethics  
**Cc:** Cosio-Garcia, Norma; Davis, Ronald B.; Garcia, Sandra  
**Subject:** Objection to Inclusion of My Storekeeper Position for Financial and Pecuniary Conflict of Interest Disclosure Requirements (i.e. Completion of Form 700)

I am working in the capacity of Storekeeper "A" for the City of Los Angeles, Department of Water and Power. The duties ascribed to my position involve the continuous updating and creation of material code designations relating to products and commodities inventoried at specified Departmental stores and designated warehouse locations. I have no role in the selection, exclusion or inclusion of items comprising Departmental stock items; further, I have no authority to create contracts or influence bid proposals and public offerings. My participation in defining and enabling the retention and use of products purchased by the Department is exclusive of determining suitability, preference or desirability of acquisition and relates only to ex post facto (subsequent to,

and independent of, procurement decision making) provision for description, attributions and use. There is no facet of my employment which leverages influence or control in granting or withholding contracts, purchase orders, requisitions or bid opportunities. I hold no outside business interests which could, in any way, precipitate ethical conflicts of interest or garner unseemly or inappropriate influence in Department of Water and Power transactional business concerns. Based on the foregoing, I am requesting my position and person be exempted from reporting requirements. Thank you, in advance, for your consideration and commensurate acquiescent response to this request.

**From:** [Mohammad, Svetlana](#)  
**To:** [Ethics](#)  
**Subject:** RE: LADWP's Public Notice of Proposed Conflict of Interest (COI) Code Update to Impacted LADWP Employees  
**Date:** Wednesday, February 14, 2018 12:59:27 PM

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Not yet. Need to go to the next meeting.

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**From:** Ethics  
**Sent:** Tuesday, February 13, 2018 1:34 PM  
**Subject:** LADWP's Public Notice of Proposed Conflict of Interest (COI) Code Update to Impacted LADWP Employees

Pursuant to the Political Reform Act, the Los Angeles Department of Water and Power (LADWP) announces that it intends to update LADWP's Conflict of Interest (COI) Code. This electronic announcement serves as LADWP's required public notice to those that may be impacted by the COI Code update - all current or proposed designated employees and their employee-representing entities. This announcement begins a thirty (30) day comment period during which employees, their representing entities and the public may provide comments to LADWP as set forth below.

The following documents are attached to this electronic announcement and posted to the MyDWP home page – go to the “Quick Links” and click on “Conflict of Interest (COI) Code Update”:

- Conflict of Interest (COI) Code FAQ
- Notice of Intention
- Current COI Code
- Proposed Schedule A
- Proposed Schedule B
- Deleted Positions Form

Comments and concerns may be submitted in writing only to LADWP via email at [REDACTED] or through U.S. mail to the Los Angeles Department of Water and Power, Chief Operating Officer's Office, Attention: LADWP Ethics Liaison, [REDACTED] Written concerns must be received by end of business on Thursday, March 15, 2018. LADWP will evaluate all timely-received written concerns before the COI Code is approved.

The LADWP appreciates your cooperation as we continue to move forward to update the COI Code.

**From:** [Rubin, Mark](#)  
**To:** [Ethics](#)  
**Subject:** Concerns about me being added to the list of positions required to disclose personal economic interest  
**Date:** Wednesday, February 14, 2018 7:34:47 AM

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I believe that I should not be required to disclose my personal economic interest because I do not meet the definition of making governmental decisions. I am a Management Analyst. However, I do not vote or approve a budget or make purchasing decisions or enter into a contract or negotiate terms of a contract or conduct investigations or make a recommendation regarding personnel decision or write bid specifications or make a recommendation without significant substantive review.

I do not participate in the hiring of any employees in my office. Also, I do not work on any contracts in my office.

Sincerely  
Mark Rubin

[REDACTED]

**From:** [Torres, Ida](#)  
**To:** [Ethics](#)  
**Subject:** RE: LADWP's Public Notice of Proposed Conflict of Interest (COI) Code Update to Impacted LADWP Employees  
**Date:** Wednesday, February 14, 2018 7:20:52 AM  
**Attachments:** [LADWP FAQ.pdf](#)

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## [LADWP FAQ refers to LAWDP.](#)

## [What does LAWDP stand for?](#)

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**From:** Ethics  
**Sent:** Tuesday, February 13, 2018 1:34 PM  
**Subject:** LADWP's Public Notice of Proposed Conflict of Interest (COI) Code Update to Impacted LADWP Employees

Pursuant to the Political Reform Act, the Los Angeles Department of Water and Power (LADWP) announces that it intends to update LADWP's Conflict of Interest (COI) Code. This electronic announcement serves as LADWP's required public notice to those that may be impacted by the COI Code update - all current or proposed designated employees and their employee-representing entities. This announcement begins a thirty (30) day comment period during which employees, their representing entities and the public may provide comments to LADWP as set forth below.

The following documents are attached to this electronic announcement and posted to the MyDWP home page – go to the “Quick Links” and click on “Conflict of Interest (COI) Code Update”:

- Conflict of Interest (COI) Code FAQ
- Notice of Intention
- Current COI Code
- Proposed Schedule A
- Proposed Schedule B
- Deleted Positions Form

Comments and concerns may be submitted in writing only to LADWP via email at [REDACTED] or through U.S. mail to the Los Angeles Department of Water and Power, Chief Operating Officer's Office, Attention: LADWP Ethics Liaison, [REDACTED] Written concerns must be received by end of business on Thursday, March 15, 2018. LADWP will evaluate all timely-received written concerns before the COI Code is approved.

The LADWP appreciates your cooperation as we continue to move forward to update the COI Code.



**From:** [Elman, Cecilia](#)  
**To:** [Ethics](#)  
**Subject:** You may have sent your email to the wrong person  
**Date:** Friday, February 23, 2018 7:55:56 AM

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**From:** Khurana-Carwile, Rita  
**Sent:** Thursday, February 22, 2018 10:01 AM  
**To:** Elman, Cecilia; Klee, Analee  
**Subject:** RE: Auto Reply to Incoming Emails received through [REDACTED]

Hi Cecilia, Its possible that they have you confused with Cecilia Huynh. Since you've already emailed them, hopefully you'll get a call or email soon. I'm not sure who is working in that office. thanks

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**From:** Elman, Cecilia  
**Sent:** Thursday, February 22, 2018 9:58 AM  
**To:** Klee, Analee  
**Cc:** Khurana-Carwile, Rita  
**Subject:** FW: Auto Reply to Incoming Emails received through [REDACTED]

I wonder if they are confusing me with Cecilia Huynh. I would prefer not to wait until mid-March. Do you have any contact info for this group? It sounds like you deal with them.

---

**From:** Ethics  
**Sent:** Thursday, February 22, 2018 7:46 AM  
**To:** Elman, Cecilia  
**Cc:** Klee, Analee; Khurana-Carwile, Rita  
**Subject:** Auto Reply to Incoming Emails received through [REDACTED]

The Los Angeles Department of Water and Power (LADWP) thanks you for your message.

If your email message concerns the LADWP's proposed Conflict of Interest (COI) Code, please be advised that:

- Requests for copies of the proposed code and all of the information upon which it is based will be provided to you via reply email. The reply email will include six PDF items. If you are unable to access the PDF items, the documents are also available from the MyDWP main homepage – go to the Quick Links section and click on the "Conflict of Interest (COI) Code Update" item.
- All written inquiries, comments and concerns that are received during the written comment period (from Tuesday, February 13, 2018 through end of business on Thursday, March 15, 2018) will be evaluated by LADWP before the COI Code is approved.

If your message concerns other ethics-related issues, the LADWP Ethics Liaison will read your message as soon as possible and respond appropriately.

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**From:** Elman, Cecilia  
**Sent:** Wednesday, February 21, 2018 1:40 PM  
**To:** Ethics  
**Cc:** Klee, Analee; Khurana-Carwile, Rita  
**Subject:** FW: Question on Ethics Committee

I spoke to my manager who suggested I speak to our Admin Director. She referred me back to you. See below. Thanks.

---

**From:** Klee, Analee  
**Sent:** Wednesday, February 21, 2018 1:29 PM  
**To:** Elman, Cecilia  
**Cc:** Khurana-Carwile, Rita  
**Subject:** RE: Question on Ethics Committee

Hi Cecilia,

Unfortunately, I don't have the answer to your question. You were not on my original list of COIC filers (mandatory or voluntary). I will have to refer you back to them.

Thanks,  
*Analee*



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**From:** Elman, Cecilia  
**Sent:** Wednesday, February 21, 2018 12:56 PM  
**To:** Klee, Analee  
**Cc:** Khurana-Carwile, Rita  
**Subject:** FW: Question on Ethics Committee  
**Importance:** High

Rita suggested I contact you. The ethics committee acknowledged my emails but have not yet replied.

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**From:** Elman, Cecilia  
**Sent:** Wednesday, February 21, 2018 8:31 AM  
**To:** Ethics  
**Subject:** RE: Question  
**Importance:** High

I was hoping to hear from you before I ask my managers. According to our ITSR procedures, I have two managers above me who are responsible for making purchasing decisions. I provide the research and justification, of course. Thanks.

---

**From:** Elman, Cecilia  
**Sent:** Thursday, February 15, 2018 11:21 AM  
**To:** Ethics  
**Subject:** Question

I noticed I am one of two systems analysts on the list. May I ask why I was chosen? Also, who is the other systems analyst? Thank you.

**From:** [Cosio-Garcia, Norma](#)  
**To:** [Ethics](#)  
**Subject:** RE: LADWP's Public Notice of Proposed Conflict of Interest (COI) Code Update to Impacted LADWP Employees  
**Date:** Thursday, February 22, 2018 3:37:32 PM  
**Attachments:** [General\\_Srvcs\\_COI.pdf](#)

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I recommend you review Schedule A and especially **Schedule B**.

I've attached the General Services COI schedules for your review.  
LADWP is only asking our top Managers for the following disclosure:

<b><u>Category 1</u></b>	<b>LADWP Category 1 is the <u>least</u> effective of all the Categories</b>
Any investment, business position, source of income, or interest in real property.	
<b><u>Category 2</u></b>	

General Services uses Category 1, the most inclusive category, to protect themselves from abuse from the highest levels.

<b><u>CATEGORY 1</u></b>	<b>General Services uses Category 1 as the most INCLUSIVE category.</b>
A. Any investment, interest in from real property, or income as defined in categories 2 through 17, inclusive.	
B. Any income from any individual who, during the past twelve months, was employed by or who applied for employment by the Department of General Services.	
<b><u>CATEGORY 2</u></b>	

For example, you have Supply Service Manager, the ones that sign off on recommendations of awards and ensure we are doing things ethically, at a Category 1.

You also do not including the Warehouse & Toolroom worker in Schedule A.

I would hope your instructions say that if the possibility exists of an Article 33 upgrade, the COI form will have to be on file.

It would be easier if the COI requirement were part of On-Boarding new staff in certain Department Organizations. (all of SCS for example)

OR

Ensure that anyone that has any part of encumbering Department funds or making recommendations of awards has a COI on file.

(Credit Card holders, anyone with eRSP access, access in Maximo, have access to order from vendors, etc.)

Thank you for your time as this is my opinion to keep the DWP out of Channel 2 headlines.

Thank you,  
**Norma Cosio-Garcia | LADWP**  
Stores Supervisor | Contract Administration  
Supply Chain Svcs | Materials & Logistics

[REDACTED]

**From:** Ethics

**Sent:** Tuesday, February 13, 2018 1:34 PM

**Subject:** LADWP's Public Notice of Proposed Conflict of Interest (COI) Code Update to Impacted LADWP Employees

Pursuant to the Political Reform Act, the Los Angeles Department of Water and Power (LADWP) announces that it intends to update LADWP's Conflict of Interest (COI) Code. This electronic announcement serves as LADWP's required public notice to those that may be impacted by the COI Code update - all current or proposed designated employees and their employee-representing entities. This announcement begins a thirty (30) day comment period during which employees, their representing entities and the public may provide comments to LADWP as set forth below.

The following documents are attached to this electronic announcement and posted to the MyDWP home page – go to the “Quick Links” and click on “Conflict of Interest (COI) Code Update”:

- Conflict of Interest (COI) Code FAQ
- Notice of Intention
- Current COI Code
- Proposed Schedule A
- Proposed Schedule B
- Deleted Positions Form

Comments and concerns may be submitted in writing only to LADWP via email at [REDACTED] or through U.S. mail to the Los Angeles Department of Water and Power, Chief Operating Officer's Office, Attention: LADWP Ethics Liaison, [REDACTED]. Written concerns must be received by end of business on Thursday, March 15, 2018. LADWP will evaluate all timely-received written concerns before the COI Code is approved.

The LADWP appreciates your cooperation as we continue to move forward to update the COI Code.

**From:** [Solomon, William](#)  
**To:** [Ethics](#)  
**Subject:** Here are the concerns and questions from SETD's  
**Date:** Sunday, March 4, 2018 8:18:52 AM  
**Attachments:** [SETD Memo to COOfficer RE- COI List A 030218 final.pdf](#)

---

Good day.

Here are our concerns and thoughts on your idea of adding the class of Senior Electric Trouble Dispatcher to the 'A' list of COI issue.  
(also attached as a pdf)



## LADWP Electric Trouble Dispatch Office

**To:** Los Angeles DWP, Chief Operating Officer  
**CC:** Levon Mitchell, Robert Lewis, Scott Barnes, Terry Jackson, IBEW Local 18  
**From:** The SETD Staff of Electric Trouble.  
**Date:** 3/4/2018  
**Re:** SETD's require more clarity on why we have been added to the A list.

---

The Senior Electric Trouble Dispatchers (SETD for the rest of this document) do not understand what is truly meant by adding our group to the list. We require more specific clarification on the reasons the class of Senior Electric Trouble Dispatchers has been chosen to be added to the 'A' list as part of the Conflict of Interest (COI). The reasons why as explained in the 'FAQ' document are far to reaching, unclear, and may represent a fundamental alteration of our employment agreement. Thus, we are requesting more information and a full 'meet and confer' on this issue before acceptance can occur and implementation takes place.

Please understand our position; we are the authorized representative of the Load Dispatcher for the 7.2kv and below distribution power system that does not require any switching in a DS station. We make decisions on an operational basis every day that are for the protection of field personnel, the public, and the integrity of the distribution power system as specified by our Operating Orders, work practices, policies, and procedures. We only make decisions based on the need of the immediate situation at hand. Certain decisions must be made from time to time for the immediate protection of life and system integrity. Those decisions are never made in a vacuum, but with the cooperation and approval of personnel affected by those decisions, and as practical, with approval from our management.

Based on the 'Why my position is being added?' section of the LADWP FAQ,

Let's breakdown the reasons given one by one, and why they are to large and unspecific, thus do not apply to us:

**Voting:** As SETD's, we do NO 'voting' in the workplace. Any voting we do as employees is based on our Union Policy and rights to vote on accepting or rejecting on a union negotiated contract of pay and benefits package offered to us by the DWP. We do this privately, as required by Union and DWP Rules. We do not individually discuss how we vote, for each of us personally votes based on each individual's personal & political beliefs, whether inside our outside of my employment with the DWP and selection I chose with my vote, is *no one's business but our own unless I chose to share my choice*.

**Approving a budget:** We are not involved in any way with approving any budget of any kind, period.

**Making a purchasing decision:** We do not approve nor make any purchasing decisions as dispatchers. We may request that a specific item(s) be purchased on behalf of the office, however, even if all are asked for an opinion about whether as a group we want said item, final approval and subsequent purchase rests solely with our upper management.

**Entering into or negotiating a contract:** We do not negotiate or enter into any binding legal contracts with any organizations inside of or outside of the DWP. In our daily operations of the Distribution Power System outside of the DS Station, we do make verbal agreements with internal and, on occasion, with external customers in order to provide the needed work authorities and proper resources to deal with a trouble or routine work situation on the Distribution Power System. These decisions are made under the implied authority given to us by the Operating Orders, policies, procedures, and Load Dispatcher consent for the sole purpose of maintaining and protecting the Distribution Power system. As with the Load Dispatchers, we must be indemnified against recourse from the decisions we make for operational necessity on a daily basis. Unless said decision was in direct violation of the applicable Operating Orders, policies, and procedures not adhered to. These operational decisions are NOT made with regard to the fiscal impact of the decision, but from an system integrity and safety point of view.

**Investigations:** We DO NOT conduct in-depth incident investigations. If we are involved in a personnel or operationally related incident, our investigative process begins and ends with the initial incident report. This may include, if related to our ETD personnel, obtaining statements from the involved parties, including oneself, and provide this information to our management. Any further investigation of the incident is carried out by ETD management personnel.

**Making a recommendation regarding personnel decision:** This is something we are involved with, but on a limited and controlled basis, where we observe the behavior and performance of perspective ETD Trainees during their training process. We then fill out detailed evaluation forms based on what we observe and present the resulting documentation to upper management. We also, based upon Operational Need basis, following a specific process, offer OT to our staff of SETD's or ETD's based on the need to cover a position for a given date and time period base upon the operational necessities of the ETD office. We make no permanent 'personnel decisions' related to the hiring or termination of a said individual employee or trainee.

**Writing Bid Specifications.** Once again; we do not get involved directly with this part of a 'Bid' for an item. We may be asked for our opinion on what the items specifications might be, assisting upper management personnel with having all the info they need to write a specification. But we do not create and specific bid, then submit it through the purchasing process. This is only done via our upper management.

**Making a recommendation without significant substantive review:** We as SETD's are tasked with the responsibility to make operationally based decisions about items, situations, and personnel under our control based on the Operating Orders, Policies, and Procedures we follow for the main purpose of protecting personnel, safely restoring power to customers, and system integrity. We never make these decisions in a pure vacuum. We gather all of the information we can and discuss the situation with other key operations personnel, upper management and/or second level, from groups

or sections that the decision could have an effect on. Thus, the final decision and subsequent action taken are the result of a consensus of the persons we worked with and done in adherence to the operational rules and procedures of the LA DWP. On very rare occasions, if the situation is urgent enough, due to the risk of injury to DWP personnel or the public from a safety perspective, or to the DWP Distribution system we may direct the action to take place immediately, without discussion, as we have the authority to do based on the Operating Orders, DDR, and procedures. These decisions are NEVER made from a fiscal effect or cost benefit stand point.

**Most importantly:** The reasons I have elaborated on as outlined in the FAQ document as to why we were added to the list, especially the reason above, are so vague and non-specific, that virtually any decision could be misconstrued, or misinterpreted by another party, section, manager, or legal attorney totally uninformed about what we do, and ultimately viewed as being a poor one from a fiscal point of view.

**We must be able to continue to do our jobs!** We do these jobs to the best of our abilities each and every day. Our decisions must be viewed from the perspective of how they are made based on the operational needs of the Power Distribution System at that moment in time, as well as the Policies and Procedures we are mandated to follow as laid out by DWP documentation. We should not be on this list.

Sincerely,

***Senior Electric Trouble Dispatchers.***

**From:** [Le, Linda](#)  
**To:** [Ethics](#)  
**Cc:** [Mendez, Veronica C.](#)  
**Subject:** RE: Notice of Intention to Amend LADWP's Conflict of Interest (COI) Code  
**Date:** Friday, January 4, 2019 2:02:35 PM

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I have concerns regarding the categories assigned to Assistant Retirement Plan Manager, Investment Officers, and Principle Utility Accountant (should be different for ones assigned to Retirement Office than the ones assigned to FSO).

**Linda P. Le** | Retirement Plan Manager

Los Angeles Department of Water and Power

Water and Power Employees' Retirement Plan

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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**From:** Ethics

**Sent:** Friday, January 4, 2019 12:52 PM

**To:** [REDACTED]

[REDACTED] Bogin, LaTanya; Felix, Adolfo (water); [REDACTED] Ignacio, Mario; Poole, Barry

**Cc:** Le, Linda; Mendez, Veronica C.; Moschos, Barbara

**Subject:** Notice of Intention to Amend LADWP's Conflict of Interest (COI) Code

Pursuant to the Political Reform Act, the Los Angeles Department of Water and Power (LADWP) announces that it intends to update LADWP's Conflict of Interest (COI) Code. This electronic announcement:

- Serves as LADWP's required public notice to those that may be impacted by the amended COI Code update - all current or proposed designated employees and their employee-representing entities;



- Announces LADWP’s second written public comment period. The initial period was held from February 13 through March 15, 2018 and after the close of that period, amendments were made to the code; and
- Begins a thirty (30) day comment period during which employees, their representing entities and the public may provide comments to LADWP as set forth below.

The following documents are attached to this electronic announcement and are posted to the MyDWP home page – go to the “Quick Links” and click on “Conflict of Interest (COI) Code Update”:

- Conflict of Interest (COI) Code Revision FAQ
- Notice of Intention
- Current COI Code
- Proposed Schedule A
- Proposed Schedule B
- Deleted Positions Sheet

Comments and concerns may be submitted in writing only to LADWP via email at [REDACTED] or through U.S. mail to the Los Angeles Department of Water and Power, Chief Operating Officer’s Office, Attention: LADWP Ethics Liaison, [REDACTED]. Written concerns must be received by end of business on Monday, February 4, 2019. LADWP will evaluate all timely-received written concerns before the COI Code is approved.

The LADWP appreciates your cooperation as we continue to move forward to update the COI Code.

<< File: LADWP FAQ 010319.pdf >> << File: Notice of Intention 010319.pdf >> << File: Schedule B.pdf >> << File: Deleted Positions Sheet.pdf >> << File: LADWP COI Code Schedule A 010319.pdf >> << File: Current DWP COI with Form 804.pdf >>

**From:** [Lau, Chester](#)  
**To:** [Ethics](#)  
**Subject:** RE: Notice of Intention to Amend LADWP's Conflict of Interest (COI) Code  
**Date:** Monday, January 7, 2019 9:19:55 AM

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Per the FAQ, a login ID and password for eDisclosure will be emailed to me. When will I receive the email?

**Where may I find instructions for completing the Form 700?**

The Form 700 can be filed using [eDisclosure](#), the Ethics Commission's electronic filing portal. A login ID and password are required to access the system and will be emailed to you if you are added to the electronic filing database.

Regards,

Chester Lau

LADWP

Field Inspection Team

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**From:** Ethics  
**Sent:** Friday, January 4, 2019 2:39 PM  
**To:** COIC2019  
**Subject:** Notice of Intention to Amend LADWP's Conflict of Interest (COI) Code

Pursuant to the Political Reform Act, the Los Angeles Department of Water and Power (LADWP) announces that it intends to update LADWP's Conflict of Interest (COI) Code. This electronic announcement:

- Serves as LADWP's required public notice to those that may be impacted by the amended COI Code update - all current or proposed designated employees and their employee-representing entities;
- Announces LADWP's second written public comment period. The initial period was held from February 13 through March 15, 2018 and after the close of that period, amendments were made to the code; and
- Begins a thirty (30) day comment period during which employees, their representing entities and the public may provide comments to LADWP as set forth below.

The following documents are attached to this electronic announcement and are posted to the MyDWP home page – go to the “Quick Links” and click on “Conflict of Interest (COI) Code Update”:

- Conflict of Interest (COI) Code Revision FAQ
- Notice of Intention
- Current COI Code
- Proposed Schedule A
- Proposed Schedule B
- Deleted Positions Sheet

Comments and concerns may be submitted in writing only to LADWP via email at [REDACTED] or through U.S. mail to the Los Angeles Department of Water and Power, Chief Operating Officer's Office, Attention: LADWP Ethics Liaison, [REDACTED]. Written concerns must be received by end of business on Monday, February 4, 2019. LADWP will evaluate all timely-received written concerns before the COI Code is approved.

The LADWP appreciates your cooperation as we continue to move forward to update the COI Code.

<< File: LADWP FAQ 010319.pdf >> << File: Notice of Intention 010319.pdf >> << File: Schedule B.pdf >> << File: Deleted Positions Sheet.pdf >> << File: LADWP COI Code Schedule A 010319.pdf >> << File: Current DWP COI with Form 804.pdf >>

**From:** [Catsoulas, Mike](#)  
**To:** [Ethics](#)  
**Cc:** [Woodson, Matt](#); [Suterko, Peter](#); [Gus Corona](#); [vcormier@ibewlocal18.org](mailto:vcormier@ibewlocal18.org); [Werthe, Christopher](#); [Dizon, Marcelino](#); [Allen, Robert](#); [Sandoval, Manuel](#); [Achema, Timothy](#); [Valimento, William](#); [Natera, Moises](#)  
**Subject:** RE: Notice of Intention to Amend the Conflict of Interest Code of the LADWP  
**Date:** Tuesday, January 8, 2019 9:02:23 AM

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**RE:** Notice of Intention to Amend the Conflict of Interest Code of the LADWP

**Attention:** LADWP Ethics Liaison and Management

**Summary:** Email received titled "Notice of Intention to Amend LADWP's Conflict of Interest (COI) Code" should exclude Senior Safety Engineer Pressure Vessels and Safety Engineer Pressure Vessels from COI code or include all LADWP employees that are required to report unsafe conditions to supervisors and adhere to articles one through fourteen of the City of Los Angeles CODE OF ETHICS STATEMENT OF APPROVED PRINCIPLES FOR PUBLIC SERVICE IN THE GOVERNMENT OF THE CITY OF LOS ANGELES.

**To:** Whom it may concern,

Please refer to the current Los Angeles Department of Water and Power Quality Control Systems Manual (QCSM), as approved by State of California jurisdictional authority and under which conflicts of interest for the positions Senior Safety Engineer Pressure Vessels and Safety Engineer Pressure Vessels (SEPV's) are by definition and duty the same as any other employee. That is, generally speaking, required to notify the Supervisors of unsafe conditions and non-conformances. They do not participate in making, make, or have the potential to make governmental decisions. They, in accordance with the QCSM, perform inspections, raise safety issues, note and report findings, and provide the results to persons in control the chain of LADWP Management as noted in the QCSM and approved by the Chief Safety Engineer Pressure Vessels.

The Chief Safety Engineer Pressure Vessels; as noted throughout the QCSM; more significantly in the STATEMENT OF POLICY AND AUTHORITY, page iii, and as signed by the LADWP General Manager; requires that any difference of opinion pertaining to the QCSM that cannot be resolved by the Chief Safety Engineer Pressure Vessels shall be referred to the LADWP General Manager. Herein the QCSM clearly identifies who is responsible for potential governmental decisions.

The following are required for LADWP positions performing duties to the QCSM requirements, including the issuance and retaining on file of reports of findings, which are to be conducted by the Chief Safety Engineer Pressure Vessels or his / her designee:

- Annual Audits of LADWP Senior SEPV work
- Annual Audits of LADWP SEPV work
- Annual Audits of Nondestructive Examination Vendors / Contractors quality control systems
- LADWP Review and Approve of all written reports, correction notices, and non-conformances, and

- LADWP and Jurisdictional Arrangements to ensure completion of Annual and Triennial audits of work at Generating Stations (Steam Plants) by the National Board, other Qualified SEPV's, and the State of California as applicable

All raised QCSM non-conformances or findings by any of the QCSM users, not limited to but including the positions of Senior SEPV's and SEPV's, are disposed through the Chief Safety Engineer Pressure Vessels. The Chief Safety Engineer Pressure Vessels and the Management positions above it are the only potential positions in the QCSM that have a potential to make COI governmental decisions; further, they are required, by and through the QCSM and the auditing processes to discover and disclose in writing any failure of a subordinate to meet QCSM requirements and provide them notification as a non-conformance which may include a formal discussion to correct all the way up to and including revocation of specific qualifications be they engineering, welding, inspection, confined space safe entry, and all other QCSM related duties.

If you do not know what the QCSM is or are unaware of the specific requirements please contact the GM, Chief Safety Engineer Pressure Vessels, any of the LADWP employees copied, or myself for assignment of a controlled copy.

Respectfully,

LADWP SEPV  
Mike Catsoulas  


**From:** [Lew, Kelvin](#)  
**To:** [Ethics](#)  
**Subject:** Comments on Proposed Amendments to COI Code  
**Date:** Tuesday, January 15, 2019 10:13:51 AM

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Following are comments/concerns resulting from review of the proposed amendments to Government Code Section 87300 and 87306.

There is an apparent inequity and unclear rationale for the following Position Titles and Disclosure Categories:

The Director of Efficiency Solutions (aka. Executive Assistant to the General Manager) is specifically downgraded from Disclosure Category 1 to Category 8 with no explanation.

The Director of Environmental Affairs (which is a Utility Services Manager 6) is identified as a Disclosure Category 8.

The Position Title of Utility Service Manager is identified as Disclosure Category 8, so there is no rationale identified as why the Director of Environmental Affairs needs to be identified separately if there is no change in category.

Furthermore, there is no accounting for the following Position Titles under the Director Environmental Affairs, which are in a higher disclosure category than the Director:

Utility Services Manager 4 (Assistant Director of Environmental Affairs) – Category 8, and

Mechanical Engineer A (Assistant Director of Environmental Affairs) – Category 5, 11  
Environmental Affairs Officer, which is effectively 4 paygrades below the Director of Environmental Affairs, a USM6) – Category 1 (“Broadest Category”)

Industrial Hygienist (Reports to Environmental Affairs Officer) – Category 3

Environmental Supervisor (Reports to Environmental Affairs Officer) – Category 5

Environmental Specialist (Entry Level position reports to Environmental Supervisor) – Category 3

Engineering Geologist Associate (Entry Level position reports to Environmental Supervisor) – Category 5

It is completely illogical that subordinate classifications several levels below (including entry level) the Director would have a significantly higher disclosure categories than the directors themselves.

Additionally, a disclosure category of 8 for directors that regularly authorize work under multiple multi-million dollar contracts, where the subordinate classifications have higher disclosure categories and yet do not have signature authority to do so, makes the inequity in the disclosure categories even more questionable.

The documents that have been provided in the electronic announcement are insufficient to provide a defensible rationale for the inequities identified above.

representing entities and the public may provide comments to LADWP as set forth below.

The following documents are attached to this electronic announcement and are posted to the MyDWP home page – go to the “Quick Links” and click on “Conflict of Interest (COI) Code Update”:

- Conflict of Interest (COI) Code Revision FAQ
- Notice of Intention
- Current COI Code
- Proposed Schedule A
- Proposed Schedule B
- Deleted Positions Sheet

Comments and concerns may be submitted in writing only to LADWP via email at [REDACTED] or through U.S. mail to the Los Angeles Department of Water and Power, Chief Operating Officer’s Office, Attention: LADWP Ethics Liaison, [REDACTED]. Written concerns must be received by end of business on Monday, February 4, 2019. LADWP will evaluate all timely-received written concerns before the COI Code is approved.

The LADWP appreciates your cooperation as we continue to move forward to update the COI Code.

<< File: LADWP FAQ 010319.pdf >> << File: Notice of Intention 010319.pdf >> << File: Schedule B.pdf >> << File: Deleted Positions Sheet.pdf >> << File: LADWP COI Code Schedule A 010319.pdf >> << File: Current DWP COI with Form 804.pdf >>

**From:** [Gonzalez, Josephine](#)  
**To:** [Ethics](#)  
**Subject:** RE: Notice of Intention to Amend LADWP's Conflict of Interest (COI) Code  
**Date:** Friday, February 1, 2019 2:33:48 PM

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To whom it may concern:

What criteria was used to determine placement of the "Designated Positions" into specified "Disclosure Categories"? I would like to know why I, as an Environmental Affairs Officer, am required to disclose at the broadest category along with the Commissioners, GM, AGM, FSO etc., while my immediate supervisor, Director of Environmental Affairs, who is a Utility Service Manager level 6, is only required to be in disclosure category 8.

I do not have any more authority or opportunity for conflicts than he has. I can see that the numeric system of disclosure categories is not necessarily linear and that it is focused on activities and responsibilities such as contracts, personnel, regulatory issues and is a combination of each specific activity and responsibility. However, it does not make sense that the person who oversees an employee's duties and responsibilities would have a lesser disclosure requirement than those they supervise.

I am requesting that you re-evaluate and explain how these position placements were determined.

Thank you

Josephine Gonzalez

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**From:** Ethics  
**Sent:** Friday, January 4, 2019 2:39 PM  
**To:** COIC2019  
**Subject:** Notice of Intention to Amend LADWP's Conflict of Interest (COI) Code

Pursuant to the Political Reform Act, the Los Angeles Department of Water and Power (LADWP) announces that it intends to update LADWP's Conflict of Interest (COI) Code. This electronic announcement:

- Serves as LADWP's required public notice to those that may be impacted by the amended COI Code update - all current or proposed designated employees and their employee-representing entities;
- Announces LADWP's second written public comment period. The initial period was held from February 13 through March 15, 2018 and after the close of that period, amendments were made to the code; and
- Begins a thirty (30) day comment period during which employees, their



**From:** [Davis, Craig A.](#)  
**To:** [Ethics](#)  
**Subject:** LADWP Retirement and consulting policies  
**Date:** Saturday, February 2, 2019 5:08:56 PM

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I am soon to retire from the LADWP Water System. I plan to do some level of consulting following my retirement. Can you provide me with information on the Department's policy and ethics rules related to retiree's doing consulting directly or indirectly involving the LADWP?

Thank you for your assistance.

Craig Davis

**From:** [Hybarger, Asya hickman](#)  
**To:** [Ethics](#)  
**Subject:** FW: Notice of Intention to Amend LADWP's Conflict of Interest Code  
**Date:** Friday, August 13, 2021 1:06:16 PM  
**Attachments:** [Notice of Intention to Amend the COI Code.pdf](#)  
[LADWP's FAQ for Conflict of Interest Code Revision.pdf](#)  
[LADWP's Current COI Code and Form 804.pdf](#)  
[LADWP's Proposed Designated Categories \(Schedule B\).pdf](#)  
[LADWP's Proposed Designated Positions \(Schedule A\).pdf](#)

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Hello:

I just want to verify the authenticity of this email.

Thank you!

Asya H. Hybarger  
Real Estate Services  
Los Angeles Department of Water and Power

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**From:** Ethics  
**Sent:** Friday, August 13, 2021 11:10 AM  
**To:** COIC2021 <zzDL\_COIC2021@ladwp.com>  
**Subject:** Notice of Intention to Amend LADWP's Conflict of Interest Code

To All Current and Potential LADWP Officials/Required Filers and representing Employee Organization/Associations,

Per the Political Reform Act of 1974, state and local government agencies are required to adopt and promulgate conflict of interest codes (code), and to periodically update and amend their Conflict of Interest Codes (code) to ensure they reflect the agency's current organizational structure. Codes identify public officials that make or participate in making the agency's governmental decisions and require such officials to disclose specific categories of personal financial interests to avoid or otherwise identify potential conflicts of interest. For the purpose of these codes, City public officials may consist of employees, commissioners, board members, and consultants.

This email informs you that:

- LADWP is amending its code;
- The proposed code will apply ONLY to those employees whose position titles are listed in the code;
- As an individual whose position title is listed in LADWP's proposed code, you may be a

public official that may be required to complete the aforementioned personal financial disclosures; and

- A third public comment period has been established starting on Monday, August 16, 2021 and ending on Wednesday, September 15, 2021 (a 30-day period). Comments will be accepted in writing only and those received within this comment period will be evaluated.

The following documents are attached to this email for your review:

- Notice of Intention to Amend the Conflict of Interest Code of LADWP;
- LADWP's Current COI Code (Schedule A and Schedule B);
- LADWP's Proposed Designated Positions (Schedule A) - lists the positions LADWP proposes to identify as City officials (as defined by law and set forth in subdivision [a] of Section 87302 of the Government Code);
- LADWP's Proposed Disclosure Categories (Schedule B) - defines the financial interests for each disclosure category that must be disclosed (reported) on a personal financial disclosure form (FPPC Form 700 - Statement of Economic Interests); and
- LADWP's Frequently Asked Questions (FAQ) for LADWP's Conflict of Interest Code Revision.

For questions or additional information, please contact the LADWP Ethics Liaison at

[REDACTED]

**From:** [Klein, George](#)  
**To:** [Ethics](#)  
**Subject:** Re: Notice of Intention to Amend LADWP's Conflict of Interest Code  
**Date:** Friday, August 13, 2021 11:37:22 AM

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I am not on the list of positions listed in the code and subject to this conflict of interest reporting.

Please do not send me this stuff as it would be unethical for you to do so.

-George Klein  
Programmer Analyst III

---

**From:** Ethics  
**Sent:** Friday, August 13, 2021 11:10 AM  
**To:** COIC2021  
**Subject:** Notice of Intention to Amend LADWP's Conflict of Interest Code

To All Current and Potential LADWP Officials/Required Filers and representing Employee Organization/Associations,

Per the Political Reform Act of 1974, state and local government agencies are required to adopt and promulgate conflict of interest codes (code), and to periodically update and amend their Conflict of Interest Codes (code) to ensure they reflect the agency's current organizational structure. Codes identify public officials that make or participate in making the agency's governmental decisions and require such officials to disclose specific categories of personal financial interests to avoid or otherwise identify potential conflicts of interest. For the purpose of these codes, City public officials may consist of employees, commissioners, board members, and consultants.

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- LADWP is amending its code;
- The proposed code will apply ONLY to those employees whose position titles are listed in the code;
- As an individual whose position title is listed in LADWP's proposed code, you may be a public official that may be required to complete the aforementioned personal financial disclosures; and
- A third public comment period has been established starting on Monday, August 16, 2021 and ending on Wednesday, September 15, 2021 (a 30-day period). Comments will be accepted in writing only and those received within this comment period will be evaluated.

The following documents are attached to this email for your review:

- Notice of Intention to Amend the Conflict of Interest Code of LADWP;

- LADWP's Current COI Code (Schedule A and Schedule B);
- LADWP's Proposed Designated Positions (Schedule A) - lists the positions LADWP proposes to identify as City officials (as defined by law and set forth in subdivision [a] of Section 87302 of the Government Code);
- LADWP's Proposed Disclosure Categories (Schedule B) - defines the financial interests for each disclosure category that must be disclosed (reported) on a personal financial disclosure form (FPPC Form 700 - Statement of Economic Interests); and
- LADWP's Frequently Asked Questions (FAQ) for LADWP's Conflict of Interest Code Revision.

For questions or additional information, please contact the LADWP Ethics Liaison at

[\[REDACTED\]](#)

**From:** [Gilbert, Gary](#)  
**To:** [Ethics](#)  
**Subject:** Question about my positions requirement to report potential for COI  
**Date:** Monday, August 16, 2021 4:26:56 PM

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Hello My name is Gary I have a couple of questions I am hoping you can clarify;

#1 I am currently an Equipment Repair Supervisor in Fleet under Joint. I do not see that exact title but I do see Construction Equipment Service Supervisor Category 11, should I assume this title will include my current position?

#2 I am interviewing for a position covered under Category 13. Labor Supervisor.

My outside interest is that my family has a LADWP Farm/Ranch lease. I do not collect a paycheck, nor do we buy or sell any products or any services to the Department. Category 13 Section C. talks about owning an interest in LADWP leased land but also says, "*when the filer's division provided a review, recommendation or referral*". Looking for a description of "division" is it Water, Power, Joint, or Northern Aqueduct, or one of the sub-groups of Aqueduct; like Real Estate, Commercial, Construction, Safety, Range and Wildlife, etc.? I am not sure what my division is.

My supervisor would be a Safety C&M under Northern Aqueduct, under Water, under LADWP. I am just not sure which is the "division"? I myself would not be making any recommendations or referrals that effect my interest but if I am somehow considered the same division as Real Estate, they might take one of those actions. As Lessees we do not make reviews, referrals or recommendations however Real Estate could recommend I remove a tree, clean a ditch, fix a fence, irrigate, don't irrigate etc.

Before I accept that position if I am asked, could you tell me how I might be impacted. As there are already a lot of unanswered questions and supposed changes in the works of Real Estate Ranch and Commercial leases and use permits, and how it effects employees such as myself with long term leases operated by their families as has mine for over 100 years.

If the City of Los Angeles is considered the Division then I would be effected no matter which of the two positions I held. I believe the land is owned by the City of LA but managed by LADWP Real Estate.

Please give me a call if we need to discuss and clarify some of this.

Thank you for your help, Gary

**Gary Gilbert**

Equipment Repair Supervisor

[REDACTED]  
[REDACTED]  
[REDACTED]

**From:** [Alvelais, Lucia](#)  
**To:** [Ethics](#)  
**Subject:** Protest Submittal Regarding Notice of Intention to Amend LADWP's Conflict of Interest Code  
**Date:** Tuesday, August 17, 2021 2:50:41 PM  
**Attachments:** [LADWP's FAQ for Conflict of Interest Code Revision.pdf](#)  
[image002.png](#)

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Good afternoon,

I would like it noted that I am concerned about **and opposed** to the new Conflict of Interest Code requirement that Retirees, as well as individuals no longer employed by LADWP, must continue to complete the Form 700 on an annual basis.

The language to which I refer and which is of great concern to me is extracted from the LADWP's FAQ for Conflict of Interest Code Revision (attached). If I misunderstood the language, I would appreciate a response in clarification.

In reading the FAQs, I noted the language below under the "How Does the COI Code Revision Impact Me?" header on page 2:

- If you occupy a position title listed in the revision, there is no impact to you while LADWP is navigating the COI code revision through the above-described adoption process. However, after the COI code is adopted by the City Council, you will be required to disclose certain personal economic interests by completing a Form 700 within thirty (30) days of the code's adoption and will continue to be required to complete it annually (every April 1) **and when you leave the designated COI code position title (e.g. retire, resign, transfer to another City Department or a position title that is not on the COI code).**

Are the examples cited in parentheses above erroneous? I could see why the requirement would pertain to an active Department or City employee, but why would it continue for retirees and individuals who have resigned and are no longer employed by the City of Los Angeles?

What would be the repercussions for non-compliance to this "requirement"?

Would LADWP withhold retirement checks for non-compliance? I am not sure such an action would be legal and would potentially expose the Department to litigation from our many retirees.

Thank you for the opportunity to state my opposition and concerns regarding the new COI Code revisions.

**Lucia Alvelais**  
**Manager, CI&I Energy Efficiency Program Portfolio**  
**Los Angeles Department of Water & Power**

LADWP's Efficiency Solutions – Helping LA Save Energy & Water






**From:** [Negrete, Ashley](#)  
**To:** [Ethics](#)  
**Subject:** Question about Conflict of Interest Code  
**Date:** Tuesday, August 17, 2021 12:02:00 PM

---

Good morning,

In reading the FAQs (see language below), does it mean that we are obligated to fill out this form every year, even when we retire or change to a position not on the code?

If you occupy a position title listed in the revision, there is no impact to you while LADWP is navigating the COI code revision through the above-described adoption process. However, after the COI code is adopted by the City Council, you will be required to disclose certain personal economic interests by completing a Form 700 within thirty (30) days of the code's adoption and will continue to be required to complete it annually (every April 1) **and when you leave the designated COI code position title (e.g. retire, resign, transfer to another City Department or a position title that is not on the COI code).**

Thank you,  
Ashley Negrete  
Efficiency Solutions  


**From:** [Tieman, Estela](#)  
**To:** [Ethics](#)  
**Subject:** COI revision  
**Date:** Wednesday, August 18, 2021 6:12:34 PM  
**Attachments:** [image002.png](#)  
[image004.png](#)

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Hello

I noticed field supervisor classifications were included in the designated positions, but the list did not include the equivalent customer service supervisor. This classification is the commercial service supervisor (CSS) classification. There are many CSS employees in Customer Service Division and many are often involved in customer service policy creation. It is a misconception that this classification is only involved in clerical work or just manages people who answer the phone.

Thanks,  
[Estela B Tieman](#)

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**Los Angeles Department of Water & Power**

Customer Service Division | Director of Customer Operations




[www.ladwp.com](http://www.ladwp.com) | [@ladwp](#) | [ladwp](#) | [ladwp1](#)

**From:** [Kaloumaira, April](#)  
**To:** [Ethics](#)  
**Subject:** RE: Notice of Intention to Amend LADWP's Conflict of Interest Code  
**Date:** Thursday, August 19, 2021 8:33:42 AM


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I have some concerns from staff regarding certain classifications that are included and equal positions that are not. For example, Senior Architectural Drafting Technician is included, but no other senior classifications are here (Civil, Mechanical, Electrical). Clarification would be great.

Thank you.

*April Kaloumaira*  
*Chief of Power Drafting Operations*  
*Dept. Of Water & Power*  


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**From:** Ethics  
**Sent:** Friday, August 13, 2021 11:10 AM  
**To:**   
**Subject:** Notice of Intention to Amend LADWP's Conflict of Interest Code

To All Current and Potential LADWP Officials/Required Filers and representing Employee Organization/Associations,

Per the Political Reform Act of 1974, state and local government agencies are required to adopt and promulgate conflict of interest codes (code), and to periodically update and amend their Conflict of Interest Codes (code) to ensure they reflect the agency's current organizational structure. Codes identify public officials that make or participate in making the agency's governmental decisions and require such officials to disclose specific categories of personal financial interests to avoid or otherwise identify potential conflicts of interest. For the purpose of these codes, City public officials may consist of employees, commissioners, board members, and consultants.

This email informs you that:

- LADWP is amending its code;
- The proposed code will apply ONLY to those employees whose position titles are listed in the code;
- As an individual whose position title is listed in LADWP's proposed code, you may be a public official that may be required to complete the aforementioned personal financial disclosures; and
- A third public comment period has been established starting on Monday, August 16, 2021 and ending on Wednesday, September 15, 2021 (a 30-day period). Comments will be accepted in writing only and those received within this comment period will be evaluated.

The following documents are attached to this email for your review:

- Notice of Intention to Amend the Conflict of Interest Code of LADWP;
- LADWP's Current COI Code (Schedule A and Schedule B);
- LADWP's Proposed Designated Positions (Schedule A) - lists the positions LADWP proposes to identify as City officials (as defined by law and set forth in subdivision [a] of Section 87302 of the Government Code);
- LADWP's Proposed Disclosure Categories (Schedule B) - defines the financial interests for each disclosure category that must be disclosed (reported) on a personal financial disclosure form (FPPC Form 700 - Statement of Economic Interests); and
- LADWP's Frequently Asked Questions (FAQ) for LADWP's Conflict of Interest Code Revision.

For questions or additional information, please contact the LADWP Ethics Liaison at



**From:** [Law, Anthony](#)  
**To:** [Ethics](#)  
**Subject:** RE: Notice of Intention to Amend LADWP's Conflict of Interest Code  
**Date:** Friday, August 20, 2021 1:16:15 PM

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What do I need to do with these documents?

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**From:** Ethics  
**Sent:** Friday, August 13, 2021 11:10 AM  
**To:** [REDACTED]  
**Subject:** Notice of Intention to Amend LADWP's Conflict of Interest Code

To All Current and Potential LADWP Officials/Required Filers and representing Employee Organization/Associations,

Per the Political Reform Act of 1974, state and local government agencies are required to adopt and promulgate conflict of interest codes (code), and to periodically update and amend their Conflict of Interest Codes (code) to ensure they reflect the agency's current organizational structure. Codes identify public officials that make or participate in making the agency's governmental decisions and require such officials to disclose specific categories of personal financial interests to avoid or otherwise identify potential conflicts of interest. For the purpose of these codes, City public officials may consist of employees, commissioners, board members, and consultants.

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The following documents are attached to this email for your review:

- Notice of Intention to Amend the Conflict of Interest Code of LADWP;
- LADWP's Current COI Code (Schedule A and Schedule B);
- LADWP's Proposed Designated Positions (Schedule A) - lists the positions LADWP proposes to identify as City officials (as defined by law and set forth in subdivision [a] of Section 87302 of the Government Code);
- LADWP's Proposed Disclosure Categories (Schedule B) - defines the financial interests

for each disclosure category that must be disclosed (reported) on a personal financial disclosure form (FPPC Form 700 - Statement of Economic Interests); and

- LADWP's Frequently Asked Questions (FAQ) for LADWP's Conflict of Interest Code Revision.

For questions or additional information, please contact the LADWP Ethics Liaison at



**From:** [Mendez, Veronica C.](#)  
**To:** [Ethics](#)  
**Cc:** [Carranceja, Ramonette](#)  
**Subject:** RE: Notice of Intention to Amend LADWP's Conflict of Interest Code  
**Date:** Wednesday, August 25, 2021 3:29:59 PM

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Hi Sherry,

I gave the info to Linda, she is requesting all info for Board Members goes through the UES; however, the UES will follow-up with the board member to ensure compliance. There will not be tracking of the email delivery.

Thanks,  
VM

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**From:** Ethics  
**Sent:** Wednesday, August 25, 2021 2:42 PM  
**To:** Mendez, Veronica C. [REDACTED]  
**Subject:** RE: Notice of Intention to Amend LADWP's Conflict of Interest Code

Hi Veronica. This is Sherry. I'll call you in a few mins. Thx! sm

---

**From:** Mendez, Veronica C.  
**Sent:** Wednesday, August 25, 2021 8:54 AM  
**To:** Ethics [REDACTED]  
**Subject:** FW: Notice of Intention to Amend LADWP's Conflict of Interest Code

Hello Ethics Office,

Can someone call me, please? I have a question about this email.

[REDACTED]

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**From:** Ethics  
**Sent:** Friday, August 13, 2021 11:08 AM  
**To:** [REDACTED] Bogin, LaTanya [REDACTED]; Felix, Adolfo (water)  
[REDACTED]  
**Subject:** Notice of Intention to Amend LADWP's Conflict of Interest Code

To All Current and Potential LADWP Officials/Required Filers and representing Employee Organization/Associations,

Per the Political Reform Act of 1974, state and local government agencies are required to adopt and promulgate conflict of interest codes (code), and to periodically update and amend their Conflict of Interest Codes (code) to ensure they reflect the agency's current

organizational structure. Codes identify public officials that make or participate in making the agency's governmental decisions and require such officials to disclose specific categories of personal financial interests to avoid or otherwise identify potential conflicts of interest. For the purpose of these codes, City public officials may consist of employees, commissioners, board members, and consultants.

This email informs you that:

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- As an individual whose position title is listed in LADWP's proposed code, you may be a public official that may be required to complete the aforementioned personal financial disclosures; and
- A third public comment period has been established starting on Monday, August 16, 2021 and ending on Wednesday, September 15, 2021 (a 30-day period). Comments will be accepted in writing only and those received within this comment period will be evaluated.

The following documents are attached to this email for your review:

- Notice of Intention to Amend the Conflict of Interest Code of LADWP;
- LADWP's Current COI Code (Schedule A and Schedule B);
- LADWP's Proposed Designated Positions (Schedule A) - lists the positions LADWP proposes to identify as City officials (as defined by law and set forth in subdivision [a] of Section 87302 of the Government Code);
- LADWP's Proposed Disclosure Categories (Schedule B) - defines the financial interests for each disclosure category that must be disclosed (reported) on a personal financial disclosure form (FPPC Form 700 - Statement of Economic Interests); and
- LADWP's Frequently Asked Questions (FAQ) for LADWP's Conflict of Interest Code Revision.

For questions or additional information, please contact the LADWP Ethics Liaison at





**From:** [Nwosu, Tia](#)  
**To:** [Ethics](#)  
**Subject:** Questions from Communications and Public Affairs  
**Date:** Tuesday, August 31, 2021 1:13:27 PM  
**Attachments:** [image001.png](#)

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Hello,

Is there anyway to find out the reporting standard for Public Relations Specialists in the City?  
If an employee reports for another agency are they required to do so for LADWP?

Thank you,

TIA NWOSU  
Administrative Manager  
Communications and Public Affairs  
Legislative and Intergovernmental Affairs



SCHEDULE "A"  
DESIGNATED POSITIONS

DEPARTMENT OF WATER AND POWER  
CONFLICT OF INTEREST CODE

CLASS CODE	DDR NUMBER	WORKING TITLE	APPLICABLE CATEGORY
		COMMISSIONER	1
9739	01-97104	SECRETARY - WATER AND POWER COMMISSION	1
9998	02-99002	GENERAL MANAGER AND CHIEF ENGINEER	1
CAO-9409	02-09909	ASSISTANT GENERAL MANAGER	1
7 0360	02-09910	EXECUTIVE ASSISTANT TO THE GENERAL MANAGER	1
9185	91-17114	STAFF ASSISTANT TO THE GENERAL MANAGER	1
9101	02-17119	LEGISLATIVE ASSISTANT	1
9149	05-00001	ADMINISTRATOR, WATER AND POWER RETIREMENT PLAN	2,4
9415	05-94102	ASSISTANT ADMINISTRATOR, RETIREMENT PLAN	2,4
	05-	EMPLOYEE MEMBERS, BOARD OF ADMINISTRATION, RETIREMENT PLAN	2,4
9557	10-01710	INDUSTRIAL RELATIONS ADMINISTRATOR	2,4,5,8
9556	91-17008	ASSISTANT INDUSTRIAL RELATIONS ADMINISTRATOR	2,4,5,8
1712	10-17104	MANAGER, LABOR RELATIONS AND COMPENSATION	2,4,8
1744	10-17113	MANAGER, EMPLOYEE DEVELOPMENT	4
1777	91-17112	WORKER'S COMPENSATION OFFICER	4,5
9556	10-17011	MANAGER, PERSONNEL SERVICES	4,8
9376	22-14018	DEPUTY DIRECTOR, MANAGEMENT INFORMATION SERVICES	1
9377	22-14049	MANAGER OF SYSTEMS AND PROGRAMMING	4
2334	10-02301	MEDICAL DIRECTOR	4,5
0590	10-02302	ASSISTANT MEDICAL DIRECTOR	4,5
9528	15-17108	DIRECTOR OF PUBLIC AFFAIRS	4
1950	17-19103	CHIEF LAND OFFICER	3,4
1958	17-19129	ASSISTANT CHIEF LAND OFFICER	3,4
1772	19-17004	CLAIMS AGENT	4,5

Schedule "A" - Designated Positions

<u>CLASS CODE</u>	<u>DDR NUMBER</u>	<u>WORKING TITLE</u>	<u>APPLICABLE CATEGORY</u>
1773	19-17103	ASSISTANT CLAIMS AGENT	4,5
9759	20-01503	AUDITOR (CHIEF FINANCIAL OFFICER)	1
9655	23-15119	CHIEF ACCOUNTANT	1
1531	20-15112	ASSISTANT TO CHIEF FINANCIAL OFFICER-- BUDGET, FINANCIAL PLANNING AND RATES	4,6
7539	20-75002	RATES ADMINISTRATION AND ANALYSIS MANAGER	6
1531	21-15108	CHIEF INTERNAL AUDITOR	1
1521	21-15109	SENIOR INTERNAL AUDITOR, GENERAL ACCOUNTS	1
1531	23-15125	STAFF SERVICES ACCOUNTANT	4
1531	92-15131	SUPERVISOR OF ADMINISTRATIVE SERVICES AND RISK MANAGEMENT	4
1531	92-15130	SUPERVISOR, COST AND PLANT ACCOUNTING	4
1531	92-15132	SUPERVISOR OF GENERAL ACCOUNTING	2,4
1521	23-15108	CONSTRUCTION PROJECT COST ACCOUNTANT	2,4
9489	25-16035	DIRECTOR, CUSTOMER SERVICES	2,3,4,5
9155	25-16132	ASSISTANT CUSTOMER SERVICES DIRECTOR	2,3,4,5
9159	66-16213	DIRECTOR OF CONSERVATION AND UTILITY SERVICES	2,4,6
9679	27-18011	PURCHASING AGENT	2,4
1857	27-18108	ASSISTANT PURCHASING AGENT	2,4
1862	27-18007	SUPERVISOR, MAJOR PROCUREMENT	2,4
1862	27-18007	ASSISTANT SUPERVISOR, MAJOR PROCUREMENT	2,4
1862	27-18008	SUPERVISOR, INFORMAL CONTRACTS	2,4
1862	27-18008	ASSISTANT SUPERVISOR, INFORMAL CONTRACTS	2,4
1159	91-18109	TRAFFIC AGENT	4
9905	30-07203	CHIEF ENGINEER OF WATER WORKS AND ASSISTANT MANAGER	1
9903	30-07202	ASSISTANT CHIEF ENGINEER OF WATER WORKS	1
9409	30-72126	EXECUTIVE ASSISTANT TO THE CHIEF ENGINEER OF WATER WORKS	2,3,4,5,7
9409	34-72177	ENGINEER OF DESIGN	2,3,4,5

Schedule "A" - Designated Positions

<u>CLASS CODE</u>	<u>DDR NUMBER</u>	<u>WORKING TITLE</u>	<u>APPLICABLE CATEGORY</u>
9409	34-72178	ASSISTANT ENGINEER OF DESIGN - PROJECT DESIGN AND INSPECTION	2,3,4,5
9409	93-72178	ASSISTANT ENGINEER OF DESIGN - WATER ENGINEERING DESIGN	2,3,4,5
9409	38-72109	ENGINEER IN CHARGE OF AQUEDUCT DIVISION	2,3,4,5
9405	38-72134	ASSISTANT ENGINEER, AQUEDUCT DIVISION SENIOR ENGINEER, NORTHERN DISTRICT	2,3,4,5
9405	38-72135	SENIOR ENGINEER, SOUTHERN DISTRICT	2,3,4,5
9405	30-72127	SENIOR WATER WORKS ENGINEER	2,3,4,5
9409	42-72121	ENGINEER OF OPERATING, WATER OPERATING DIVISION	2,3,4,5
9409	42-72032	ASSISTANT ENGINEER OF WATER OPERATING	2,3,4,5
9409	52-78029	PRINCIPAL SANITARY ENGINEER	2,3,4,5
7874	52-78037	SENIOR SANITARY ENGINEER - ASSISTANT DIVISION HEAD	2,3,4,5
9601	45-75100	GENERAL SERVICES MANAGER	2,5
9601	45-75007	ASSISTANT GENERAL SERVICES MANAGER	2,5
9405	45-72103	SENIOR CONSTRUCTION ENGINEER AND ASSISTANT GENERAL SERVICES MANAGER	2,5
1850	45-18150	STORES SUPERINTENDENT	4
1850	45-18124	ASSISTANT STORES SUPERINTENDENT	4
9805	60-07503	CHIEF ELECTRICAL ENGINEER AND ASSISTANT MANAGER	1
9803	60-07501	ASSISTANT CHIEF ELECTRICAL ENGINEER	2,3,4,5,6,7
9479	62-75001	ENGINEER OF SYSTEM DEVELOPMENT	2,3,4,5,6,7
9450	62-75029	SENIOR RESOURCES CONTRACTS ENGINEER	2,3,4,5,6,7
9479	62-75019	ASSISTANT ENGINEER OF SYSTEM DEVELOPMENT	2,3,4,5,6,7
9479	72-07502	ENGINEER OF DESIGN AND CONSTRUCTION (POWER SYSTEM)	2,3,4,5,6
9479	72-75430	ASSISTANT ENGINEER OF DESIGN AND CONSTRUCTION	2,3,4,5,6
9489	72-72057	ENGINEER OF CIVIL AND STRUCTURAL DESIGN AND ENGINEERING SERVICES	3,4

Schedule "A" - Designated Positions

<u>CLASS CODE</u>	<u>DDR NUMBER</u>	<u>WORKING TITLE</u>	<u>APPLICABLE CATEGORY</u>
9479	72-75136	ENGINEER OF CONSTRUCTION	3,4,5
9459	72-75326	ENGINEER OF MECHANICAL DESIGN	3,4
9479	72-75363	ENGINEER OF STATION ELECTRICAL DESIGN	3,4
9479	72-75415	ENGINEER OF TRANSMISSION AND DISTRIBUTION ELECTRICAL DESIGN	3,4
9451	72-75396	NUCLEAR POWER PLANT PROJECT MANAGER (and COAL-FUELED PROJECTS MANAGER, formerly ALLEN PROJECT MANAGER, DDR 72-75424)	3,4
9479	82-07501	ENGINEER OF OPERATION AND MAINTENANCE	3,4,5,6,7
9451	82-75124	ASSISTANT ELECTRICAL ENGINEER IN CHARGE OF OPERATION and ENGINEER OF DISTRIBUTION (DDR 82-75049)	3,4,5,6,7
9479	82-75153	ENGINEER OF GENERATION	4
9479	82-75103	ENGINEER OF TRANSMISSION AND COMMUNICATION	3,4
9451	82-75033	ENGINEER OF SYSTEMS OPERATIONS (ENGINEER IN CHARGE OF SUBSTATION AND MAINTENANCE OPERATIONS)	7
9450	94-75006	FUEL SUPPLY ADMINISTRATOR	4
9450	60-75117	ENGINEER OF GOVERNMENTAL COORDINATION	4

Agency Report of:  
New Positions

A Public Document

California  
Form **804**

1. Agency Name (Also include, Division, Department, or Region (if applicable))

Los Angeles Department of Water and Power - Power System

☐ Amendment

Date of Original Filing: 01.28.16  
(month, day, year)

Agency Contact (Last Name, First Name, Title)

Sherry Morimoto, Department Ethics Liaison

Area Code/Phone Number

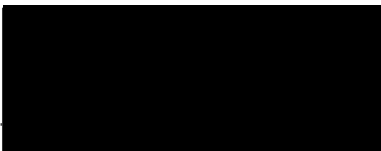
E-mail

2. New Position Information

Position Title/Classification and Job Summary	Assigned Category	OR Disclosure Requirement	Assuming/Start Date (Optional)
Executive Director of Power System/Power Engineering Manager	1	Provide Power System executive oversight and report directly to the General Manager.	Start <u>07</u> / <u>06</u> / <u>15</u> d / m / yr
Executive Director of Power System/Electrical Service Manager	1	Provide Power System executive oversight and report directly to the General Manager.	Start <u>07</u> / <u>06</u> / <u>15</u> d / m / yr
			Start <u>  </u> / <u>  </u> / <u>  </u> d / m / yr
			Start <u>  </u> / <u>  </u> / <u>  </u> d / m / yr
			Start <u>  </u> / <u>  </u> / <u>  </u> d / m / yr
			Start <u>  </u> / <u>  </u> / <u>  </u> d / m / yr
			Start <u>  </u> / <u>  </u> / <u>  </u> d / m / yr

3. Verification

I have read and understand FPPC Regulations 18701 and 18734. I have verified that the disclosure assignment(s) set forth above, is in



Marcie L. Edwards

Print Name

General Manager

Title

1-28-16  
(month, day, year)

Comment: (Use this space or an attachment for any additional information.)

gm 1.25.16

FPPC Form 804 (9/11)  
FPPC Toll-Free Helpline: 866/ASK-FPPC (866/275-3772)

SCHEDULE "B"  
DISCLOSURE CATEGORIES

DEPARTMENT OF WATER AND POWER  
CONFLICT OF INTEREST CODE

GENERAL PROVISION

Income is disclosable pursuant to Section 302.B (2) or (3) when the person from whom the income is received is of the type listed in the category to which the designated employee's position is assigned.

As used herein except as otherwise provided, the terms "investment", "income", "interest in real property", and "business entity" are defined as provided in this Conflict of Interest Code.

CATEGORY 1

- A. Any investment, as defined by this Code.
- B. Any interest in real property located within the City of Los Angeles, or not more than two miles outside the boundaries of the City, or not more than two miles from any real property owned or used by the Department of Water and Power.
- C. Income from any individual who is or during the past twelve months was employed by the Department.
- D. Income from any person or business entity which:
  - 1. Is in the banking or investment underwriting business;
  - 2. Manages retirement or disability plans;
  - 3. Conducts bond or investment or management counseling;

4. Conducts accounting and financial auditing services;
5. The Water and Power Retirement Plan may legally invest its funds. (This item applies only to those Commissioners who also serve on the Board of Administration);
6. Sells, leases or rents interests in real property to the Department of Water and Power, or purchases interests in real property from the Department of Water and Power, or appraises real property, or examines or insures real property titles;
7. Supplies materials or equipment to the Department of Water and Power; enters into contracts for design, construction or manufacture for the Department of Water and Power, or any direct competitor of such person or business entity;
8. Provides professional, scientific, expert or technical consulting services or maintenance services to the Department of Water and Power, or any direct competitor of such person or business entity;
9. Provides or manages any health insurance plan;
10. Provides retail collection services for the Department of Water and Power;



11. Filed a claim for money, damages or other relief against the Department of Water and Power which was pending during the past twelve months;
12. During the past twelve months was a party to any litigation involving the Department of Water and Power;
13. Is an insurance company, with the exception of any company which issues title insurance only;
14. Purchases surplus electrical energy from the Department of Water and Power, or which produces for sale or sells electrical energy.

E. In any case in which the Board of Water and Power Commissioners considers any matter which may foreseeably have any effect on a financial interest of a member of the Commission, such member shall promptly announce the nature of his or her interest, and said announcement shall be recorded in the minutes of the meeting. In addition, such member shall file with the Commission Secretary a written notice of the nature of his or her interest, which notice shall become a public record. This requirement shall be in addition to any other requirement of this Code.

#### CATEGORY 2

A. Any investment in or income from any person or business entity which is in the banking or investment underwriting business; manages retirement and disability plans; conducts bond or investment or management counseling; or conducts accounting and financial auditing services.

B. Any interest in real property, or investment in or income from any business entity, in which the Water and Power Retirement Plan is permitted to legally invest its funds. (Item B applies only to those designated employees who serve on the Board of Administration).

CATEGORY 3

A. Any investment in or income from any person or business entity which sells, leases or rents interests in real property to the Department of Water and Power, or purchases interests in real property from the Department of Water and Power, or appraises real property, or examines or insures real property titles.

B. Any interest in real property located within the City of Los Angeles or not more than two miles from any real property owned or used by the Department of Water and Power.

CATEGORY 4

A. Any investment in or income from any person or business entity which supplies materials or equipment of the type used by the particular unit of the Department of Water and Power to which a particular designated employee is assigned; enters into contracts for design, construction or manufacture for the Department of Water and Power; or provides professional, scientific, expert or technical consulting services or maintenance services to the Department of Water and Power, or any direct competitor of such person or business entity described above; or

provides or manages any health insurance plan. (A list of such items is available at the Office of the Conflict of Interest Compliance Officer).

B. Any investment in or income from any person or business entity which provides retail collection services.

CATEGORY 5

A. Any investment in or income from any person or business entity which filed a claim for money, damages or other relief against the Department of Water and Power which was pending during the past twelve months and pertains to a matter involving the System in which designated employee is employed.

B. Any investment in or income from any person or business entity which during the past twelve months was a party to any litigation involving the Department of Water and Power and pertaining to a matter involving the System in which designated employee is employed.

C. Any investment in or income from an insurance company, with the exception of any company which issues title insurance only.

CATEGORY 6

Any investment in or income from any business entity or non-profit organization which purchases electrical energy or water or associated services from the Department

of Water and Power in an annual amount in excess of  
3 gigawatt-hours of electrical energy or an annual amount  
in excess of 25,000,000 cu. ft. of water or which produces  
for sale or sells electrical energy.

CATEGORY 7

Any investment in or income from any person or  
business entity which produces for sale or sells electrical  
energy.

CATEGORY 8

Any income from an individual who is or during  
the past twelve months was employed by the Department of  
Water and Power.