

**Conflict of Interest Code of
PIONEER COMMUNITY ENERGY
A California Joint Powers Authority**

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 (FPPC) has adopted a regulation (2 California Code of Regulations Section 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, the standard code may be amended by the FPPC to conform to amendments in the Political Reform Act. Therefore, the terms of 2 California Code of Regulations Section 18730 and any amendments duly adopted by the FPPC are hereby incorporated by reference. This regulation and the attached Appendices, designating positions and establishing disclosure categories, shall constitute the conflict of interest code of Pioneer Community Energy.

As directed by Government Code Section 82011, the code reviewing body is the Fair Political Practices Commission. Pursuant to 2 Cal. Code of Reg s. Section 18227, the Executive Director, or his designee, shall be the official responsible for reviewing and retaining statements of economic interests and making the statements available for public inspection and reproduction.

Individuals holding designated positions shall file their statements of economic interests with Pioneer Community Energy, which will make the statements available for public inspection and reproduction. (See Gov. Code, § 81008.) All statements will be retained by Pioneer Community Energy.

Pioneer Community Energy
Appendix of Designated Positions

Each person holding any position listed below must file statements disclosing the kinds of financial interests shown for the designated employee's position. Statements must be filed at the times and on the forms prescribed by law. Failure to file statements on time may result in penalties including but not limited to, late fines.

Designated Employees	Disclosure Category
Executive Director	1,2,3,4
General Counsel	1,2,3,4
Chief Operating Officer	1,2,3,4
Director of Finance and Administration	1,2,3,4
Director of Power Resources	1,2,3,4
Director of Public Affairs, Marketing, and Programs	1,2,3,4
Director of Regulatory and Legislative Affairs	1,2,3,4
Legislative & Regulatory Manager	1,2,3,4
Power Resources Manager	1,2,3,4
Power Supply Contracts Manager	1,2,3,4
Quantitative Analysis & Modeling Senior Manager	1,2,3,4
Quantitative Analysis & Modeling Manager	1,2,3,4
Consultants*	*

*The Executive Director, after consultation with the General Counsel, shall review the duties and authority of all consultants retained by Pioneer Community Energy. Those consultants who, within the meaning of 2 Cal. Code of Regs. Section 18700, et seq., are required to file statements of economic interests, shall do so. During each calendar year, Pioneer Community Energy shall maintain a list of such consultants for public inspection in the same manner and location as this Conflict of Interest Code. Nothing herein excuses any consultant from any other provision of the Conflict of Interest Code, specifically those dealing with disqualification.

The following positions are not covered by the Conflict of Interest Code because they must file under Government Code Section 87200 and, therefore, are listed for informational purposes only:

Members of the Board of Directors

Members of the Board of Directors (Alternates)

An individual 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 Government Code Section 87200.

Pioneer Community Energy
Appendix of Disclosure Categories

Category 1:

A designated person assigned to Category 1 shall disclose all investments which may foreseeably be materially affected by any decision made or participated in by the designated employee.

Category 2:

A designated person assigned to Category 2 shall disclose all interests in real property which may foreseeably be materially affected by any decision made or participated in by the designated employee.

Category 3:

A designated person assigned to Category 3 shall disclose all income, including receipt of loans, gifts, and travel payments, which may foreseeably be materially affected by any decision made or participated in by the designated employee.

Category 4:

A designated person assigned to Category 4 shall disclose all business positions which may foreseeably be materially affected by any decision made or participated in by the designated employee.

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Individuals holding designated positions shall file their statements of economic interests with Pioneer Community Energy, which will make the statements available for public inspection and reproduction. (See Gov. Code, § 81008.) All statements will be retained by Pioneer Community Energy.

Pioneer Community Energy
Appendix of Designated Positions

List of Designated Positions for Pioneer Community Energy and
Financial Disclosure Categories

Each person holding any position listed below must file statements disclosing the kinds of financial interests shown for the designated employee's position. Statements must be filed at the times and on the forms prescribed by law. Failure to file statements on time may result in penalties including but not limited to, late fines.

Designated Employees	Disclosure Category
Executive Director	1,2,3,4
General Counsel	1,2,3,4
Chief Operating Officer	1,2,3,4
Director of Power Resources	1,2,3,4
Power Resources Manager	1,2,3,4
Director of Regulatory and Legislative Affairs	1,2,3,4
Director of Public Affairs and Marketing	1,2,3,4
Director of Program s	1,2,3,4
Director of Administration and Finance	1,2,3,4
Consultants*	1,2,3,4

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A designated person assigned to Category 2 shall disclose all interests in real property which may foreseeably be materially affected by any decision made or participated in by the designated employee.

Category 3:

A designated person assigned to Category 3 shall disclose all income, including receipt of loans, gifts, and travel payments, which may foreseeably be materially affected by any decision made or participated in by the designated employee.

Category 4:

A designated person assigned to Category 4 shall disclose all business positions which may foreseeably be materially affected by any decision made or participated in by the designated employee.