

RESOLUTION NO. 2026-11

A RESOLUTION OF THE BOARD OF DIRECTORS OF SAN DIEGO COMMUNITY POWER ADOPTING A REVISED CONFLICT OF INTEREST CODE PURSUANT TO THE POLITICAL REFORM ACT OF 1974.

THE BOARD OF DIRECTORS OF SAN DIEGO COMMUNITY POWER DOES HEREBY FIND, RESOLVE, AND ORDER AS FOLLOWS:

- A. San Diego Community Power ("Community Power") is a joint powers agency formed pursuant to the Joint Exercise of Powers Act (Cal. Gov. Code § 6500 *et seq.*), California Public Utilities Code § 366.2, and a Joint Powers Agreement effective on October 1, 2019, and amended and restated December 16, 2021 ("JPA Agreement").
- B. The State of California enacted the Political Reform Act of 1974, Government Code Section 81000 *et seq.* (the "Act"), which contains provisions relating to conflicts of interest that potentially affect all officers, employees, and consultants of the San Diego Community Power (Community Power) Governing Board (the Governing Board), and requires all public agencies to adopt and promulgate a conflict of interest code.
- C. The potential penalties for violation of the provisions of the Act are substantial and may include criminal and civil liability, as well as equitable relief which could result in Community Power being restrained or prevented from acting in cases where the provisions of the Act may have been violated.
- D. The Board of Directors previously adopted a Conflict of Interest Code on April 23, 2020, amended such Code on August 22, 2024, and now desires to amend said Code again.
- E. Notice of the time and place of a public meeting, and of consideration by the Board of Directors, of the proposed Conflict of Interest Code was provided to each designated position, and publicly posted for review at the offices of Community Power.
- F. A public meeting was held upon the proposed Conflict of Interest Code at a regular meeting of the Board of Directors on August 27, 2026, at which all present were given an opportunity to be heard on the proposed Conflict of Interest Code

NOW, THEREFORE, BE IT RESOLVED that the said Conflict of Interest Code shall be submitted to the Board of Supervisors of the County of San Diego for approval and said Code shall become effective 30 days after the Board of Supervisors approves the proposed Conflict of Interest Code as submitted.

- 1. This resolution shall take effect immediately upon its adoption and shall remain in effect except as amended or until repealed by the Board of Directors.

PASSED, APPROVED AND ADOPTED at a meeting of the Board of Directors of San Diego Community Power held on August 27, 2026.

AYES: CHAIR LAWSON-REMER, VICE CHAIR YAMANE, DIRECTORS FISHER, INZUNZA AND SUZUKI

NOES: NONE

ABSTAIN: NONE

ABSENT: ELO-RIVERA AND SAN ANTONIO



Terra Lawson-Remer, Chair
Board of Directors
San Diego Community Power

ATTEST:

APPROVED AS TO FORM:



Maricela Hernandez, MMC, CPMC
Clerk of the Board/Board Secretary
San Diego Community Power



[Veera Tyagi \(Aug 28, 2026 16:09:26 PDT\)](#)

Veera Tyagi, General Counsel
San Diego Community Power

CONFLICT OF INTEREST CODE

OF

SAN DIEGO COMMUNITY POWER

CONFLICT OF INTEREST CODE OF SAN DIEGO COMMUNITY POWER

(Adopted August 27, 2026)

The Political Reform Act (Gov. Code § 81000, et seq.) requires state and local government agencies to adopt and promulgate conflict of interest codes. The Fair Political Practices Commission has adopted a regulation (2 Cal. Code of Regs. § 18730) that contains the terms of a standard conflict of interest code which can be incorporated by reference in an agency's code. After public notice and hearing Section 18730 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 (attached) and the attached Appendix designating officials and employees and establishing disclosure categories, shall constitute the Conflict of Interest Code of **San Diego Community Power (Community Power)**.

All officials and designated positions required to file a Statement of Economic Interests shall file their statements with the Clerk of the Board as Community Power's Filing Officer, unless the official is required to file their statements directly with the Fair Political Practices Commission (FPPC). The Clerk of the Board shall retain a copy of all statements filed with the FPPC. The Clerk of the Board shall retain the original statements filed by all other officials and designated positions and will make all retained statements available for public inspection and reproduction during regular business hours. (Gov. Code § 81008.)

APPENDIX

CONFLICT OF INTEREST CODE OF

SAN DIEGO COMMUNITY POWER

(Adopted August 27, 2026)

PART “A”

OFFICIALS WHO MANAGE PUBLIC INVESTMENTS

Officials who manage public investments, as defined by 2 Cal. Code of Regs. §18700.3(b), are NOT subject to Community Power’s Code but must file disclosure statements under Government Code Section 87200 et seq. [Regs. § 18730(b)(3)]

It has been determined that the positions listed below are Officials who manage public investments¹. These positions are listed here for informational purposes only.

Board of Directors
Chief Executive Officer
Chief Financial Officer/Treasurer
General Counsel
Chief Operating Officer
Chief Commercial Officer
Investment Consultant

¹ Individuals holding one of the above-listed positions may contact the Fair Political Practices Commission for assistance or written advice regarding their filing obligations if they believe that their position has been categorized incorrectly. The Fair Political Practices Commission makes the final determination whether a position is covered by § 87200.

DESIGNATED POSITIONS

GOVERNED BY THE CONFLICT OF INTEREST CODE

DESIGNATED POSITIONS' **TITLE OR FUNCTION**

DISCLOSURE CATEGORIES **ASSIGNED**

Department	Designated Position	Disclosure Categories
Clerk of the Board	Clerk of the Board	5
	Assistant Clerk of the Board	5
Finance	Senior Director of Finance and Risk	1
	Associate Director of Finance – Capital Investment Plan	1
	Associate Director of Strategic Finance and Procurement	1
	Finance Manager	5
	Procurement Manager	5
	Risk Manager	5
	Senior Financial Analyst	5
	Financial Analyst	5
	Procurement Analyst	5
IT Data Analytics and Customer Operations	Senior Director of Data Analytics and Customer Operations	1
	Associate Director of IT and Data Analytics	1
	Account Services Manager	5
	IT Manager	5
	Information Systems (IS) Manager	5
	Key Account Services Manager	5
	Rates and Strategy Manager	5
	Senior Data Analytics Manager	5
	Senior Data Engineer	5
	Senior Data Scientist	5
	Senior Cyber Security Analyst	5
	Senior Rates Analyst	5
	IT Systems Engineer	5
	Data Engineer	5
	Data Analyst	5
	IT Systems Analyst	5
	Account Services Analyst	5
	Key Account Services Analyst	5
	Rates Analyst	5
General Counsel	Assistant General Counsel	1
	Senior Counsel	1
	Paralegal	5

People Operations and Administration	Senior Director of People Operations and Administration	1
	Senior Human Resources Manager	5
	Facilities Manager	5
	Senior Executive Assistant	5
	Talent Acquisition and Learning Specialist	5
	Human Resources Analyst	5
	Executive Assistant	5
Office of Strategic Initiatives	Associate Director of Strategic Partnerships	1
	Local Government Affairs Manager	5
	Project Management Office Manager	5
Power Services	Senior Director of Power Contracts	1
	Director of Origination	1
	Director of Portfolio Management	1
	Associate Director of Settlements	1
	Senior Local Development Manager	5
	Senior Portfolio Manager	5
	Senior Manager of Origination	5
	Load Forecast Manager	5
	Power Contract and Compliance Manager	5
	Principal Portfolio Manager	5
	Quantitative Energy Manager	5
	Senior Origination Associate	5
	Senior Settlements Analyst	5
	Portfolio Analyst	5
	Compliance and Contract Management Analyst	5
	Power Contract Coordinator	5
Programs	Senior Director of Programs	1
	Associate Director of Programs	1
	Senior Program Manager	5
	Program Manager	5
	Senior Program Associate	5
	Program Associate	5
Public Affairs	Senior Director of Public Affairs	1
	Associate Director of Strategic Communications and Marketing	1
	Senior Community Engagement Manager	5
	Community Engagement Manager	5
	Marketing and Communications Project Manager	5
	Marketing Manager	5
	Community Engagement Associate	5
	Communications Associate	5
	Community Engagement Coordinator	5
	SDREN Outreach Associate	5

Regulatory and Legislative Affairs	Senior Director of Regulatory and Legislative Affairs	1
	Associate Director of Legislative Affairs	1
	Senior Policy Manager	5
	Senior Strategic Policy Manager	5
	Regulatory Manager	5

MEMBERS AND ALTERNATES OF BOARDS, COMMITTEES & WORKING GROUPS

DISCLOSURE CATEGORIES

Community Advisory Committee	1, 2
Energy Contracts Working Group	1, 2

Consultants and New Positions

Individuals serving as a consultant as defined in FPPC Reg. 18700.3(a) or in a new position created since this Code was last approved that makes or participates in making decisions must file under the broadest disclosure set forth in this Code subject to the following limitation:

The Chief Executive Officer may determine that, due to the range of duties or contractual obligations, it is more appropriate to assign a limited disclosure requirement. A clear explanation of the duties and a statement of the extent of the disclosure requirements must be in a written document. (Gov. Code Sec. 82019; FPPC Regulations 18219 and 18734.). The Chief Executive Officer'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.)

PART "B"

DISCLOSURE CATEGORIES

The disclosure categories listed below identify the types of economic interests that the designated position must disclose for each disclosure category to which the designated position is assigned. ² "Investment" means financial interest in any business entity (including a consulting business or other independent contracting business) and are reportable if they are either located in, doing business in, planning to do business in, or have done business during the previous two years in the jurisdiction of **Community Power**.

Category 1: All investments and business positions in business entities, and sources of income, including gifts, loans and travel payments.

Category 2: All interests in real property which is located in whole or in part within, or not more than two (2) miles outside, the boundaries of **Community Power**, including any leasehold, beneficial or ownership interest or option to acquire property.

Category 3: All investments and business positions in business entities, and sources of income, including gifts, loans and travel payments, that are engaged in land development, construction or the acquisition or sale of real property within the jurisdiction of **Community Power**.

Category 4: All investments and business positions in business entities, and sources of income, including gifts, loans and travel payments, that provide services, products, materials, machinery, vehicles or equipment of a type purchased or leased by **Community Power**.

Category 5: All investments and business positions in business entities, and sources of income, including gifts, loans and travel payments, that provide services, products, materials, machinery, vehicles or equipment of a type purchased or leased by the designated position's department, unit or division.

² This Conflict of Interest Code does not require the reporting of gifts from outside this agency's jurisdiction if the source does not have some connection with or bearing upon the functions or duties of the position. (Reg. 18730.1)