

**TURLOCK IRRIGATION DISTRICT
CONFLICT OF INTEREST CODE**

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

Individuals holding designated positions shall file their statements of economic interests with the **District** who will make the statements available for public inspection and reproduction (Gov. Code Section 81008). Statements for all designated employees will be retained by the **District**.

**TURLOCK IRRIGATION DISTRICT
CONFLICT OF INTEREST CODE
EXHIBIT "A"**

**DESIGNATED POSITION AND ASSIGNED
CATEGORIES OF DISCLOSURE**

| DESIGNATED POSITON | ASSIGNED DISCLOSURE CATEGORIES |
|--|--------------------------------|
| Accounting Department Manager | 5 |
| Accounting Division Manager | 5 |
| Accounting Standards Manager | 5 |
| Administrative Assistant | 3 |
| Aquatic Biologist I-II | 3 |
| Area Manager | 1 |
| Assistant Civil Engineer | 1, 2 |
| Assistant Electrical Engineer | 1, 2 |
| Assistant General Counsel | 1, 2, 4 |
| Assistant General Manager- Consumer Services | 1, 2, 4 |
| Assistant General Manager – Electrical Engineering & Operations | 1, 2, 4 |
| Assistant General Manager External Affairs | 1, 2, 4 |
| Assistant General Manager - Power Supply | 1, 2, 4 |
| Assistant General Manager - Resource Management, Planning & Rates | 1, 2, 4 |
| Assistant General Manager - Water Operations, Construction & Maintenance | 1, 2, 4 |
| Assistant General Manager – Water Resources | 1, 2, 4 |
| Assistant Power Generation Engineer | 3 |
| Associate Civil Engineer | 1, 2 |

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|--|---------|
| Associate Electrical Engineer | 1, 2 |
| Benefits Coordinator | 3, 4 |
| Buyer | 1 |
| Cashiering Division Manager | 1 |
| Chief Dam Safety Engineer | 2, 3 |
| Civil Engineering Department Manager | 1, 2, 4 |
| Combustion Turbine Department Manager | 1 |
| Communications Division Manager | 3 |
| Communications Specialist I-II | 3 |
| Construction & Maintenance Department Manager | 1 |
| Construction Division Manager | 3 |
| Consumer Programs Division Manager | 3 |
| Consumer Programs Specialist | 2, 3 |
| Control System Cybersecurity Analyst | 3 |
| Credit & Collections Manager | 3, 5 |
| Customer Service Division Manager | 3 |
| Customer Service Manager | 3 |
| Customer Service Department Manager | 3 |
| Director of Energy Markets | 1, 2 |
| Director of External Affairs | 1, 4 |
| Director of Human Resources | 3, 4 |
| Director of Water Resources & Regulatory Affairs | 1, 2, 4 |
| Electrical Engineering & Operations Department Manager | 1, 2, 4 |
| Electronic Supervisor | 3 |

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| Energy Markets Department Manager | 1, 2, 4 |
| Energy Trader I-II | 3, 5 |
| Energy Settlements & Trading Support Division Manager | 3, 5 |
| Energy Specialist Senior | 3 |
| Energy Strategy Department Manager | 3 |
| Engineering Tech. – Civil I, II (under Surveying/Right of Way Manager) | 2, 3 |
| Engineering Technician Senior – Civil Engineering | 1, 2 |
| Engineering Technician Senior- Electric Engineering | 1, 2 |
| Engineering Technician Senior – La Grange | 1, 2 |
| Engineering Technician Senior – Surveying | 1, 2 |
| Environmental Health & Safety Specialist | 3, 4 |
| Equipment Operations Division Manager | 1 |
| Equipment Operations & Pest Control Division Manager | 1 |
| Executive Assistant to the General Manager | 3 |
| Executive Secretary to the Board | 3 |
| Facilities Division Manager | 3 |
| Field Services Division Manager | 2, 3 |
| Finance Manager | 3, 5 |
| Financial Reporting Manager | 3, 5 |
| Fleet & Plant Services Analyst | 3 |
| Fleet & Plant Services Division Manager | 3 |
| Fleet & Plant Services Supervisor | 3 |
| General Counsel | 1, 2, 4 |

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| Governmental Affairs Manager | 1 |
| Gunitite & Pipeline Division Manager | 3 |
| Human Resources Analyst I-II | 3, 4 |
| Human Resources Coordinator | 3, 4 |
| Hydroelectric Department Manager | 1 |
| Hydroelectric Division Manager | 3 |
| Information Technology (IT) Business Analyst | 3 |
| Information Technology (IT) Network Engineer I, II, Senior | 3 |
| Information Technology (IT) Service Desk Supervisor | 3 |
| Information Technology (IT) Services Applications Manager | 3 |
| Information Technology (IT) Services Department Manager | 1 |
| Information Technology (IT) Services Operations Manager | 3 |
| Information Technology (IT) Services Project Analyst I, II, Senior | 3 |
| Information Technology (IT) Security Analyst I, II, Senior | 1 |
| Inventory Specialist | 1 |
| Job Scheduling Supervisor | 3 |
| Legislative Analyst | 3 |
| Line Department Manager | 1, 2 |
| Line Division Manager | 3 |
| Maintenance & Operations Department Manager | 1 |
| Manager of Security & Emergency Preparedness | 1, 4 |
| Materials Management Department Manager | 1 |
| Metering Division Manager | 3 |

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| Park Maintenance Division Manager | 3 |
| Parts Specialist | 3 |
| Payroll Accountant | 5 |
| Pest Control Manager | 3 |
| Power Control Center Division Manager | 3 |
| Power Control Center Operator | 3 |
| Power Control Center Shift Supervisor | 3 |
| Power Plant Engineering Department Manager | 1, 2 |
| Power Plant Regulatory Compliance Officer | 1 |
| Power Plant Supervisor – Combined Cycle | 3 |
| Principal Engineering Technician – Electrical Engineering | 1, 2 |
| Public Benefits Program Analyst | 3 |
| Public Information Officer | 1, 4 |
| Pump Repair Supervisor | 1 |
| Purchasing Division Manager | 1 |
| Purchasing Supervisor | 1 |
| Purchasing Technician | 1 |
| Recreation Department Manager | 1, 2, 4 |
| Recreation Division Manager | 1, 4 |
| Regulatory Analyst I, II | 3 |
| Resource Planning Department Manager | 1 |
| Safety, Security & Environmental Resources Division Manager | 3, 4 |
| Senior Accountant | 5 |

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|--|------|
| Senior Buyer I, II | 1 |
| Senior Civil Engineer | 1, 2 |
| Senior Electrical Engineer | 1, 2 |
| Service Division Supervisor | 3 |
| Strategic Issues & Planning Department Manager | 1, 2 |
| Substation & Communications Division Manager | 1 |
| Substation Supervisor | 3 |
| Supervising Engineering Tech. – Civil Engineering | 1, 2 |
| Supervising Engineering Tech. – Electrical Engineering | 1, 2 |
| Surveying/Right of Way Manager | 1, 2 |
| Trading & Scheduling Department Manager | 1 |
| Trading & Scheduling Division Manager | 1 |
| Transportation & Facilities Department Manager | 1 |
| Treasurer | 1, 4 |
| Utility Analyst I-II– Energy Markets | 1 |
| Utility Analyst I-II – Resource Planning | 1 |
| Utility Analyst I-II – Water Resources | 1 |
| Warehouse Supervisor | 1 |
| Water & Energy Management System Supervisor | 3 |
| Water Distribution Department Manager | 3 |
| Water Operations Manager | 3 |
| Water Planning Department Manager | 1, 2 |
| Water Records Manager | 3 |
| Water Resources Analyst I-II | 3 |

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| | |
|------------------------------------|---|
| Water Treatment Department Manager | 3 |
| Consultants/New Positions | * |

Note: The positions of General Counsel and Assistant General Counsel are filled by outside consultants, but act in a staff capacity for the District.

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

The General Manager may determine in writing that a particular consultant or new position, 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 described in this section. Such written determination shall include a description of the consultant’s or new position’s duties and, based upon that description, a statement of the extent of disclosure requirements. The General Manager’s determination is a public record and shall be retained for public inspection in the same manner and location as this conflict of interest code (Gov. Code Sec. 81008).

Public Officials Who Manage Public Investments

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

- Directors
- General Manager
- Assistant General Manager – Financial Services/Chief Financial Officer
- Risk & Investment Analyst

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

TURLOCK IRRIGATION DISTRICT
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EXHIBIT "B"
DISCLOSURE CATEGORIES

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

Category 2: Interests in real property located within the jurisdiction or within two miles of the boundaries of the jurisdiction or within two miles of any land owned or used by the District as well as investments and business positions in business entities, and sources of income, including loans, gifts, and travel payments, from sources, that provide real estate consulting or development services of the type utilized by the District.

Category 3: Investments and business positions in business entities, and sources of income, including loans, gifts, and travel payments, from sources, that provide services, supplies, materials, machinery, or equipment of the type purchased or leased by the department or division in which the designated position works.

Category 4: Investments and business positions in business entities, and sources of income, including loans, gifts, and travel payments, from sources, that filed a claim, or have a claim pending, against the District during the previous two years.

Category 5: Investments and business positions in business entities, and sources of income, including loans, gifts, and travel payments, from sources, of the type to provide financial or insurance services, including, but not limited to, banks, savings and loans, insurance agents, auditors, accountants, and financial hedges and derivatives.

This is the last page of the conflict of interest code for **Turlock Irrigation District**.



CERTIFICATION OF FPPC APPROVAL

Pursuant to Government Code Section 87303, the conflict of interest code for **Turlock Irrigation District** was approved on 12/15/ 2016. This code will become effective on 1/14/ 2017.

A handwritten signature in black ink, appearing to be "B. Lau", written over a horizontal line.

Brian G. Lau
Senior Commission Counsel
Fair Political Practices Commission