

## **Title: Lobbying Contacts**

Document Type: Company Policy

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President: *Quiniones, Gil*  
President & CEO

Executive Owner: Driscoll, Justin  
EVP & General Counsel

Content Owner: Delince, Karen  
VP & Corporate Secretary

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## Lobbying Contacts

Note: Revision # should be listed in descending order starting with most recent version at the top.

Revision Date(For IBC Use Only)	Revision #	Description/Modification	Revision Section (s)	Author
9/25/2021	3	Bi-Annual Review		Karen Delince VP & Corporate Secretary
4/6/2021	2	Correction to the word Lobbying	1	Karen Delince VP & Corporate Secretary
1/30/2019	1	Updated to e-Scribe template  Updated revision cycle to every other year  Added Attachment	8  9	Karen Delince VP & Corporate Secretary

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## **1 PURPOSE AND SCOPE**

In furtherance of the Authority's commitment to ensure transparency and accountability of its operations, this Policy sets forth the Authority's program for recording lobbying contacts in compliance with the requirements of the New York Public Authorities Law.

This Policy establishes measures to create and maintain records of any attempt by a lobbyist to influence: (a) the adoption or rejection of any rule or regulation by the Authority, and/or (b) the outcome of any ratemaking proceeding by the Authority.

## **2 APPLICABILITY**

This Policy shall be adhered to by all employees, officers and trustees of the Authority. Implementing procedures shall be prepared as necessary to provide appropriate guidance in meeting the management controls described.

## **3 INITIALISMS (ACRONYMS) AND DEFINITIONS**

Contact - any conversation, in person or by telephonic or other remote means, or correspondence between any lobbyist engaged in the act of lobbying and any employee, officer or trustee within the Authority who can make or influence a decision on the subject of the lobbying on behalf of the Authority.

Lobbying - any attempt to influence: (a) the adoption or rejection of any rule or regulation by the Authority, and/or (b) the outcome of any ratemaking proceeding by the Authority.

Lobbyist - every person or organization retained, employed or designated by any client to engage in lobbying. Lobbyist does not include any officer, director, trustee, employee, counsel or agent of the state, or of any municipality or subdivision of New York State, when such persons are discharging their official duties. However, officers, directors, trustees, employees, counsels, or agents of colleges as defined by New York Education Law § 2(2) are considered lobbyists for purposes of PAL § 2987.

## **4 RESPONSIBILITY**

4.1 The Corporate Secretary shall prescribe the form Record of Lobbying Contact (See Attachment 1) to be used by all employees, officers and trustees to record lobbying contacts pursuant to PAL § 2987.

4.2 An employee, officer or trustee who is contacted by a lobbyist shall make a contemporaneous record of such contact on the form prescribed by the Corporate Secretary, including the day and time of the contact, the identity of the lobbyist and a summary of the substance of the contact. The employee, officer or trustee shall notify and deliver the completed form to the Corporate Secretary.

4.3 Upon receipt of a record of contact, the Corporate Secretary shall maintain or cause to be maintained such record for a period of not less than seven (7) years in a filing system that is indexed or otherwise organized in a manner in which such records are readily identifiable and referenced to Authority decisions regarding (a) the adoption or rejection of any rule or regulation by the Authority and (b) the outcome of any ratemaking proceeding by the Authority.

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**5 POLICY IMPLEMENTATION****5.0 MANAGEMENT CONTROLS****5.1 General**

5.11 This Policy implements the requirements of Public Authorities Law (“PAL”) § 2987. The Authority has established this Policy to ensure a record is made and maintained by the Authority of any and all communication between a lobbyist engaged in lobbying and employees, officers or trustees who can make or influence a decision on behalf of the Authority regarding: (a) the adoption or rejection of any rule or regulation by the Authority, or (b) the outcome of any ratemaking proceeding by the Authority.

5.12 The Corporate Secretary is designated as the officer to whom all records of lobbying contacts shall be delivered and maintained. A contemporaneous record of the contact shall be recorded on a form prescribed by the Corporate Secretary.

**6 VIOLATIONS**

Violations of this Policy and related policies and procedures by employees may result in disciplinary action up to and including termination. In addition, where the conduct engaged in is illegal, violators may be subject to prosecution under applicable federal, state or local laws.

**7 REFERENCES**

- 7.1 New York Public Authorities Law § 2987
- 7.2 New York Education Law § 2(2)

**8 POLICY REVIEW AND EXPIRATION**

This document will be reviewed and updated as business needs require. However, a mandatory review will be required on the anniversary date of the approved document.

**Revision cycle: Every Other Year**

**9 ATTACHMENTS**

Attachment 1 – Record of Lobbying Contact

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**RECORD OF LOBBYING CONTACT**  
**(Pursuant to Public Authorities Law §2987)**

**Date:** \_\_\_\_\_

**From:** \_\_\_\_\_ **Title:** \_\_\_\_\_

**E-mail Address:** \_\_\_\_\_

**Subject: Record of Lobbying Contact**

Select One:  Rule/Regulation  Rate Making

**I was contacted by the below-named individual or organization regarding the identified lobbying matter. It appears to me that this contact was an attempt to influence (1) the adoption or rejection of a rule or regulation, or (2) ratemaking proceeding, as defined in New York Public Authorities Law §2987.**

**Date of contact (MM/DD/YYYY):** \_\_\_\_\_ **Time of contact (HH:MM AM/PM):** \_\_\_\_\_

**The contact took the form of:** (Please select one)

Correspondence  In-person  Telephon  E-mail  Other

**Subject Matter:**

**Summary of contact: (if contacted by correspondence or e-mail, please attach a copy)**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**LOBBYIST INFORMATION**

**Name:** \_\_\_\_\_

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**Address:** \_\_\_\_\_

**City:** \_\_\_\_\_ **State:** \_\_\_\_\_ **Zip Code:** \_\_\_\_\_

**Telephone (###-###-####):** \_\_\_\_\_ **E-mail  
Address:** \_\_\_\_\_

**Place of principal  
employment:** \_\_\_\_\_

**Occupation:** \_\_\_\_\_

**Person/Organization on whose behalf contact was  
made:** \_\_\_\_\_

Email completed form (with attachments, if any) to Corporate Secretary at  
[Secretarys.Office@nypa.gov](mailto:Secretarys.Office@nypa.gov).

## **E-Signature Approval History**

<b>Role</b>	<b>Name</b>	<b>Approved Date</b>
President	Quiniones, Gil	9/25/2021
EVP Chief HR and Administrative Officer	Pizzo, Kristine	9/20/2021
General Counsel	Driscoll, Justin	9/20/2021
Chief Operation Officer	Kessler, Joseph	9/13/2021
Executive Owner	Driscoll, Justin	9/13/2021
Content Owner	Delince, Karen	9/7/2021

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