
CITY OF ANAHEIM PUBLIC UTILITIES DEPARTMENT ORDER**500 – INTERNAL COMPLIANCE PLAN**

I. BACKGROUND

This Department Order (DO) 500 establishes the Public Utilities Department (Department) policies and procedures for fulfilling the requirements listed in the Department's Internal Compliance Plan (ICP).

The policy of the Department is to fully comply with all regulatory requirements. The ICP identifies numerous laws and regulations that apply to the Department in some manner. ICP status and milestones are tracked by the Environmental Services group under the direction of the Chief Risk Officer; however, compliance activities are implemented by the responsible operating division. Periodic updates will be made to DO 500 to include new laws and regulations that are tracked in the ICP.

II. APPLICABLE REGULATIONS

DO 500 identifies responsibilities required of Department personnel under regulations implemented by federal, state and other regulatory agencies, commissions, and other organizations, including:

<u>Organization / Agency</u>	<u>Acronym</u>	<u>Area of Influence</u>
Anaheim Fire Department	AFD	Hazardous materials
Army Corps of Engineers	ACOE	Wetlands
California Air Resources Control Board	CARB	Air quality statewide
California Department of Fish and Wildlife	F&W	Wildlife and wetlands
California Department of Public Health	DPH	Drinking water
California Department of Toxic Substances Control	DTSC	Hazardous materials
California Department of Water Resources	DWR	Water resources
California Emergency Management Agency	EMA	Emergencies / Spill Reporting
California Energy Commission	CEC	Electric energy
California Environmental Protection Agency	Cal EPA	Environment
California Independent System Operator	CAISO	Electric Operations
California Occupational Safety and Health Admin.	Cal OSHA	Worker safety
California Regional Water Quality Control Board	RWQCB	Water quality
California State Water Resources Control Board	SWRCB	Water resources
Federal Energy Regulatory Commission	FERC	Electric energy
Governor's Office of Planning and Research	OPR	Calif. Env. Quality Act (CEQA)
North American Electric Reliability Corporation	NERC	Electric reliability
Orange County Public Works	OCPW	Flood channels
Orange County Sanitation District	OCSO	Sewer systems
South Coast Air Quality Management District	SCAQMD	Air quality – regional
United States Environmental Protection Agency	US EPA	Environment
United States Fish and Wildlife Service	FWS	Endangered species
Western Electric Coordinating Council	WECC	Electric transmission

III. STEP-BY-STEP PROCEDURE

A. Roles and Responsibilities

1. Chief Risk Officer responsibilities
 - a. Provide management for the Department's regulatory compliance programs, and recommend strategic initiatives to improve the ICP.
 - b. Ensure that the ICP is updated at least quarterly and prepare a quarterly compliance report for the General Manager for the purpose of disseminating information to the Public Utilities Board.
 - c. Consult with the City Attorney's office when necessary to clarify/determine legal requirements and/or to negotiate settlement with regulatory agencies if necessary.
 - d. Approve the ICP.
2. Assistant General Managers'/Division Managers' responsibilities
 - a. Ensure compliance with Department regulatory compliance policies and procedures.
 - b. Review quarterly reports and identify areas for improvement or other compliance strategies as needed.
3. Environmental Services Manager responsibilities
 - a. Develop, administer, and maintain reporting requirements to ensure the Department's regulatory compliance.
 - b. Develop and maintain the ICP to summarize environmental, energy, and other regulatory issues important to the Department. The ICP identifies important laws and regulations and shall include the general regulatory concern, the regulatory agency involved, the affected Divisions, the Department's compliance strategies, the specific reports submitted and other requirements, and the staff person(s) responsible for compliance.
 - c. Consult with the City Attorney's Office when necessary to clarify/determine legal requirements and to negotiate settlements with regulatory agencies if necessary.
 - d. Ensure that the ICP is updated at least quarterly and assist the Chief Risk Officer in preparing a quarterly compliance report for the General Manager.
 - e. Review new legislation and regulations and recommend compliance strategies as appropriate.
 - f. Prepare various reports regarding the status of Department compliance efforts.
 - g. If violations are issued to the Department or other enforcement actions are issued or pursued by regulatory agencies, work with Division management in resolving the issue and coordinating settlements with the City Attorney's Office.
 - h. Provide electronic or hard copies of regulatory compliance documentation to the Records & Information Manager for records retention.
4. All Department employees' responsibilities
 - a. All Department employees who have any involvement with regulated activities shall follow Department policies and procedures for ensuring continuous compliance.
 - b. Employees listed on the ICP as having specific compliance responsibilities shall complete those responsibilities as required. An update of compliance actions shall be provided to the Environmental Services Manager quarterly or upon request.
 - c. Inform the Environmental Services Manager of new, or previously unaccounted for regulations that impact Department operations and assist in developing compliance strategies.
 - d. Ensure that documentation of ICP listed regulatory compliance actions is available to the Environmental Services Manager either via hard copy or electronically.
 - e. Provide documentation of notices of violation or other regulatory agency directives to the Environmental Services Manager either via hard copy or electronically.

- f. When regulatory matters arise and a Department employee is unsure of the proper procedures or protocols, he/she shall ask the responsible supervisor or manager for direction. A member of the Energy Risk & Compliance Division may be consulted, if appropriate.

IV. DEPARTMENT ORDER RESPONSIBILITIES

- A. Administrative Control (Implementation, Interpretation) – Chief Risk Officer**
- B. Communication and Training – Environmental Services Manager**
- C. Updating – Environmental Services Manager**

V. ATTACHMENTS

- A. Internal Compliance Plan**

Submitted:



Dukku Lee
Public Utilities General Manager

11/15/2017
Date

Approved by the Public Utilities Board on

11/15/2017
Date