

**CALIFORNIA ENERGY COMMISSION**1516 Ninth Street  
Sacramento, California 95814Main website: [www.energy.ca.gov](http://www.energy.ca.gov)

In the matter of: ) Docket No. 12-OIR-04  
 )  
 Amendments to Energy Commission )  
 Conflict of Interest Regulations, California )  
 Code of Regulations, Title 20, Section 2402 )  
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California Energy Commission

**DOCKETED****12-OIR-04**

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**WRITTEN EXPLANATION OF REASONS  
 FOR AMENDMENTS TO THE ENERGY COMMISSION  
 CONFLICT OF INTEREST REGULATIONS**

In compliance with section 87306 of the Government Code, the Energy Commission has prepared this Explanation of the Reasons for the adopted amendments to section 2402, Title 20 of the California Code of Regulations.

**Overview**

The Political Reform Act of 1974 (Government Code section 87100 et seq.) requires that each State agency adopt a conflict of interest code applicable to certain employees of the agency. In addition, Government Code section 87306 mandates that each state agency amend its code as circumstances change, including the addition of positions which must be designated, and to submit a biennial report to the Fair Political Practices Commission identifying needed amendments to the code.

Accordingly, these amendments were adopted to reflect changes to the Energy Commission's organizational structure, classifications, and interests, including:

- Addition of new positions and newly-designated positions
- Deletion of positions
- Amendments to disclosure categories for certain positions
- Amendments to disclosure Category 6, related to utility business interests
- Nonsubstantive changes and corrections.

**Revisions to the Energy Commission Organization**

The Energy Commission has revised its organizational structure to create the Administrative and Financial Services Division. The amendments add the Administrative and Financial Services Division, the branches under that division, and designated positions that are required to report financial interests based upon job classification duties. Branches to be added to the code are: Training, Selection and Equal Employment Opportunity (EEO); Business Services; Budget (formerly Financial Services); Contracts; and Loans and Grants. Classifications to be designated positions under the Business Services Branch (formerly under the Human Resources and Support Services Branch) consist of Business Services Assistant and Business Services Officer (All levels). Unless otherwise specified below, these amendments do not affect the reporting interests of existing designated positions.

These amendments are necessary to accurately convey the names of divisions, branches, and associated classifications in the code.

### **Addition of Designated Positions Required to Report**

The Energy Commission has created new positions and some existing positions have absorbed duties from other designated positions. The amendments add 24 designated positions, based upon new positions and newly-designated positions where job duties currently include the making or participation in the making of decisions which may foreseeably have a material effect on any financial interest. The positions are described below under their respective divisions or offices.

#### **Office of Executive Director**

An amendment replaces the classification of “Energy Program Specialist III (Forecasting)” with “**Energy Commission Specialist III.**” The amendment encompasses similar positions under the same title. The designated positions are required to report pursuant to Category 1 (all sources of income). Employees in these positions are required to make or participate in the making of decisions which may foreseeably have a material effect on a wide variety of financial interests related to Energy Commission matters. Additionally, the amendment updates the existing title by replacing the word “Program” with “Commission.” The amendment is necessary to ensure accuracy of the Energy Commission’s designated positions in the code, to ensure appropriate reporting pursuant to disclosure categories, and to ensure consistency across classifications in the same division.

An amendment adds “**Staff Services Manager II**” as a designated position and requires disclosure under Categories 2 (contracts) and 7 (loans and grants). According to the current duty statement, the position is involved in the making or participation in the making of decisions which may foreseeably have a material effect on business entities that provide services, supplies, materials, machinery, or equipment of the type purchased, leased, or obtained by contract by the Energy Commission for use by the Energy Commission, its members, employees, or consultants. Additionally, the position makes or participates in the making of decisions which may foreseeably have a material effect on business entities of the type that have applied for or received any loan or grant from the Energy Commission. The amendment is necessary to ensure accuracy of the Energy Commission’s designated positions in the code and to ensure appropriate disclosure categories for financial interests.

An amendment adds “**Energy Commission Specialist I**” as a designated position and requires disclosure under Category 2 (contracts). According to the current duty statement, this position is involved in the making or participation in the making of decisions which may foreseeably have a material effect on business entities that provide services, supplies, materials, machinery, or equipment of the type purchased, leased, or obtained by contract by the Energy Commission for use by the Energy Commission, its members, employees, or consultants. The amendment is necessary to ensure accuracy of the Energy Commission’s designated positions in the code and to ensure appropriate disclosure categories for financial interests.

An amendment adds “**Staff Information Systems Analyst (Specialist)**” as a designated position and requires disclosure under Category 3 (computers/software). According to the current duty statement, the position is involved in the making or participation in the making of decisions which may foreseeably have a material effect on business entities that manufacture, sell, distribute, or otherwise provide computers, computer hardware, computer software, computer services, computer models, or computer-related supplies, materials, machinery, or equipment of the type utilized by the Energy Commission. The amendment is necessary to ensure accuracy of the Energy Commission’s

designated positions in the code and to ensure appropriate disclosure categories for financial interests.

#### Office of the Public Adviser

An amendment adds **Planner II** as a designated position and requires disclosure under Categories 5 (utilities) and 6 (utility equipment). According to the current duty statement, the position is involved in the making or participation in the making of decisions which may foreseeably have a material effect on business entities that engage in the design, development, construction, sale, or the acquisition of facilities that generate electricity. Additionally, the position is involved in the making or participation in the making of decisions which may foreseeably have a material effect on business entities that are energy or environmental consultants, research firms, or engineering firms, or business entities that design, build, manufacture, sell, distribute, or service equipment of the type that is utilized by any energy-producing entity that is a party to an Energy Commission proceeding. The amendment is necessary to ensure accuracy of the Energy Commission's designated positions in the code and to ensure appropriate disclosure categories for financial interests.

#### Administrative and Financial Management Services Division

An amendment adds **Deputy Director** as a designated position and requires disclosure under Category 1 (all sources of income). This executive position is involved in the making or participation in the making of decisions which may foreseeably have a material effect on a wide variety of financial interests related to Energy Commission matters. The amendment is necessary to ensure accuracy of the Energy Commission's designated positions in the code and to ensure appropriate disclosure categories for financial interests.

#### Training, Selection, and EEO Branch

An amendment adds **Staff Services Manager II** as a designated position and requires disclosure under Category 2 (contracts). According to the current duty statement, the position is involved in the making or participation in the making of decisions which may foreseeably have a material effect on business entities that provide services, supplies, materials, machinery, or equipment of the type purchased, leased, or obtained by contract by the Energy Commission for use by the Energy Commission, its members, employees, or consultants. The amendment is necessary to ensure accuracy of the Energy Commission's designated positions in the code and to ensure appropriate disclosure categories for financial interests.

#### Information Technology Services Branch

An amendment adds **Senior Programmer Analyst** as a designated position and requires disclosure under Category 3 (computers/software). According to the current duty statement, the position is involved in the making or participation in the making of decisions which may foreseeably have a material effect on business entities that manufacture, sell, distribute, or otherwise provide computers, computer hardware, computer software, computer services, computer models, or computer-related supplies, materials, machinery, or equipment of the type utilized by the Energy Commission. The amendment is necessary to ensure accuracy of the Energy Commission's designated positions in the code and to ensure appropriate disclosure categories for financial interests.

### Budget Branch

An amendment replaces the classification of Staff Services Manager III with **Staff Services Manager II**. The position of Staff Services Manager III no longer exists in this branch. The former and the proposed classifications are required to disclose under Category 1 (all sources of income). The position is involved in the making or participation in the making of decisions which may foreseeably have a material effect on a wide variety of financial interests related to Energy Commission matters. The amendment is necessary to ensure accuracy of the Energy Commission's designated positions in the code and to ensure appropriate disclosure categories for financial interests.

### Contracts Branch

An amendment adds **Staff Services Manager II** as a designated position and requires disclosure under Categories 2 (contracts) and 7 (loans and grants). According to the current duty statement, the position is involved in the making or participation in the making of decisions which may foreseeably have a material effect on business entities that provide services, supplies, materials, machinery, or equipment of the type purchased, leased, or obtained by contract by the Energy Commission for use by the Energy Commission, its members, employees, or consultants. Additionally, the position is involved in the making or participation in the making of decisions which may foreseeably have a material effect on business entities of the type that have applied for or received any loan or grant from the Energy Commission. The amendment is necessary to ensure accuracy of the Energy Commission's designated positions in the code and to ensure appropriate disclosure categories for financial interests.

An amendment adds **Associate Governmental Program Analyst** as a designated position and requires disclosure under Categories 2 (contracts) and 7 (loans and grants). According to the current duty statement, the position is involved in the making or participation in the making of decisions which may foreseeably have a material effect on business entities that provide services, supplies, materials, machinery, or equipment of the type purchased, leased, or obtained by contract by the Energy Commission for use by the Energy Commission, its members, employees, or consultants. Additionally, because the position may also work on loans and grants, the position is involved in the making or participation in the making of decisions which may foreseeably have a material effect on business entities of the type that have applied for or received any loan or grant from the Energy Commission. The amendment is necessary to ensure accuracy of the Energy Commission's designated positions in the code and to ensure appropriate disclosure categories for financial interests.

An amendment adds **Staff Services Analyst** as a designated position and requires disclosure under Categories 2 (contracts) and 7 (loans and grants). According to the current duty statement, the position is involved in the making or participation in the making of decisions which may foreseeably have a material effect on business entities that provide services, supplies, materials, machinery, or equipment of the type purchased, leased, or obtained by contract by the Energy Commission for use by the Energy Commission, its members, employees, or consultants. Additionally, because the position may also work on loans or grants, the position is involved in the making or participation in the making of decisions which may foreseeably have a material effect on business entities of the type that have applied for or received any loan or grant from the Energy Commission. The amendment is necessary to ensure accuracy of the Energy Commission's designated positions in the code and to ensure appropriate disclosure categories for financial interests.

## Grants & Loans Branch

An amendment adds **Staff Services Manager I** as a designated position and requires disclosure under Categories 2 (contracts) and 7 (loans and grants). According to the current duty statement, the position is involved in the making or participation in the making of decisions which may foreseeably have a material effect on business entities of the type that have applied for or received any loan or grant from the Energy Commission. Additionally, because the position may also work on contracts, the position is involved in the making or participation in the making of decisions which may foreseeably have a material effect on business entities that provide services, supplies, materials, machinery, or equipment of the type purchased, leased, or obtained by contract by the Energy Commission for use by the Energy Commission, its members, employees, or consultants. The amendment is necessary to ensure accuracy of the Energy Commission's designated positions in the code and to ensure appropriate disclosure categories for financial interests.

An amendment adds **Associate Governmental Program Analyst** as a designated position and requires disclosure under Categories 7 (loans and grants) and 2 (contracts). According to the current duty statement, the position is involved in the making or participation in the making of decisions which may foreseeably have a material effect on business entities of the type that have applied for or received any loan or grant from the Energy Commission. Additionally, because the position may also work on contracts, the position is involved in the making or participation in the making of decisions which may foreseeably have a material effect on business entities that provide services, supplies, materials, machinery, or equipment of the type purchased, leased, or obtained by contract by the Energy Commission for use by the Energy Commission, its members, employees, or consultants. The amendment is necessary to ensure accuracy of the Energy Commission's designated positions in the code and to ensure appropriate disclosure categories for financial interests.

An amendment adds **Staff Services Analyst** as a designated position and requires disclosure under Categories 7 (loans and grants) and 2 (contracts). According to the current duty statement, the position is involved in the making or participation in the making of decisions which may foreseeably have a material effect on business entities of the type that have applied for or received any loan or grant from the Energy Commission. Additionally, because the position may also work on contracts, the position is involved in the making or participation in the making of decisions which may foreseeably have a material effect on business entities that provide services, supplies, materials, machinery, or equipment of the type purchased, leased, or obtained by contract by the Energy Commission for use by the Energy Commission, its members, employees, or consultants. The amendment is necessary to ensure accuracy of the Energy Commission's designated positions in the code and to ensure appropriate disclosure categories for financial interests.

## Efficiency and Renewables Division

An amendment adds **Deputy Division Chief** as a designated position and requires disclosure under Category 1 (all sources of income). This executive position is involved in the making or participation in the making of decisions which may foreseeably have a material effect on a wide variety of financial interests related to Energy Commission matters. The amendment is necessary to ensure accuracy of the Energy Commission's designated positions in the code and to ensure appropriate disclosure categories for financial interests.

An amendment adds **Senior Electrical Engineer** as a designated position and requires disclosure under Categories 4 (appliance standards/efficiency) and 7 (loans and grants). Other current classifications of Electrical Engineer are required report the same interests. According to the current duty statement, the position is involved in the making or participation in the making of decisions

which may foreseeably have a material effect on business entities engaged in the design, manufacture, sale, distribution, assessment, calibration, evaluation, or testing of any appliance, equipment, product, program, service, or structure required to be approved by or to meet standards set by the Energy Commission. Additionally, the position is involved in the making or participation in the making of decisions which may foreseeably have a material effect on business entities of the type that have applied for or received any loan or grant from the Energy Commission. The amendment is necessary to ensure accuracy of the Energy Commission's designated positions in the code and to ensure appropriate disclosure categories for financial interests.

#### Siting, Transmission, and Environmental Protection Division

An amendment adds **Staff Services Manager II** as a designated position and requires disclosure under Category 2 (contracts). According to the current duty statement, the position is involved in the making or participation in the making of decisions which may foreseeably have a material effect on business entities that provide services, supplies, materials, machinery, or equipment of the type purchased, leased, or obtained by contract by the Energy Commission for use by the Energy Commission, its members, employees, or consultants. The amendment is necessary to ensure accuracy of the Energy Commission's designated positions in the code and to ensure appropriate disclosure categories for financial interests.

An amendment adds **Electrical Engineer** as a designated position and requires disclosure under Categories 5 (utilities), 6 (utility equipment), and 8 (commercial property). At this time, the Siting Division does not employ this classification, however, related duty statements for Associate Electrical Engineer and Senior Electrical Engineer require reporting under Categories 5, 6, and 8. Thus the position when filled would be involved in the making or participation in the making of decisions foreseeably having a material effect on business entities that engage in the design, development, construction, sale, or the acquisition of facilities that generate electricity. Additionally, the position would be involved in the making or participation in the making of decisions which may foreseeably have a material effect on business entities that are energy or environmental consultants, research firms, or engineering firms, or business entities that design, build, manufacture, sell, distribute, or service equipment of the type that is utilized by any energy-producing entity that is a party to an Energy Commission proceeding. The position would also be involved in the making or participation in the making of decisions which may foreseeably have a material effect on interests in real property located within the state of California and zoned or used primarily for industrial or commercial purposes. The amendment is necessary to ensure accuracy of the Energy Commission's designated positions in the code and to ensure appropriate disclosure categories for financial interests.

An amendment adds **Associate Civil Engineer** as a designated position and requires disclosure under Categories 5 (utilities), 6 (utility equipment), and 8 (industrial/commercial property). According to the current duty statement, the position is involved in the making or participation in the making of decisions which may foreseeably have a material effect on business entities that engage in the design, development, construction, sale, or the acquisition of facilities that generate electricity. Additionally, the position is involved in the making or participation in the making of decisions which may foreseeably have a material effect on business entities that are energy or environmental consultants, research firms, or engineering firms, or business entities that design, build, manufacture, sell, distribute, or service equipment of the type that is utilized by any energy-producing entity that is a party to an Energy Commission proceeding. The position is also involved in the making or participation in the making of decisions which may foreseeably have a material effect on interests in real property located within the state of California and zoned or used primarily for industrial or commercial purposes. The amendment is necessary to ensure accuracy of the Energy Commission's designated positions in the code and to ensure appropriate disclosure categories for financial interests.

### Research and Development Division

An amendment adds **Electrical Engineer** as a designated position and requires disclosure under Categories 5 (utilities), 6 (utility equipment), and 7 (loans and grants). At this time, the Research and Development Division does not employ this classification, however, related duty statements for Associate Electrical Engineer and Senior Electrical Engineer require reporting under Categories 5, 6, and 7. Thus the position when filled would be involved in the making or participation in the making of decisions which may foreseeably have a material effect on business entities that engage in the design, development, construction, sale, or the acquisition of facilities that generate electricity. Additionally, the position would be involved in the making or participation in the making of decisions which may foreseeably have a material effect on business entities that are energy or environmental consultants, research firms, or engineering firms, or business entities that design, build, manufacture, sell, distribute, or service equipment of the type that is utilized by any energy-producing entity that is a party to an Energy Commission proceeding. The position would also be involved in the making or participation in the making of decisions which may foreseeably have a material effect on business entities of the type that have applied for or received any loan or grant from the Energy Commission. The amendment is necessary to ensure accuracy of the Energy Commission's designated positions in the code and to ensure appropriate disclosure categories for financial interests.

### Fuels and Transportation Division

An amendment adds **Deputy Division Chief** as a designated position and requires disclosure under Category 1 (all sources of income). The executive position is involved in the making or participation in the making of decisions which may foreseeably have a material effect on a wide variety of financial interests related to Energy Commission matters. The amendment is necessary to ensure accuracy of the Energy Commission's designated positions in the code and to ensure appropriate disclosure categories for financial interests.

An amendment adds **Senior Electrical Engineer** as a designated position and requires disclosure under Categories 6 (utility equipment) and 7 (loans and grants). According to the current duty statement, the position is involved in the making or participation in the making of decisions which may foreseeably have a material effect on business entities that are energy or environmental consultants, research firms, or engineering firms, or business entities that design, build, manufacture, sell, distribute, or service equipment of the type that is utilized by any energy-producing entity that is a party to an Energy Commission proceeding. Additionally, the position is involved in the making or participation in the making of decisions which may foreseeably have a material effect on business entities of the type that have applied for or received any loan or grant from the Energy Commission. The amendment is necessary to ensure accuracy of the Energy Commission's designated positions in the code and to ensure appropriate disclosure categories for financial interests.

### Electricity Supply Analysis Division

An amendment adds **Electric Transmission Program Specialist** as a designated position and requires disclosure under Categories 5 (utilities) and 6 (utility equipment). According to the current duty statement, the position is involved in the making or participation in the making of decisions which may foreseeably have a material effect on business entities that engage in the design, development, construction, sale, or the acquisition of facilities that generate electricity. Additionally, the position is involved in the making or participation in the making of decisions which may foreseeably have a material effect on business entities that are energy or environmental consultants,

research firms, or engineering firms, or business entities that design, build, manufacture, sell, distribute, or service equipment of the type that is utilized by any energy-producing entity that is a party to an Energy Commission proceeding. The amendment is necessary to ensure accuracy of the Energy Commission's designated positions in the code and to ensure appropriate disclosure categories for financial interests.

### **Deletion of Designated Positions**

Amendments delete the following positions: Committee Liaison, Commissioners' Offices; Staff Services Manager III (under the former Human Resources and Support Services Branch) and Staff Services Manager III (Budget Branch), Administrative and Financial Management Services Division; Staff Information Systems Analyst (Specialist) in the Efficiency and Renewables Division; and Associate Information Systems Analyst (Specialist) in the Siting, Transmission, and Environmental Protection Division.

These positions no longer exist at the Energy Commission or their duties related to designated interests have been absorbed into a different job classification. The amendments are necessary to ensure accuracy of the Energy Commission's designated positions in the code.

### **Addition of Designations of Interests for Certain Positions**

Category 2 (contracts) is added to the following classifications: **Associate Energy Commission Specialist** and **Energy Commission Specialist I, II** in the Efficiency and Renewables Division. According to the current duty statements, the positions are involved in the making or participation in the making of decisions which may foreseeably have a material effect on business entities that provide services, supplies, materials, machinery, or equipment of the type purchased, leased, or obtained by contract by the Energy Commission for use by the Energy Commission, its members, employees, or consultants. The amendment is necessary to ensure accuracy of the Energy Commission's designated positions in the code and to ensure appropriate disclosure categories for financial interests.

Category 4 (appliance standards/efficiency) is added to the following classifications: **Hearing Adviser I, II** Office of Hearing Advisors; **Energy Commission Supervisor II, Associate Energy Commission Specialist, Energy Commission Specialist I, II, and III, and Associate Mechanical Engineer**, Efficiency and Renewables Division. Due to increased enforcement of Energy Commission efficiency standards and more frequent complaints that often result in a hearing or other proceeding, these positions are involved in the making or participation in the making of decisions which may foreseeably have a material effect on business entities engaged in the design, manufacture, sale, distribution, assessment, calibration, evaluation, or testing of any appliance, equipment, product, program, service, or structure required to be approved by or to meet standards set by the Energy Commission. At this time, the Office of Hearing Advisors does not employ the classification of Hearing Officer I, however, when filled, the classification is required to report the same interests as Hearing Officer II. The amendment is necessary to ensure accuracy of the Energy Commission's designated positions in the code and to ensure appropriate disclosure categories for financial interests.

### **Deletions of Designations of Interests for Certain Positions**

Category 3 (computers/software) is deleted from the following classifications: **Office Manager**, Fuels and Transportation Division; and **Office Manager**, Electricity Supply Analysis Division. According to current duty statements, the positions are no longer involved in the making or participation in the making of decisions which may foreseeably have a material effect on business entities that manufacture, sell, distribute, or otherwise provide computers, computer hardware, computer

software, computer services, computer models, or computer-related supplies, materials, machinery, or equipment of the type utilized by the Energy Commission. These duties have largely been absorbed into the Information Technology Services Branch of the Administrative and Financial Services Division. These amendments are necessary to narrowly tailor the designated interests to the current duties of the positions.

Category 9 (document production) is deleted from the following classifications: **Office Manager**, Efficiency and Renewables; **Energy Commission Supervisor II**, **Energy Commission Specialist II and III**, Research and Development. According to current duty statements, the positions are not involved in the making or participation in the making of decisions which may foreseeably have a material effect on business entities of the type that have contracted with the Energy Commission to provide services related to the design, editing, production, drafting, artwork, printing, publication, or distribution of an Energy Commission document. These duties have largely been supplanted by the electronic production of documents. These amendments are necessary to narrowly tailor the designated interests to the current duties of the positions.

### **Change in Disclosure Categories**

Amendments to Category 6 were adopted as follows:

Designated positions assigned to this category must report all sources of income, including gifts, loans, and travel payments, from, and investments and business positions in, business entities that are energy or environmental consultants, research firms, or engineering firms, or business entities that design, build, manufacture, sell, distribute, or service equipment of the type that is utilized by electric power suppliers, including, but not limited to, wind, solar, geothermal, hydroelectric, ocean, garbage, and biomass, or any energy-producing entity that is a party to—a an Energy Commission proceeding.

The addition of “or business” clarifies that the only applicable entities are business entities, and clarifies that the list of entities in that clause are separate from the previous list of entities. This amendment is necessary to remove a potential ambiguity and to aid clarity.

The addition of “energy-producing” to “entity” clarifies that the disclosure category applies to Energy Commission proceedings related to energy production, and not to every proceeding at the Energy Commission. This amendment is necessary to remove a potential ambiguity and to aid clarity.

The remaining edits are a nonsubstantive correction of typographical or grammatical errors.

### **Nonsubstantive Changes**

- 1) The following positions are consolidated where each level of the same classification is required to report the same interests. These amendments are necessary to aid clarity.

#### **Administrative and Financial Services Division**

Consultants for each branch are consolidated under the division title.

#### **Efficiency and Renewables Division**

Senior Electrical Engineer, Electrical Engineer, and Associate Electrical Engineer are consolidated to "Electrical Engineer (All levels)." The addition of Senior Electrical Engineer is explained above in Addition of Designated Positions Required to Report.

#### Siting, Transmission, and Environmental Protection Division

Senior Electrical Engineer, Electrical Engineer, and Associate Electrical Engineer are consolidated to "Electrical Engineer (All levels)." The addition of Electrical Engineer is explained above in Addition of Designated Positions Required to Report.

Mechanical Engineer, Senior Mechanical Engineer, and Associate Mechanical Engineer are consolidated to "Mechanical Engineer (All levels)."

Supervising Engineering Geologist, Senior Engineering Geologist, and Engineering Geologist are consolidated to "Engineering Geologist (All levels)."

#### Research and Development Division

Senior Electrical Engineer, Electrical Engineer, and Associate Electrical Engineer are consolidated to "Electrical Engineer (All levels)." The addition of Electrical Engineer is explained above in Addition of Designated Positions Required to Report.

Mechanical Engineer, Senior Mechanical Engineer, and Associate Mechanical Engineer are consolidated to "Mechanical Engineer (All levels)."

#### Fuels and Transportation Division

Mechanical Engineer, Senior Mechanical Engineer, and Associate Mechanical Engineer are consolidated to "Mechanical Engineer (All levels)."

#### Electricity Supply Analysis Division

Senior Electrical Engineer, Electrical Engineer, and Associate Electrical Engineer are consolidated to "Electrical Engineer (All levels)."

Mechanical Engineer, Senior Mechanical Engineer, and Associate Mechanical Engineer are consolidated to "Mechanical Engineer (All levels)."

- 2) An amendment breaks out the position of Energy Commission Specialist III in the Efficiency and Renewables Division, and then updates the classification "Energy Commission Specialist (All levels)" to "Energy Commission Specialist I and II." As explained above in Addition of Designations of Interests for Certain Positions, Level III requires different reporting interests than Levels I and II. This amendment is necessary to ensure appropriate disclosure by the designated interests.
- 3) Amendments delete the specification of CEA level from the following classifications: Chief Counsel, Office of the Chief Counsel; and the Deputy Directors, respectively, of the Efficiency and Renewables Division; the Siting, Transmission, and Environmental Protection Division; the Research and Development Division; the Fuels and Transportation Division; and the Electricity Supply Analysis Division.

Specifying CEA levels in each classification is not relevant to the disclosure of financial interests. Each of these executive positions must disclose pursuant to Category 1.

- 4) Amendments update the title of “Staff Counsel” (All levels), Chief Counsel’s Office, with the title of “Attorney” (All levels). The amendments are necessary to ensure accuracy of Energy Commission titles in the code.
- 5) Amendments to the “Category 6” designated interest correct typographical/ grammatical errors. The amendments are necessary to ensure accuracy and to aid clarity.
- 6) An amendment corrects “designed” to “designated” in the text regarding consultants. The amendment is necessary to ensure accuracy and to aid clarity.