

NOTICE OF BOARD MEETING

The regular meeting of the Board of Directors of the Delaware County Electric Cooperative, Inc. will be held **Tuesday, August 23, 2022, at 5:00 pm**
Location is room 109 at the Co-op's office, 5 North Depot Street, Delhi, New York to act on the following agenda.

AGENDA

- I. Opening Business:
 - a. Call to Order
 - b. Roll Call - Determination of Quorum
 - c. Adoption of Agenda

[packet page 1]
- II. Executive Session
- III. Consent Agenda:
 - a. Minutes of July 26, 2022 Regular Meeting
 - b. New Memberships
 - c. Bad Debt Collection Report & Resolution
 - d. Director Compensation
 - e. Corporate Calendar

[packet pages 2-4]
[packet page 5]
[hand out]
[individual 6-7]
[packet page 8]
- IV. Review of Policies:
 - a. Organization & Staffing Committee
 - b. Cyber Security

[packet pages 9-12]
[packet pages 13-24]
- V. Discussion of Policies:
 - a. Records Management, Retention, and Public Access
 - b. Line Extensions for New Services

[packet pages 25-54 / presentation by CEO Evans/ CFO Cannizzaro]
[handout and presentation by Operations Manager Sullivan]
- VI. COVID Update

[packet pages 55-66]
- VII. CEO/ General Manager's Report:

[packet pages 67-69]
- VIII. CFO's Monthly Report:
 - a. Monthly Financials (August 2022)

[hand out/ presentation by CFO Cannizzaro]
- IX. Operations Manager's Monthly Report:
 - a. Quarterly Line Department Report

[presentation by Operations Manager Sullivan]
- X. 2022 Annual Meeting of Members:
 - a.
- XI. Director/Staff Association Reports:
 - a. NYSRECA
 - b. NYAPP

[report from attendees]
[report from attendees]
- XII. New Business:
- XIII. Future Business:
 - a. DCEC Annual Meeting 09/09/22 5:30pm @ Delaware Academy
 - b. NYSRECA Government Relations Committee 09/09/22 @ 1:30pm, virtual
 - c. NYAPP Monthly Meeting 09/16/22 @ 11am, virtual
 - d. DCEC Regular Board Meeting, Tuesday, 09/27/22 @ 5pm
 - i. Quarterly Tree Crew Update to Board/ 2023 Bids
 - ii. Line Extension Policy Discussions
 - e. Cost of Service Study (COSS) – Summer, Fall of 2022
 - f. NYAPP Quarterly 10/12/22 – 10/13/22, Corning
 - g. DCEC Finance Committee Meeting 11/01/22 @ 5pm
- XIV. Executive Session:
- XV. Adjournment:

The aim of Delaware County Electric Cooperative, Inc., is to make electric energy and related services available to members at the lowest cost consistent with sound economy and good management.

Cooperative Stakeholders

- Members
- Employees
- Community
- Business Partners
 - Suppliers
 - RUS
 - CFC
 - Federated
 - Other cooperatives
 - NYSERDA
- Government
- Regulators

**Delaware County Electric Cooperative
Board Meeting Minutes
26 July 2022**

I. Opening Business:

The regular monthly meeting of the Board of Directors of the Delaware County Electric Cooperative, Inc. was held July 26, 2022, at the Co-op's office, 5 North Depot Street, Delhi, New York.

A. Call to Order: The meeting was called to order at 5:05 p.m. by President Pick.

B. Roll Call - Determination of Quorum:

Edward Pick Jr.	P- Present
Jeffrey Russell	P- Present
Paul Menke	P- Present
Laurie Wehmeyer	P- Present
Stephen Oles	P- Present
Steve Burnett	P- Present
Kimberly Tosi	T- Present via Teams

Others Present:

Board Staff:

CEO Christopher Evans	P- Present
Attorney Jeff Clark	T- Present via Teams

DCEC Staff:

CFO Mark Cannizzaro	P- Present
Operations Manager Ryan Sullivan.	P- Present

C. Adoption of Agenda: A motion was made by Director Burnett to approve the agenda as amended. The motion was seconded by Vice President Russell. The motion passed. .

II. Consent Agenda:

A motion was made by Director Burnett to approve the Consent Agenda as amended. The motion was seconded by Vice President Russell. The motion passed

III. Resignation of CEO/GM Christopher Evans:

The resignation letter of CEO Evans was received with a last day worked to be no later than 20 September or as soon as 19 August as mutually agreed. Particulars and other matters to be discussed in Executive session later in the meeting.

IV. General Manager Report:

CEO Evans highlighted topics and fielded questions and comments regarding the report. There was discussion about staffing changes, Annual Meeting plans, website migration to new platform and a NYPA/EPRI heat pump pilot program. After lengthy discussion, the pilot program was declined

V. Monthly Financial Reports:

CFO Cannizzaro presented June 2022 monthly financial report. Discussion was had on sales, increases to amounts turned over to collections, A/R, Maintenance expense variances and A/G expense variation.

VI. Quarterly Fleet Department Report:

Operations Manager Sullivan presented a report stating a new truck had arrived and a pickup was still on order. Mr. Sullivan reported successful passing of dielectric tests. Direct Menke asked about age of fleet and disposition plans. Mr. Sullivan reported that we would hold on to units given present supply issue but the oldest pickup (12 years old) would most likely be auctioned as usual.

VI. Annual Meeting Update:

CEO Evans went over proposed agenda and some additional details.

VII. Director/Staff Association Reports by Attendees:

- A. UUS: CEO Evans gave the update from the UUS Annual Meeting and went over audit report, sales projections and other topics including land purchase in Pennsylvania and changes to how ERMCO distributes its capital credits and sells its transformers.
- B. NYSRECA: President Pick and CEO Evans reported on letter to NYSEG/PSC.
- C. NYAPP: President Pick and CEO Evans reported mid-term elections have cooled some of the movement at the Federal level whereas the state and PSC are continuing to pass service rules and regulations that may eventually impact us.

VIII. New Business:

As part of the HQ project, there was a matter of a lot line boundary adjustment constituting giving 980 square ft of land around a misplaced stone wall to Delhi Development. A motion was made by Director Burnett and Seconded by Treasurer Menke to Authorize adjustment to owned lands. The motion carried

IX. Future Business:

- A. Regular Board Meeting, Tuesday, 08/23/22 @ 5pm
 - a. Quarterly Line Department Update to Board
 - b. Line Extension Policy Discussions
 - c. Record Retention Policy Discussions
 - d. Organization & Staffing Committee Policy Discussions
- B. Cost of Service Study (COSS) – 08/31/22 target
- C. NRECA Region 1 / 4, 09/06/22-09/08/22, Indianapolis
- D. DCEC Annual Meeting 09/09/22, Delaware Academy
- E. Construction Work Plan/Long Range Plan (CWP/LRP) – 09/31/22 target

X. Executive Session #1:

A motion was made by Director Oles to enter Executive Session at 6:22 pm. The motion was seconded by Secretary Wehmeyer. The motion passed. CEO Evans was excused. At 7:06 pm, a motion was made by Treasurer Menke to come out of Executive Session. The motion was seconded by Vice President Russell. The motion passed.

XI Appointment of CEO Search Committee:

President Pick appointed himself, Vice President Russell and Secretary Wehmeyer to be the CEO Search Committee.

XII. Executive Session #2:

A motion was made by Director Oles to enter Executive Session at 7:08pm. The motion was seconded by Vice President Russell. The motion passed. CFO Cannizzaro and Operations Manager Sullivan were excused and CEO Evans was invited to enter. At 7:30 pm, CEO Evans was excused. At 8:20 pm, a motion was made by Vice President Russell to come out of Executive Session. The motion was seconded by Secretary Wehmeyer. The motion passed.

Adjournment:

President Pick adjourned the meeting at 8:22pm.

Respectfully submitted,

Laurie Wehmeyer
Secretary

Delaware County Electric Cooperative, Inc.

5 North Depot Street, P. O. Box 471, Delhi, New York 13753-0471

NEW MEMBERSHIPS – August 23, 2022

[illegible]

<u>DIV</u>	<u>ACTIVITY</u>	<u>A</u>	<u>S</u>	<u>O</u>	<u>N</u>	<u>D</u>	<u>J</u>	<u>F</u>	<u>M</u>	<u>A</u>	<u>M</u>	<u>J</u>	<u>J</u>	<u>PROCESS</u>
BOARD	Nominating (Director Search) Committee Meeting													MEETING
BOARD	Annual Meeting Kick-off Planning (incl consideration of Bylaw changes)													MEETING
BOARD	Legislative Youth Tour Interviews/Selection													MEETING
BOARD	Board decision/approval of proposed bylaw changes (for Annual Meeting)													ACTION
BOARD	NYSRECA Legislative Conference (tbd)													MEETING
BOARD	Finance Committee Meeting													MEETING
BOARD	Organization & Staffing Committee Meeting													MEETING
BOARD	NEAEC Annual Meeting													MEETING
BOARD	Board Self-Evaluation Survey (odd years only, next 2023)													COMPLY
BOARD	NYSRECA Annual Meeting													MEETING
BOARD	OEC Annual Meeting													MEETING
BOARD	CEO Goals & Objectives Mid-Year Review													REPORT
BOARD	NRECA Survey - Directors, Attorneys, Auditors													PROCESS
BOARD	Cooperative Officers Job Descriptions Review													COMPLY
BOARD	Organizational Meeting of Board (incl. Committee appointments)													COMPLY
BOARD	NRECA Region 1 Annual Meeting													MEETING
BOARD	Kick-off Budgeting Process (prelim capital budget)													BUDGET
BOARD	Annual Sexual Harassment Training													COMPLY
BOARD	Capital Credit retirement - decision by Board													ACTION
BOARD	Re-instatement of Accounting/Audit Firm (resolution)													AUDIT
BOARD	Oneida-Madison EC Annual Meeting													MEETING
BOARD	Steuben REC Annual Meeting													MEETING
BOARD	CEO Performance Review – kick off & plan Jan O&S Committee Mtg													PROCESS
BOARD	Approve Holiday Gift for Board/Staff/Employees													PROCESS
BOARD	NRECA Annual Meeting													MEETING
BOARD	Board appoints Nominating Committee (Directors identify members)													ACTION
BOARD	Consider GM contract renewal/update													PROCESS
MGMT	Line Extension Policy Rate Review													PROCESS
MGMT	DEC Pesticide Business/Agency Registration (April/May, tri-annual, next in 2022)													COMPLY
MGMT	Update Standard Costs													PROCESS
MGMT	NYS ORPS Equalization & Assessment report (4/15)													COMPLY
MGMT	Strategic Plan Review													COMPLY
MGMT	ROW & Line-Inspection contracting Bid													PROCESS
MGMT	Semi-annual review of Corporate Calendar													PROCESS
MGMT	Renew Purchase of TCCs with NYISO/NYPA													PROCESS
MGMT	CFC Annual Forum													MEETING
MGMT	ROW & Line-Inspection contracting Awards/ Contract Bid Report to Board for Budget													BUDGET
MGMT	Self-Eval to Board													REPORT
MGMT	DCEC Annual Meeting													MEETING
MGMT	Year-End Financial Projection (Capital Credit Retirement Assessment)													REPORT
MGMT	Review DPS Data for Annual Member Deposit Rate Effective 1/1													COMPLY
MGMT	All-Employee Meeting (last week October)													PROCESS
MGMT	Order Holiday Gift Cards for Board/Staff/Employees													PROCESS
MGMT	Year-end Financial Projection (Formulary Rate Planning)													BUDGET
MGMT	Operating Plan/Budget Presented													BUDGET
MGMT	Capital Credit Retirement (if applicable)													PROCESS
MGMT	Employee Performance Reviews – prep													STAFFING
MGMT	Operating Plan/Budget Approved													BUDGET
MGMT	Christmas Party													STAFFING
MGMT	Update PPAC “System Loss Factor” based on prior year analysis													PROCESS
MGMT	Exempt Employee Salary Action													PROCESS
MGMT	Employee Performance Reviews													REPORT
MGMT	NYSRECA Meeting													MEETING
MGMT	Year-End Accomplishments Review / Goals & Objectives Approval													REPORT

POLICY

SUBJECT: Organization and Staffing Committee

POLICY: It shall be the policy of the Board to create and maintain the Organization and Staffing Committee for the purpose of advising the Board with respect to:

- 1) Compensation and evaluation of the CEO/General Manager,
- 2) Overall goals and objectives of the Cooperative,
- 3) Senior management succession planning,
- 4) Employee compensation and benefits, including collective bargaining negotiations.

PROCEDURE:

I. Committee Structure and Procedures:

1. The Committee shall be comprised of three or more directors identified annually at the Board's re-organization meeting. The exact number is to be determined from time to time by resolution of the Board.
2. The Chairman of the Committee shall be designated by a majority vote of the Committee. The Chairman shall report to the Board on the deliberations, actions, and recommendations of the Committee. The Chairman shall be responsible for the orientation of new Committee members regarding organization and staffing matters.
3. The Committee shall be fully independent, accountable, and vigorous in taking primary responsibility for all aspects of Cooperative goals and objectives, executive compensation and review, succession planning, and employee benefits.
4. The Committee shall meet in person, at least twice annually, at such times and places determined by the Chairman of the Committee to discuss these matters.

5. The Committee shall meet in executive session without the presence of any members of management as often as it deems appropriate.
6. The Committee may request that any directors, officers, or employees of the Cooperative, or other persons whose advice and counsel are sought by the Committee, attend any meeting of the Committee to provide such pertinent information as the Committee requests.

II. CEO/General Manager Performance and Compensation:

It is recognized that effective executive leadership is essential to the success of the Cooperative. For this reason, the Committee shall:

1. Periodically review and make recommendations to the Board with respect to executive compensation and executive retirement plans and all other benefits.
2. Annually develop in cooperation with the CEO/General Manager and recommend for Board approval at the beginning of each year a set of performance goals and objectives with respect to the compensation of the CEO/General Manager.
3. Annually oversee a formal performance evaluation of the CEO/General Manager against Board-approved goals and objectives and the following leadership qualities, to provide feedback to the CEO/General Manager, while also identifying future development needs:
 - Leadership
 - Building Team Spirit
 - Managing Vision and Mission
 - Organizational Flexibility
 - Approachability and Accessibility
 - Effective Decision Making
 - Business Acumen
 - Accountability
 - Developing People
 - Integrity and Trust
 - Delivering on Commitments
 - Presentation Skills
 - Maintaining Organizational Values
 - Leading the safety culture
 - Community Involvement

– Member Relations

The following steps are utilized to carry out this evaluation:

- The CEO/General Manager provides a self-evaluation to the Board within seventy-five (75) days of the end of the fiscal year.
 - Directors from the entire Board provide their individual assessments of the CEO/General Manager's performance against the previously approved goals & objectives and leadership qualities. Directors should identify any future development needs they deem necessary for the CEO/General Manager.
 - The Organization and Staffing Committee reviews this information and recommends annual compensation and benefits of the CEO/General Manager based on the evaluation.
 - The Chair of the Organization and Staffing Committee meets with the CEO/General Manager to discuss the Board's assessment of performance and development needs for the CEO/General Manager. The CEO/General Manager may then take the opportunity to discuss his/her reaction to the evaluation.
4. Based on the evaluation, the Board sets the compensation and benefits of the CEO/General Manager.

III. Overall Goals and Objectives:

The Cooperative is managed to maximize the benefits of membership to all members, which incorporates fiscal responsibility, ethical business practices, and attention to membership value. For this reason, the Committee shall:

Consult with the CEO/General Manager and advise the Board with respect to goals and objectives that will continue to strengthen the Cooperative's ability to provide its members with valued service.

IV. Succession Planning:

It is recognized that formally anticipating the future management needs of the Cooperative is necessary to its long-term health and viability. For this reason, the Committee shall:

1. Consult with the CEO/General Manager and advise the Board with respect to senior management succession planning.
2. In situations where there is an anticipated or actual vacancy in the position of CEO/General Manager, advise the Board in identifying candidates for Board consideration based on prior experience and education, understanding of the Cooperative's business environment, leadership qualities, industry knowledge, expertise, reputation, integrity and other skills and attributes.

IV. Employee Benefits:

It is recognized that retaining a motivated and productive workforce allows the Cooperative to serve its members in the most effective manner. For this reason, The Committee shall:

1. Seek information from reputable sources with respect to the compensation and benefits of employees in similar positions and markets.
2. Consult with the CEO/General Manager and advise the Board with respect the compensation and benefits required to retain and motivate employees to their best effort.

RESPONSIBILITY: Board of Directors

DELAWARE COUNTY ELECTRIC COOPERATIVE, INC.

Approved by Board of Directors	Dec 23, 2008
Revised by Board of Directors	Sept 27, 2011
Revised by Board of Directors	Nov 25, 2014
Revised by Board of Directors	Aug 24, 2016
Reviewed by Board of Directors	Aug 27, 2019

POLICY

SUBJECT: Cyber Security

OVERVIEW & PURPOSE

Delaware County Electric Cooperative (DCEC) is committed to protecting DCEC employees, stakeholders and the company from illegal or damaging actions by individuals, either knowingly or unknowingly. Internet/Intranet/Extranet-related systems, including but not limited to computer equipment, software, operating systems, storage media, network accounts providing electronic mail, Internet Web browsing, and FTP, are the property of DCEC. These systems are to be used for business purposes in serving the interests of the company, and our customers in the course of normal operations. DCEC's intentions in publishing a Cyber Security Policy are not to impose restrictions that are contrary to DCEC's established culture of openness, trust and integrity.

Effective security is a team effort involving the participation and support of every DCEC employee and affiliate who deals with information and/or information systems. It is the responsibility of every computer user to know these guidelines, and to conduct their activities accordingly.

The purpose of this policy is to outline the acceptable use of computer equipment and Information Technology (IT) infrastructure at DCEC. These rules are in place to protect the employee's and DCEC. Inappropriate use exposes DCEC to risks including computer virus attacks, compromise of network systems and services, and legal issues. The policy balances the employee's ability to benefit fully from information technology with the company's need for secure and effectively allocated IT resources.

This policy applies to employees, contractors, consultants, temporaries and other workers at DCEC, including all personnel affiliated with third parties. This policy applies to all equipment, software and/or applications that are owned, licensed or leased by DCEC.

POLICY

A. General Use and Ownership

1. While DCEC's board of directors and managers desire to provide users with reasonable access to IT infrastructure to accommodate both the demands of the work environment and permitted personal use, users should be aware that data they create on the corporate systems remains the property of DCEC. Because of the need to monitor the internal network (Intranet) in order to protect DCEC's IT resources and information, management cannot guarantee the confidentiality of personal information stored on any network device belonging to DCEC or in files on the DCEC Intranet.

2. Employees are responsible for exercising good judgment regarding the reasonableness of personal use. DCEC owned IT equipment and computers and related services may be used for incidental personal use during break periods provided that:
 - Usage is reasonable and does not interfere with work productivity.
 - Does not directly or indirectly interfere with DCEC business operations, IT facilities or electronic mail services.
 - Does not burden DCEC with noticeable incremental cost.
 - If there is any uncertainty as to what constitutes acceptable personal use, employees should consult their supervisor or the General Manager who will make the determination.
3. Since Internet activities may be monitored, all personnel accessing the Internet shall have no expectation of privacy.

B. Security and Proprietary Information

1. Users may not encrypt any emails without obtaining written permission from their supervisor and DCEC's General Manager. If approved, the encryption key(S) must be made known to DCEC's General Manager.
2. Data residing on DCEC corporate IT systems may be classified as either confidential or not confidential, as defined by corporate confidentiality guidelines. Examples of confidential information include but are not limited to: company private, corporate strategies, competitor sensitive, trade secrets, specifications, and member lists. Employees should take all necessary steps to prevent unauthorized access to this information.
3. For security and network maintenance purposes, authorized individuals within DCEC may monitor equipment, systems and network traffic at any time, with prior authorization of the General Manager.
4. DCEC reserves the right to audit networks and systems on a periodic basis to ensure compliance with this policy.
5. Employees must use extreme caution when opening e-mail attachments received from unknown senders, which may contain viruses, e-mail bombs, or Trojan horse code. DCEC utilizes Anti-Virus software on each workstation and server as well as filtering all inbound email through an outside security firm, but some unsafe attachments may still find their way through the defenses. Users are expected to use reasonable caution in reviewing incoming emails, looking for any indication that the sender may differ than as represented. If there are ever any questions or if an individual is unsure, please contact the General Manager prior to opening the attachment.
6. Because information contained on approved portable and laptop computers is especially vulnerable, special care should be exercised to protect both the computer and its information.

7. Employees shall not use DCEC e-mail, or other facilities to post to news groups, message boards, or websites unless the posting is in the course of business duties.
8. The General Manager shall report any known breaches of cyber security to the Board of Directors as soon as practical after discovery, no later than the next regular meeting of the Board of Directors. If no known breaches of cyber security become known to the General Manager within a calendar year, then the General Manager shall certify to that fact in the annual Red Flag Report to the Board of Directors.

C. Passwords

1. Passwords are used for various purposes at DCEC. Some of the more common uses include: user-level accounts, web accounts, email accounts, screen saver protection, and router logins. Since very few systems have support for one-time tokens (i.e. dynamic passwords which are only used once), everyone should know how to select strong passwords
2. Poor, weak passwords have the following characteristics:
 - The password contains less than eight characters
 - The password is a word found in a dictionary (English or Foreign)
 - The password is a common usage word such as:
 - Names of family, pets, friends, co-workers, fantasy characters, etc.
 - Computer terms and names, commands, sites, companies, hardware, software.
 - The words “REA”, “DCEC”, “Delhi”, or any derivation.
 - Birthdays and other personal information such as addresses and phone numbers.
 - Word or number patterns like aaabbb, qwerty, zyxwvuts, 123321, etc.
 - Any of the above spelled backwards.
 - Any of the above preceded or followed by a digit (e.g. secret1, 1secret)
3. Strong passwords have the following characteristics:
 - At least eight alphanumeric characters long.
 - Contain both upper and lower case characters (e.g., a-z, A-Z)
 - Have digits and punctuation characters as well as letters (e.g., 0-9, !@#\$%^&*()_+|~=\{\}[]”,’<>?)
 - Not a word in any language, slang, dialect, jargon, etc.
 - Not based on personal information, names of family, etc.
 - Try to create a password that can be easily remembered. One way to do this is create a password based on a song title, affirmation or other phrase. For example, the phrase might be: “This may be one way to remember” and the password could be: “TmB1w2R!” or “Tmb1W>r~” or some other variation.
4. Password Creation
 - All user-level and system-level passwords must conform to the guidelines for strong passwords described above.

- Users shall never use the same password for DCEC accounts as for other non-DCEC access (for example, personal ISP account, option trading, benefits, and so on).
- User accounts that have administrator/system-level privileges must have a unique password from all other accounts held by that user.
- Where Simple Network Management Protocol (SNMP) is used, the community strings must be defined as something other than the standard defaults of public, private, and system and must be different from the passwords used to log in interactively. SNMP community strings must meet password construction guidelines.

5. Password Change

- All system-level passwords (for example, root, enable, Windows Domain admin, application administration accounts, and so on) must be changed on a reasonable periodic basis.
- All user-level passwords (for example, email, web, desktop computer, and so on) must be changed at least every 90 days.
- Password cracking or guessing may be performed on a periodic or random basis by the General Manager or a designee. If a password is guessed or cracked during one of these scans, the user will be required to change it to be in compliance with the Password Construction Guidelines.
- Passwords may be required to be changed upon identification or notification of a cybersecurity incident or threat.

6. Password Protection

- Passwords must not be shared with anyone, including administrative assistants, secretaries, managers, co-workers, and/or IT contractor without the permission of the General Manager. In cases where a password is shared with another employee or IT contractor for a specific purpose and defined time period as approved by the General Manager, the password shall be changed by the password's owner at the conclusion of the approved activity or time period, whichever ends first.
- Passwords must never be shared with anyone other than General Manager approved employees or IT contractors, including friends and/or family members.
- Passwords must not be inserted into email messages or other forms of electronic communication.
- Do not reveal a password on questionnaires or security forms.
- Do not hint at the format of a password (for example, "my family name").
- Do not write passwords down and store them in an unlocked location in your office. Do not store passwords in a file on a computer system or mobile devices (phone, tablet) in clear text.
- Do not use the "Remember Password" feature of applications (for example, web browsers).
- Any user suspecting that his/her password may have been compromised must report the incident to DCEC's General Manager and change all passwords.

D. Anti-Virus Protection And Prevention

1. Virus Protection Overview

All computing systems, both physical and virtual, connected to the Cooperative network shall have an anti-virus and anti-malware application installed, configured, activated and updated with the latest threat definitions. The Cooperative network shall include the office headquarters and any location connected via virtual private network tunnel to the office headquarters (e.g., operations shop and substations). This anti-virus and anti-malware software application must be capable of real-time scanning protection of files and applications running on the target system.

2. Guidelines

- Employees shall be instructed NOT to trust any other source for virus protection patches.
- Ensure that the current version is installed with anti-virus updates as they become available. Updates shall be no more than four weeks out of date.
- The anti-virus and malware software should be configured so as to always scan removable media and devices attached to cooperative computers prior to use. If this is not an available option, this can be accomplished by opening the anti-virus client software and selecting the appropriate media and manually executing a scan.
- Whenever new threats are identified, and determined by the General Manager to be of sufficient concern to cooperative business, the General Manager shall notify all corporate computer users about the new threat and appropriate measures to take, if any.
- Virus or malware infected computers must be isolated from the Cooperative's network until they are verified as virus-free.
- Employees will be educated about safe anti-malware practices such as, but not limited to;
 - Not opening unexpected attachments
 - Not downloading files from unknown sources
 - Deleting spam, chain mails, junk emails
- To expedite the recovery from any virus/malware threats the General Manager shall ensure that all critical network data and system configurations are backed up in accordance with this policy.

E. Backup and Recovery

1. Backup Overview

DCEC requires that server computer systems be backed up on a regular basis and that the backup media is located/stored in a secure off-site location. The purpose of the systems backup is to provide a means to restore the integrity of the computer systems in the event of a hardware/software failure or physical disaster and provide a measure of protection against human error or the inadvertent deletion of important files. Systems backups are not intended to serve as an archival copy or to meet records retention requirements.

- The frequency and extent of backups must be in accordance with the importance of the information and the acceptable risk as documented in this policy.

- DCEC information technology backup and recovery processes for each system and service should be annually reviewed by the General Manager.
- Backup procedures should be periodically tested to ensure that the IT resource is recoverable.
- Procedures for the offsite backup storage should be reviewed periodically.
- Backup media must be readily identified by appropriate labeling, and noted in a centralized log as to its physical storage location.
- All critical information used on workstations should be placed on networked file server drives for backup.

2. Network Storage Structure

DCEC has network servers in place in Delhi, NY. DCEC management and staff have file storage folders allocated for their account on network servers. These storage areas are usually referred to as the users "X: drive", where X denotes a mapped storage area on a network server as described below;

H: Drive - Users personal folder on the network server

When the user successfully logs on to their workstation, network connections are established to these folders, which can then be accessed as the "X: Drive" in Windows Explorer, Microsoft Word, Excel, and other software programs. Files can be copied from the user's workstation to their "X Drive", or software programs may be configured to save files directly to these mapped drives. These mapped drives are backed up to network storage and removable media. The removable media shall be rotated to an off-site storage facility and securely stored to provide for security and disaster recovery.

3. Storage of User Data Files

In order to be able to recover lost data, management and staff should store essential data files requiring backup to one of the network mapped drives. Data files on the user's local workstation will generally not be recoverable if the drive fails. Appropriate use of network storage will ensure ample capacity for archival storage of user data files. Users should store and maintain data files (or current copies) that are important to the company and that would be costly or impossible to recreate, on the network mapped drives. Users should not store non-business or non-essential data files on the network drives. No data files should be stored on thumb drives or other portable data storage devices and removed from DCEC facilities, except as authorized by the General Manager.

4. Backup Schedule

The systems backups will consist of regular full and incremental backups in accordance with Appendix A, "DCEC Backup Schedule by System".

5. Documentation

DCEC information technology backup and recovery processes for each system and service must be documented by the General Manager.

- Backup documentation includes identification of all critical data, programs, documentation, and support items that would be necessary to perform essential tasks during a recovery period.

- Documentation of the restoration process must include procedures for the recovery from single-system or application failures as well as a total data center disaster scenario.
- Backup and recovery documentation will be reviewed and updated annually to account for new technology, business changes, and migration of application to alternative platforms. Recovery procedures will be tested on an annual basis where feasible.

6. Backup verification

Test restores from backup archives must be performed at least annually where feasible. This ensures that both the archive media and backup procedures work properly. It must at least once be proven that complete data restoration is possible. This ensures reliable testing as to whether:

- Data restoration is possible
- The data backup procedure is practical
- There is sufficient documentation of the data backup process, thus allowing a substitute to carry out a data restoration if necessary
- The time required for the data restoration meets the availability requirements

7. Offsite Storage

In order to provide disaster recovery capability, backup media are rotated to an offsite storage location from the backup source. Backup media are maintained in offsite storage according to the schedule outlined in Appendix A, DCEC Backup Schedule by System"

8. File Recovery

In order to have a file restored from the backup archive, the user should contact the General Manager and provide the date of the last known good version of the file – this will help identify the set of backup media to use in attempting to restore the file.

Files can usually be restored within a few hours or less. DCEC cannot restore data files which were not archived on the network servers. As the media is rotated, users should request restoration of data files as soon as possible to prevent data being overwritten on the backup media.

9. Open Data Files

The backup server software is unable to archive data files which are open at the time the backup is run. Each user should ensure that all files that are to be archived are closed at the end of each business day.

10. Backup Failures

All backup failures will be logged and investigated as soon as practical upon detection.

F. Unacceptable Use

The lists below are by no means exhaustive, but attempt to provide a framework for activities which fall into the category of unacceptable use. The following activities are strictly prohibited, with no exceptions:

1. System and Network Activities

- Under no circumstances is an employee of DCEC authorized to engage in any activity that is illegal under local, state, federal or international law, while utilizing DCEC owned resources.
- Violation of the rights of any person or company protected by copyright, trade secret, patent or other intellectual property, or similar laws or regulations, including but not limited to, the installation or distribution of “pirated” or other software products that are not appropriately licensed for use by DCEC.
- Unauthorized copying of copyrighted material including, but not limited to, digitization and distribution of photographs from magazines, books or other copyrighted sources, copyrighted music, and the installation of any copyrighted software for which DCEC or the end user does not have an active license is strictly prohibited.
- Exporting software, technical information, encryption software or technology, in violation of international or regional export control laws, is illegal. The appropriate management should be consulted prior to export of any material that is in question.
- Introduction of malicious programs into the network or server (e.g., viruses, worms, Trojan horses, e-mail bombs, etc.)
- Using DCEC computing assets to actively engage in procuring or transmitting material that is in violation of sexual harassment or hostile workplace laws in the user’s local jurisdiction.
- Making fraudulent offers of products, items or services originating from any DCEC account.
- Making statements about warranty, expressly or implied, unless it is a part of normal job duties.
- Effecting security breaches or disruptions of network communication. Security breaches include, but are not limited to, accessing data of which the employee is not an intended recipient or logging into a server or account that the employee is not expressly authorized to access, unless these duties are within the scope of regular duties. For purposes of this section, “disruption” includes, but is not limited to, network sniffing, pinged floods, packet spoofing, denial of service (DOS), and forged routing information for malicious purposes.
- Port scanning or security scanning is expressly prohibited unless prior notification to General Manager is made.
- Executing any form of network monitoring which will intercept data not intended for the intercepting employee, unless the activity is a part of the employee’s normal job/duty.
- Circumventing user authentication or security of any computer, network or account.
- Interfering with or denying service to any user other than the employee’s computer (for example, denial of service attack).
- Using any program/script/command, or sending messages of any kind with the intent to interfere with, or disable, a user’s terminal session, via any means, locally or via the Internet/Intranet/Extranet.
- Providing information about, or lists of, DCEC employees or members to parties outside DCEC without prior approval of the General Manager.

- Viewing, storing, disseminating, or printing pornography.

2. Email and Communications Activities

The e-mail system is the property of DCEC and as such shall not be misused in any of the following manner:

- Sending unsolicited email messages, including the sending of “junk e-mail” or other advertising material to individuals who did not specifically request such material (e-mail spam), unless part of a corporate approved targeted marketing campaign.
- Any form of harassment via email, telephone, or paging, whether through language, frequency, or size of messages
- Send or forward e-mails including any of the following: disruptive or offensive messages, still images, audio, or video images, including but not limited to offensive comments about race, gender, disabilities, age, sexual orientation, pornography, religious beliefs and practice, political beliefs, or national origin. If you receive an email of this nature, promptly notify your immediate supervisor or manager.
- Forge or attempt to forge e-mail messages.
- Disguise or attempt to disguise your identity when sending e-mail.
- Send e-mail messages using another person’s e-mail account unless authorized to do so.
- Copy a message or attachment belonging to another user without permission of the originator.
- Creating or forwarding “chain letters”, “Ponzi” or other “pyramid” schemes of any type.
- Posting the same or similar non-business-related messages to large numbers of Usenet Newsgroups, or message boards.

3. Internet Access Activities

The following uses of the Internet, either during working hours or personal time, using DCEC equipment or facilities, are strictly prohibited:

- Access, retrieve, or print text and graphics information, which exceeds the bounds of generally accepted standards of good taste and ethics.
- Access, retrieve, store, disseminate, or print pornography.
- The Internet may not be used to access other systems for which the user has no authorization.
- The Internet or Internet connections shall not be used to access or transfer information that is in violation of Local, State, Federal, or copyright laws, or that contradicts the intent or spirit of these policies and procedures.
- Engage in personal commercial activities on the Internet, including offering services or merchandise for sale.
- Engage in any activity which would compromise the security of any DCEC computer or system.
- Endorse any product or services, participate in any lobbying activity, or engage in any active political activity. The prohibition against engaging in any political activity or fundraising activity does not apply to employees who engage in such activities during the performance of their job responsibilities.
- Employees and contractors working for DCEC are prohibited from initiating non-work-related Internet sessions using DCEC information resources from remote locations. That is,

employees shall not connect into DCEC resources from home or other non-DCEC locations for the purpose of participating in non-job-related Internet activities.

- Employees and contractors working for DCEC shall not engage in the transmittal of DCEC information or data for non-business purposes and/or personal gain or benefit.

G. Training and Due Diligence

All employees shall participate in and successfully complete ongoing and periodic training programs (online and in-person) created or provided by DCEC covering a wide range of electronic information and cyber-related topics such as recognizing and reporting phishing (malicious email), smishing (malicious texting) and other active/passive malware through removable media (USB).

H. Compliance

1. Compliance Measurement

The General Manager will verify compliance to this policy through various methods, including but not limited to, business tool reports, internal and external audits.

2. Exceptions

Any exception to the policy must be approved by the General Manager in advance.

3. Non-Compliance

An employee found to have violated this policy may be subject to disciplinary action in accordance with the Cooperative's employee relations policies.

I. Related Standards, Policies, and Processes (cross references to industry standards)

Adapted from the work of the Kentucky Association of Electric Cooperatives (KAEC) Information Technology Association, which was likewise derived from

- "Acceptable Use Policy" @ <http://www.sans.org/security-resources/policies/general/doc/acceptable-use-policy>
- "Malware Defenses" @ <http://www.sans.org/critical-security-controls/control/5>

J. Definition of Terms

- **Chain Letter** – Chain letter (email) is a term used to describe emails that encourage you to forward them onto someone else
- **Malware** – a general term used to refer to a variety of forms of hostile or intrusive software such as; computer viruses, worms, Trojan horses, ransomware, spyware, adware, scareware, and other malicious programs
- **Ponzi** – A Ponzi scheme is a fraudulent investment operation that involves paying returns to investors out of the money raised from subsequent investors
- **Pyramid Scheme** – A fraudulent scheme in which people are recruited to make payments to the person who recruits them while expecting payments from the persons they recruit

- **Simple Network Management Protocol (SNMP)** - is a popular protocol for network management. It is used for collecting information from, and configuring, network devices, such as servers, printers, hubs, switches, and routers on an Internet Protocol (IP) network.
- **Single Sign On** - a session/user authentication process that permits a user to enter one name and password in order to access multiple applications.
- **Spam** – Unauthorized and/or unsolicited electronic mass mailings
- **Spyware** – malware that aids in gathering information about a person or organization without their knowledge and that may send such information to another entity without the consumer's consent, or that asserts control over a computer without the consumer's knowledge
- **Virus** – a computer program or piece of code that is installed on, or executed by any computer without the knowledge of the owner and runs against the owner's wishes. Viruses are often destructive and malicious.

RESPONSIBILITY: General Manager

DELAWARE COUNTY ELECTRIC COOPERATIVE, INC.

Approved by the Board of Directors	May 26, 2015
Revised by the Board of Directors	Jun 27, 2017
Reviewed by the Board of Directors	Apr 27, 2021
Revised by the Board of Directors	Aug 23, 2022

Appendix A: DCEC Backup Schedule by System

System	Responsible Party	Schedule
iVUE ABS CIS OMS Admin Cash Register	NISC Technical Services	Nightly Backup to an offsite location.
GIS Database	ISD Contractor – configures backup executable DCEC Admin Assistant – Changes Tape Daily DCEC Finance Manager – takes tape to bank safe deposit box weekly	Nightly Backup to Windows Server and indirectly to on-site removable media. Weekly transfer of backup tape to off-site safety deposit box.
Windows Server	ISD Contractor – configures backup executable DCEC Admin Assistant – Changes Tape Daily DCEC Finance Manager – takes tape to bank safe deposit box weekly	Nightly Backup to on-site removable media. Weekly transfer of backup tape to off-site safety deposit box.
SCADA (Survalent) Server	ISD Contractor – configures backup executable	Nightly Backup to Windows Server, which is then backed up as described above.
NISC Call Capture Interactive Voice Response (IVR) Server	NISC Technical Services	No regular backup. All member-specific data is written directly to the CIS database and backed up. The IVR software itself could be recreated from images managed by NISC.

Individual workstations, portable computers, and hand-held devices are not backed up. Only those files stored on DCEC's central servers are backed up in accordance with this schedule.

POLICY

SUBJECT: Records Management, Retention, and Public Access

POLICY:

The purpose of this policy is to ensure a responsible treatment of all records created by or under the control of the Cooperative. The policy shall establish procedures that will be followed by the Cooperative relating to the maintenance, storage, and destruction of, and access to, records and related information. This policy also ensures that the Cooperative will use due care and consideration in the collection, use and maintenance of personal information ("Information") to keep it confidential in nature and protect it from release to unauthorized third-parties.

PROCEDURE:

The CEO/General Manager shall be the Records Custodian responsible for supervising all of the Cooperative's retention practices and procedures and ensuring that appropriate internal controls are implemented. This includes responsibility for assuring that the Cooperative maintains and protects membership records, accounting records, corporate records, insurance records, employee records, and tax records in accordance with all laws, regulations and generally accepted practices and that the same be stored in locations to ensure their safe and long-term security.

Records of the Cooperative, which may be in electronic or paper form, shall be retained in accordance with these guidelines. Records shall be destroyed after the requisite retention period, if any, has passed. Records stored electronically by the Cooperative's iVue suite of software applications may be stored longer than the required retention period at the discretion of the CEO/General Manager. A log or other documentation of records destruction may be created to track compliance and assist in evaluating the effectiveness of this policy. Pending or potential litigation, governmental investigation and other circumstances may require a "hold" or suspension of regularly scheduled destruction of records or other information. Employees will be promptly notified of any such hold by the CEO/General Manager.

Retention of Records: Records shall be maintained for as long as the period stated in the schedule appended to this policy. The retention schedule will be reviewed periodically and amended as needed to reflect changing legal requirements, business needs or evolving practices. Paper and electronic records and other information shall be maintained in the formats and/or media that ensure a life expectancy that, at a minimum, preserves the records for as long as specified in the schedule.

Destruction of Records & Other Information: Unless a legal hold is in effect, destruction of records shall occur within six months after the time period stated in the schedule has been met. Other information should be discarded as soon practicable after it has served its purpose unless subject to a legal hold.

Destruction may occur by the following acceptable methods:

a) Paper Records:

- Recycling or trash if no sensitive, personally identifiable or confidential information is included.
- Shredding, burning, or pulverizing if sensitive, personally identifiable or confidential information is included

b) Electronic Records:

- Deletion of records and data on shared network files, computer desktop and laptop hard drives, including personal copies.
- Deletion of distributed data and records on peripheral devices and portable storage media (e.g. PDAs, memory sticks, CDs, floppy disks, etc.)
- Erasing or recycling of magnetic tapes

Suspension of Destruction or "Legal Hold": A legal hold is the process for suspending the destruction of records and other information that becomes necessary for the Cooperative to preserve for various reasons, such as:

- A complaint is filed against the Cooperative
- A credible threat of litigation has been received by the Cooperative
- A discovery request is received
- A records preservation order has been issued
- A subpoena has been served on the Cooperative
- A governmental, regulatory or law enforcement agency has instituted an investigation
- An event has occurred that resulted in substantial damage to property or death or serious bodily injury to a person
- A circumstance has arisen that is likely to cause the Cooperative to file a lawsuit against someone or some entity
- An employee has made a complaint, allegation, or report regarding a violation of law, Cooperative policy, or other improper conduct prompting an internal investigation

If a staff member of the Cooperative receives any such complaint, request, subpoena or inquiry, he or she should immediately submit it to the CEO/General Manager. Following consultation with legal counsel, a determination will be made regarding the need to preserve records. If such a need is determined to exist, then the CEO/General Manager will issue a legal hold notification.

The legal hold requires the preservation of all records and other information detailed in the legal hold notice until otherwise notified. With regard to electronic records and information, all such active, distributed and archived materials must be preserved. Back-up tapes that only contain records or other information redundant to that which is being maintained as active or archived data, will be recycled or destroyed in accordance with the Cooperative's regular back-up tape practice.

If a computer or peripheral device (e.g. smart phone, tablet,, external disk drive, etc.) has records or other information stored on it which are subject to the legal hold, then any scheduled replacement of that computer or device must be suspended until the stored materials on such computer or device are copied to a secure medium before the computer or device is taken out of service.

Members' Personal Information

- 1) Member-consumers shall, upon request by the member, be provided access to service, billing, capital credit and other related account information about themselves and may correct any inaccurate, incomplete, or untimely information.
- 2) The Cooperative shall use Information about member-consumers in a responsible way only for the purpose of carrying out its operations and to the benefit of member-consumers. The Cooperative may not disclose such Information to affiliates, partners and other third-parties unless specifically permitted to do so by the member, either in writing or on a recorded phone line. Member-consumers may request that their information not be shared with affiliates for the offering of new products and services. The Cooperative will not sell, rent, loan, exchange, or otherwise release mailing lists or telephone lists of member-consumers for marketing purposes, nor to non-affiliated third parties without the prior written consent of the member-consumer.

Public Access to Records

It is recognized that the Cooperative must protect certain business information and membership data. This policy outlines the practices and procedures for dealing with requests for information, including access to minutes of Board meetings, by 3rd-parties. All requests for information must be in writing and addressed to the CEO/General Manager. In the event the Cooperative receives such a request for information, the following procedure shall be followed:

- 1) The office employee receiving the request shall determine that the following information has been provided by the individual making the request:

- a. Name and address of requester
 - b. Company or professional affiliation (if any)
 - c. Account #
 - d. Purpose or reason for the request
- 2) Upon receipt of the information, office personnel shall advise the individual in writing that the request will be referred to the CEO/General Manager and that a response will be provided within 5 business days.
 - 3) The CEO/General Manager shall review the request and, at his discretion, determine whether the requested access satisfies legal and policy requirements. Access shall be granted in response to all requests for the Cooperative's audited financial statements and for any Cooperative policy.
 - 4) Written notification back to the requester will then be made.
 - 5) If access is granted to certain information, such as meeting minutes, the information will be available as "view only" and not available to be copied.

In no way does this policy permit access to meeting minutes of Executive Sessions of the Board or to other privileged Cooperative information (e.g. member information, payroll, etc.). Further, employees shall not divulge, disclose or provide business-related information or membership information (e.g. membership lists, address information, etc.) without prior approval by the CEO/General Manager. Employees may never access customer records for non-business purposes.

Compliance & Questions: Every employee, director, and agent of the Cooperative is required to comply with this policy. Training will be provided as needed to ensure that everyone subject to the policy is familiar with its provisions and understands the specific responsibilities and tasks associated with carrying out the policy. Periodic compliance audits and testing of retention, legal hold, and destruction procedures may be undertaken at the direction and supervision of the CEO/General Manager. The CEO/General Manager shall make periodic reports to the Board of Directors regarding overall compliance.

Questions about this policy should be directed to the CEO/General Manager.

Reporting of Suspected Noncompliance: Should any employee, director or agent of the Cooperative become aware of information indicating that a person responsible for the retention or destruction of records is not in compliance with this policy, such information shall be promptly reported to the CEO/General Manager.

RESPONSIBILITY: CEO/General Manager

DELAWARE COUNTY ELECTRIC COOPERATIVE, INC.

Approved by Board of Directors	December 18, 2013
Reviewed by Board of Directors	November 24, 2015
Revised by Board of Directors	December 19, 2017
Revised by Board of Directors	December 17, 2019

This policy combined former policies “Records Management & Retention,” “Protection of Consumer Personal Information,” “Membership Records,” “Public Accessibility,” and “Records, Maintenance & Public Access” effective December 18, 2013.

Retention Schedule

Record Description	Minimum Retention Period
Annual reports	Life of corporation
Organizational documents	Permanently
Deeds, Mortgages, and the like	Permanently
Board meeting Minutes and Resolutions	Permanently
Contracts	7 years beyond contract life
General Ledger	Permanently
Bank Statements	7 years
Accountants' and auditors' reports	7 years
General Accounting Records	7 years
Journals	50 years
Daily Cash sheets	2 years
Insurance Records	7 years
Transformer history records	Life of transformer
Construction, Retirement & Maintenance work orders (closed)	7 years
Staking Sheets	Permanently
Plant ledgers/Continuing Property Records	Permanently
Construction work in progress ledgers	Until WO closed, then part of WO record
Retirement work in progress ledgers	Until WO closed, then part of WO record
Procurement/Purchase Orders	7 years
Records of sales of scrap	7 years
Rate schedules/Sales Records	7 years
Tax records	7 years after settlement
Statements of funds and deposits	7 years
Budgets	7 years
Safety, motor vehicle and driver license records	7 years
Payroll records and Timecards	7 years
Personnel files - I-9 Forms	3 years from date of hire or 1 year from termination, whichever is later
Personnel files - New Hire and Annual Employee Notice of Pay Rate and Payday	7 years
Personnel files - Applications & Resumes of Non-Hires	7 years from date position filled
Personnel files – Job Postings & Advertisements filed by position filled	7 years from date position filled
Personnel files – Hiring Documents, Recruitment Documents, Policy Acknowledgement Forms, Job Descriptions, Pay Rate and Compensation Information,	Permanently [Medicals must be in separate file]



Performance Reviews, Disciplinary Documents, Employment Status Changes, Paid Family Medical Leave records, Training Records, Physical Examinations, other Medical Records, Employment and Aptitude Tests, Termination Documents, Exit Interviews	
Records of Discrimination Charges/Complaints	The last of: 7 years after employee's termination, a final disposition of the action, or the date the applicable statute of limitations expires if no action is brought
Personnel files, Workers Compensation Records	Permanently [Must be in separate file from main employee file]
Personnel files, OSHA Injury/Illness Records (Form 300/301/300A)	7 years
Employee Benefit Plans	Permanently
Personnel files – Employee Benefit Individual Application, Enrollment Forms	Permanently
Personnel files – Wage Garnishment Orders	7 years from end of garnishment
Personnel files – Employment Certificates for Employees Under 18	Retain only while minor is employed, then return to minor.
Personnel files, Other	Permanently [Medicals must be in separate file]
Environmental records	7 years
Licenses and Permits	Permanently or until no longer hold license
Meter history	Life of meter

GENERAL POLICY No. 305 SUBJECT: RETENTION, MAINTENANCE, AND DISPOSITION OF RECORDS

- I. PURPOSE: The purpose of this policy is to ensure the reasonable and good faith retention of all records created by or under the control of the Cooperative, whether paper or electronic, that are necessary or advisable to retain for: business operations; historical value; accounting, audit, tax and financial purposes; compliance with applicable law; possible future use in litigation involving the Cooperative; and possible future use in an official proceeding or governmental investigation, audit or other matter. Other records, which are not necessary to retain for these reasons, shall be destroyed in accordance with the guidelines set forth in this policy. All other information that is not a record should be discarded after it has fulfilled its purpose to avoid the unnecessary expense and effort that would be required to preserve it. A legal hold notice shall be issued when it becomes necessary to preserve a record or other information otherwise scheduled or due for ordinary and appropriate destruction in accordance with this policy.
- II. DEFINITIONS: Unless otherwise indicated in this policy, the following terms will have the meanings provided in this section.
 - a. Active Data/Records – Electronic or paper records and information that are presently in use or are immediately accessible to users.
 - b. Archival Data/Records – Electronic or paper records and information that are not directly accessible to users, but which are maintained long term and accessible with some effort.
 - c. Backup Data/Records – Electronic or paper records and information that are not presently in use and which are routinely stored on portable media (e.g., disks, magnetic tape) and/or off-site and are a source for disaster recovery.
 - d. Distributed Data/Records – Data living on portable media or “non-local” devices (e.g., PDAs, smart phones, employee home computer, application service provider, ISPs). Most are probably “active” data.
 - e. ESI – “Electronically Stored Information” – Any file, document, data, image, database, etc. that is stored on a computing device or electronic medium, including but not limited to servers, computer desktops and laptops, cell phones, hard drives, flash drives, PDAs, CDs or DVDs, floppy disks and magnetic tapes.
 - f. Obsolete System Data – Information which has retained some importance or usefulness to the Cooperative for a period of time but has been created or stored by the use of software and/or hardware that has subsequently become obsolete or been replaced.
 - g. Record – Information (paper or electronic) recorded in a tangible form that is created or received by the Cooperative and documents some aspect of its operations. A record has some enduring value to the Cooperative that merits its retention for some period of time. Records include originals and copies of contracts and other legal documents, memos, reports, forms, checks, accounting journals and ledgers, work orders, drawings, maps, images, and photographs. Records may be found in various electronic or machine-readable formats, including without limitation, CD-ROMs, DVDs, tape recordings, voice mail messages, e-mails, microfiche, web pages, computer and other electronic files.
 - h. Other Information/Data – “Other information” or “data” are any other material that is of a transitory nature, that after serving its limited purpose or being transferred to a more permanent form, or being incorporated with other record material, the Cooperative has no need to retain except in the event of a legal hold. Some examples are notes, drafts, routine correspondence, informational or courtesy copies, extra copies of filed or preserved records and emails containing non-record information (scheduling or logistics information, thank you notes, etc.)
- III. PROCEDURE:
 - a. An appointed Records Compliance Manager shall be responsible for supervising the Cooperative’s retention practices and procedures, ensuring that the appropriate internal controls are implemented.

- b. Each department shall appoint a Records Custodian who shall be responsible for instituting and monitoring policy compliance within the department.
- c. The Records Custodian for each department shall submit an annual Certification of Records Compliance & Destruction, the form marked Appendix V, to the Records Compliance Manager and update the Master Index Appendix IV.

IV. POLICY:

- a. Records of the Cooperative – Records of the Cooperative, which may be in electronic or paper form, shall be retained in accordance with these guidelines. Records that do not need to be retained shall be destroyed after the requisite retention period, if any, has passed. A log or other documentation of records destruction may be created to track compliance and assist in evaluating the effectiveness of this policy. Pending or potential litigation, governmental investigation and other circumstances may require a “hold” or suspension of regularly scheduled destruction of records or other information. Employees will be promptly notified of any such hold by the CEO/General Manager or the Human Resources Manager. The format of the hold notification is shown on Appendix III to this policy.
- b. Retention of Records – Records shall be indexed and retained in a manner that ensures their easy accessibility. Records shall be maintained for as long as the period stated in the schedule appended to this policy, Appendix II, which schedule is based on the minimum periods required by applicable state or federal law and on necessity for ongoing business purposes. The retention schedule will be reviewed periodically and amended as needed to reflect changing legal requirements, business needs or evolving practices. Paper and electronic records and other information shall be maintained in the formats, medium and at the locations provided in the master index, which media shall ensure a life expectancy that, at a minimum, preserves the records for as long as specified in the schedule. All records that require transfer to storage media that is different from the media in which the document was originally created or is being maintained requires documentation of the transfer and verification for accuracy.
- c. Destruction of Records & Other Information – Unless a legal hold is in effect, destruction of records shall occur within four (4) weeks after the time period stated in the schedule has been met, if reasonably practical. If not reasonably practical, then such destruction shall occur as soon thereafter as is reasonably practical. Other information should be discarded as soon as practicable after it has served its purpose, unless subject to a legal hold. Destruction may occur by the following acceptable methods:
 - i. Paper:
 - 1. ♣ Recycling or trash if no sensitive, personally identifiable or confidential information is included
 - 2. ♣ Shredding, burning or pulverizing if sensitive, personally identifiable or confidential information is included ii
 - ii. Electronic:
 - 1. ♣ Deletion of records and data on shared network files, computer desktop and laptop hard drives, including personal copies
 - 2. ♣ Deletion of distributed data/records on peripheral devices and portable storage media (e.g., PDAs, memory sticks, CDs, floppy disks, etc.)
 - 3. ♣ Erasing or recycling of magnetic tapes
- d. Suspension of Destruction/“Legal Hold” – A legal hold is the process for suspending the destruction of records and other information that becomes necessary for the Cooperative to preserve. A legal hold may need to be issued for various reasons, such as:
 - i. ♣ A complaint is filed against the Cooperative
 - ii. ♣ A credible threat of litigation has been received by the Cooperative
 - iii. ♣ A discovery request is received
 - iv. ♣ A records preservation order has been issued
 - v. ♣ A subpoena has been served on the Cooperative
 - vi. ♣ A governmental, regulatory or law enforcement agency has instituted an investigation

- vii. ♣ An event has occurred that resulted in death or serious bodily injury
- viii. ♣ A circumstance has arisen that is likely to cause the Cooperative to file a lawsuit against someone or some entity
- ix. ♣ An employee has made a complaint/allegation/report regarding a violation of law, Cooperative policy or other improper conduct prompting an internal investigation

If a staff member of the Cooperative receives any such complaint, request, subpoena or inquiry, he/she should immediately submit it to the CEO/General Manager. Following consultation with legal counsel, a determination will be made regarding the need to preserve records. If such a need is determined to exist, then the Cooperative's attorney will issue a legal hold notification.

The legal hold requires the preservation of all records and other information detailed in the legal hold notice. With regard to electronic records and information, all such active, distributed and archived materials must be preserved. Back-up tapes that only contain records or other information redundant to that which is being maintained as active or archived data, will be recycled or destroyed in accordance with the Cooperative's regular back-up tape policy/practice. If a computer or peripheral device (mobile phone, external disk drive, etc.) has stored on it records or other information subject to the legal hold, then any scheduled replacement of that computer or device must be suspended until the stored materials on such computer or device are copied to a secure medium before the computer or device is taken out of service. Such steps must be documented in a hardware replacement, IT maintenance or other log noting the dates of such copying and the equipment replacement, the person responsible for the copying and replacement and the location of the copied materials.

- e. Compliance & Questions – Every employee, director and agent of the Cooperative is required to comply with this policy. Training will be provided as needed to ensure that everyone subject to the policy is familiar with its provisions and understands the specific responsibilities and tasks associated with carrying out the policy. Periodic compliance audits and testing of retention, legal hold and destruction procedures will be undertaken at the direction and supervision of the General Manager/CEO or the Human Resource Manager. The form marked Appendix I attached to this Policy shall be completed and signed by all employees. The form marked Appendix V attached to this Policy shall be completed and signed by those employees who are responsible for the retention or destruction of the Cooperative's records. Questions about this policy should be directed to the Records Compliance Manager.
- f. Reporting of Suspected Noncompliance – Should any employee, director or agent of the Cooperative become aware of information indicating that a person responsible for the retention or destruction of records is not in compliance with this policy, such information shall be promptly reported to the CEO/General Manager.

V. RESPONSIBILITY: It shall be the responsibility of the CEO/General Manager to administer this policy.

VI. PRIMACY OF POLICY: This policy supersedes any existing policy that may be in conflict with the provisions of this policy.

APPROVED BY BOARD OF DIRECTORS

MMM DD YYYY

Appendix I

Delaware County Electric Cooperative, Inc.

Acknowledgment

I acknowledge that I have received, read and will abide by Policy #305, the Cooperative's Records Management Policy, distributed to me on

_____ (date). I will bring any questions I have regarding this policy to the Cooperative's Records Coordinator. I further understand that I am required to complete periodic training on records procedures. The records or types of records subject to the retention and destruction requirements of Policy #305 of which I have, or may reasonably be expected to have, the custody, possession, or control of are:

(Signature)

(Print Name)

Date: _____

CATEGORY/DESCRIPTION RETENTION PERIOD

ACCOUNTING

ACCOUNTS PAYABLE

Check Registers	5 years
Invoices/Vouchers.....	5 years
Invoices/Vouchers – Plant Items	Retirement of Plant + 6 years
Aged Trial Balance	2 years
Daily Cash Sheets.....	1 Year
Invoice OAR Register.....	5 years

AUDIT REPORTING (CPA Audit)

Audit Reports.....	Life of Corporation
Audit Work Papers.....	Report date + 3 years

BANKING

Bank Reconciliation's.....	Destroy Audit plus 3 years
Bank Statements.....	Destroy Audit plus 3 years
Canceled/Void Checks – Standard.....	6 years
Deposit Slips.....	6 years

LEDGERS

General Ledger.....	10 years
Journal Entries	10 years
Subsidiary Ledgers.....	25 years
Transportation Reports.....	25 years
Year-end Trial Balance	25 years

PATRONAGE CAPITAL

Assignments/Transfers/Name Changes.....	Life of Corporation
Patronage Capital Allocations Records	Life of Corporation
Patronage Capital Register.....	6 years
Patronage Capital Estate Check Register.....	Life of Corporation

PAYROLL

Check Registers	6 years
Employee Exemption Certificates (W4).....	Superseded + 4 years
Labor Distribution Journal.....	6 years

Payroll Change Form.....	4 years
Payroll Records.....	4 years
Time Sheets.....	3 years
New Hire Reporting.....	6 years
PLANT & DEPRECIATION	
Continuing Property Records (CPR's).....	Retirement of Plant + 6 years
Utility Plant Ledgers.....	Life of Corporation
Depreciation Records.....	Life of Corporation
TAXES	
Crebs Bond Credit (8038-CP).....	Final Filing+10
Employment Tax Returns (940, 941).....	Tax Payment + 4 years
Federal Income Tax Returns (990)	Life of Corporation
Federal Income Tax Exemption Letter	Life of Corporation
Gross Receipts Tax Returns.....	Settlement + 2 years
IRS Form 1099.....	6 years
IRS Form 5500.....	6 years
Letters of Determination.....	Life of Corporation
License and Applications.....	Superseded + 6 years
Property Tax Returns.....	Settlement + 6 years
Request for Taxpayer ID (W-9).....	Until Superseded
Sales, Use & Excise Tax Returns	3 years
Tax Information Returns.....	3 years
Wage & Tax Statements (W-2).....	Tax Payment + 4 years
BUDGETS (Capital & Operating)	3 years
FINANCIAL STATEMENTS	
Financial Statements Form 7 (Monthly/Yearly).....	Life of Corporation
Financial Statements (Management Reports).....	5 years
Audit Reports.....	Life of Corporation
LOAN ADMINISTRATION	
Loan Applications/Approvals.....	Paid in Full + 6 years
Loan/Mortgage Documents	Paid in Full + 6 years
Loan Requisition Statements	LFAR Audit + 6 years

Partial Release of Lien/Sale of Assets.....Lien release or Sale + 6 years

MISCELLANEOUS REPORTS

NYPA, NYISO, NYSEG, Nat Grid5 years

POWER COST REBATES/REFUNDS

Canceled Checks.....6 years

Rebate/Refund Register6 years

FEDERAL/STATE REGULATORY COMMISSION REPORTS

Forms EIA-8615 years

NY Year End Reports.....5 years

FEMA

Hazard Mitigation GrantsFEMA Audit + 6 years

PROCUREMENT - PURCHASING

Purchase Orders.....5 years

Purchase Order Register5 years

Overhead Allocation Records.....Audit + 6 years

Special Equipment Summaries.....Audit + 6 years

MEMBER SERVICES

BILLING RECORDS

Adjustments/Changes6 years

Billing Stubs.....3 years

Billing Reports/Register.....6 years

Consumer Ledgers.....6 years

Daily Recaps.....Destroy at Option after Audit

Historical Data FileLife of Corporation

Invoice Register6 years

Sales Analysis.....6 years

Security Deposit Records.....6 years after Payout

MEMBER & PUBLIC RELATIONS - EXTERNAL COMMUNICATIONS

Marketing Research Reports.....6 years

Annual ReportsLife of Corporation

News ReleasesLife of Corporation

Publications.....Life of Corporation

Internal Communications Publications.....	Life of Corporation
CUSTOMER SERVICE	
Complaints.....	3 years
Connect/Disconnect Orders.....	2 years
Customers' Account Adjustments.....	3 years
Membership Records.....	6 years after account is closed
Uncollectible Accounts (customer credit records).....	3 years
CONSERVATION RECORDS.....	6 years after audit
ADMINISTRATIVE, CORPORATE - GENERAL	
ANNUAL MEMBER MEETING	
Annual Meeting Minutes	Life of Corporation
Annual Reports or Statements to Members.....	6 years
BOARD OF DIRECTORS	
Board Packets.....	10 years
Board Policies & Procedures.....	Life of Corporation
Minute Books.....	Life of Corporation
Resolutions.....	Life of Corporation
Standing Committee Minutes	Life of Corporation
Sub-Committee & Ad-hoc Committee Minutes.....	Life of Corporation
COMMITTEES (INTERNAL)	
Agenda, Minutes & Notes.....	5 years
Correspondence.....	5 years
Reports.....	5 years
CONTRACTS & AGREEMENTS	
Mutual Aid Agreements.....	Until Superseded
Public Service Commission Agreements.....	Until Superseded
DEEDS	
Filed Originals	Property Disposition+ 6 years
FRANCHISES	
Filed Originals	Until Superseded
LEGAL SERVICES & LITIGATION	
Complaints/Disputes.....	Settlement + 10 years

Court Orders.....Settlement + 10 years
 Motions.....Settlement + 10 years
 Pleadings.....Settlement + 10 years

MANAGEMENT DOCUMENTS

Calendars.....Not to Exceed 1 year
 General Correspondence (not otherwise classified) ..Not to Exceed 1 year
 Interoffice Memos (not otherwise classified)Not to Exceed 1 year
 Presentation Materials.....Until Superseded
 Surveys (not otherwise classified)Until Superseded
 Telephone Messages.....Completion of Action
 Travel Itineraries & Reservations.....Completion of Travel
 Work Papers (not otherwise classified)At Discretion

ORGANIZATION & BYLAWS

Articles of Incorporation.....Life of Corporation
 Bylaws.....Life of Corporation
 Organization Charts.....Until Superseded

POLICIES & PROCEDURES

Department Procedures.....Until Superseded
 Personnel Benefits Handbook.....Until Superseded

RATES

Rates ScheduleUntil Superseded + 6 years
 Rate Study/Proposal.....Until Superseded + 6 years

RECORD RETENTION SCHEDULES

Retention Schedules.....Until Superseded
 Record Destruction ListLife of Corporation

GENERAL COMPLIANCE - ASSOCIATED ORGANIZATIONS

Annual ReportsUntil Superseded
 Articles & Bylaws.....Until Superseded
 Certifications.....6 years
 Miscellaneous Correspondence6 years
 Resolutions.....Until Superseded

ENGINEERING

CONTRACTS

Distribution Line Construction Contracts.....	Life of Corporation
Material Purchase Contracts.....	Life of Corporation
Joint Use Pole Agreement.....	Life of Corporation
Leases.....	Life of Corporation
Property Contracts	Life of Corporation
Service Contracts.....	Life of Corporation
Underground Permits/Agreements.....	Life of Corporation

CONSTRUCTION

Construction Work Plans.....	Life of Corporation
Construction Work Plan Amendments	Life of Corporation
Environmental Reports	Life of Corporation
Material/Inventory Records and Reports.....	LFAR Audit + 6 years
Staking Sheets.....	Life of Corporation
Work Orders – Maintenance.....	Life of Corporation
Work Orders – Construction.....	Life of Corporation
Work Order Inventories.....	Life of Corporation

FIXED ASSETS

Blueprints.....	Life of Structure
Deeds, Abstracts, etc.....	Sale of Asset
Drawings.....	Life of Corporation
Maps (aerial photos, geological maps)	Life of Corporation
Reports, Plans, Studies.....	Life of Corporation
Meter History Records.....	Life of meter
Substation Inspections & Tests.....	Life of Corporation
Substation & Transmission.....	Life of Corporation
Switch Installment Reports.....	Life of Corporation
Transformer History Records	Life of Transformer
Transformer Inspection Reports	Destroy at Option

RIGHT-OF-WAY/EASEMENTS

Correspondence.....	Property Disposition + 6 years
Originals.....	Property Disposition + 6 years

Construction Work Plans.....	LFAR Audit + 6 years
Construction Work Plan Amendments	LFAR Audit + 6 years
Environmental Reports	LFAR Audit + 6 years
RUS Form 219	LFAR Audit + 1 year
History Records	Life of Corporation
HYDRO RECORDS	
Plant Records.....	Life of Corporation
INFORMATION SERVICES	
Application Documentation.....	Until Superseded
Operating System Documentation	Until Superseded
Record Destruction Schedule.....	Life of Corporation
WAREHOUSE OPERATIONS & INVENTORY CONTROL	
Backorder Reports	Completion of Tax Audit
Inventory Lists (Materials & Supplies).....	7 years
Merchandise Sold.....	4 years
Receiving Reports.....	3 years
Requisitions.....	Destroy at Option after Audits
OPERATIONS	
AGREEMENTS/CONTRACTS	
Certificates of Insurance	Policy Period + 6 years
Equipment Contracts.....	Life of Equipment
Equipment Warranty Agreements.....	Life of Contract + 6 years
Tree Cutting Agreements.....	Life of Contract + 6 years
Vehicle Titles.....	Life of Vehicle
RELIABILITY RECORDS	
Major Storm Data/Restoration Records.....	6 years
Outage Reports.....	6 years
Service Interruption Logs & Reports.....	6 years
MAINTENANCE	
Damage Assessment Inspection Reports.....	15 years
DEPARTMENT OF LABOR	
Apprenticeship Agreements.....	Until Superseded

DEPARTMENT OF TRANSPORTATION

Driver's Qualification Records.....6 years

OSHA

Report of Occupational Injuries and Illnesses.....End of year + 5 years

SAFETY MANAGEMENT

Bucket Truck Test Reports.....3 years

High Voltage Glove Inspection Reports.....End of year + 5 years

Hot Stick Reports.....3 years

MSDS Sheets.....Until Superseded

Vehicle Inspection Checklists.....3 years

SAFETY TRAINING

Employee Safety Training Records.....Termination of Employee + 6 years

Safety ManualUntil Superseded

Safety Manual Revisions5 years

Federated Report of Visit.....15 years

HUMAN RESOURCES

EMPLOYEE BENEFIT ADMINISTRATION

Correspondence.....1 year

Distribution of Employee Plan Summaries.....6 years

Benefit Summary Plan DescriptionsExpiration + 6 years

Insurance Plan Rate Sheets.....Expiration + 6 years

Affordable Care Act Compliance Records.....Current + 3 years

Affordable Care Act forms 1094 and 1095.....Current + 3 years

Cafeteria Plan 125 Records.....Current + 6 years

EMPLOYEE SURVEYS

Survey ResultsUntil Superseded or Historical Value

COMPLIANCE

ADA/Civil Rights Actions.....Date of Record + 1 year

DRUG TESTING

Drug and Alcohol Program Summary ReportCurrent + 5

Drug and Alcohol Program ContractExpiration + 6

Drug Testing Results.....6 years

EQUAL EMPLOYMENT OPPORTUNITY

Affirmative Action Plans.....	3 years
Discrimination Claims.....	Final Disposition of Claim
Job Postings	1 year

FAMILY AND MEDICAL LEAVE

Compliance Documentation.....	3 years
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HIPAA

Compliance Documentation.....	6 years
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PERSONNEL FILES

Alien Registration (Form I-9).....	Hire Date + 3 years or Termination + 1 year -Whichever is longer
Apprenticeship Records.....	Termination + 3 years
Employee Benefit Records (excluding LTD)	Termination of emp and benefit + 6 years
Employee R&S Pension & 401k Plan Records	Plan Participant + 3 years
Personnel History File.....	Termination + 6 years
Personnel Medical File (non-work related)	Termination + 6 years
Personnel Medical File (work exposure or injury)	Termination + 30 years
Personnel Performance Evaluations	6 years

RECRUITMENT

Advertising.....	2 years
Application & Resumes (unsuccessful candidates)...	Date of Action + 2 year
Correspondence; Failure/Refusal to Hire.....	Date of Action + 2 year
Positions Descriptions.....	Superseded + 2 years

SALARY ADMINISTRATION

Reports.....	3 years
Wage & Salary Survey.....	Until Superseded or Historical value
Union Agreements and Prep Notes.....	Expiration + 6 years

WORKERS COMPENSATION

Claims.....	Settlement + 5 years
Policies.....	Expired + 3 years
First Report of Injury	30 years

INSURANCE LIABILITY & PROPERTY

Claims.....Date of injury + 30 years

Bodily Injury Claims.....Permanently

Policies.....Expiration + 3 years

Insurance Liability Claims.....Settlement + 6 years

APPROVED BY:

_____	_____
General Manager	Date

Appendix III

Delaware County Electric Cooperative Inc.

Sample Legal Hold Notification

To ensure that every employee, director and agent of the Cooperative will recognize and respond appropriately to a notification that certain records are now potentially relevant and necessary for litigation or a governmental investigation, this appendix provides a sample legal hold notification.

URGENT NOTICE

TO: Name all persons identified as likely to have relevant records including the designated Records Custodian or Coordinator

FROM: CEO/General Manager/Cooperative Attorney/Litigation Attorney

DATE:

RE: Your Obligation to Preserve Records & Other Information

The event/circumstance described below has triggered an obligation to preserve records and other information. Your assistance is necessary and required for the preservation of the Cooperative's records and other information to fulfill the Cooperative's legal obligations and/or preserve the Cooperative's rights. Failure to fully comply with this directive could result in harm or penalties against the Cooperative; therefore, employees could be subject to discipline, up to and including termination of employment, for failure to follow the directives in this notice.

Event or Circumstance Triggering the Need to Preserve Records (Description of lawsuit, investigation, occurrence, etc. If litigation, describe specific claims involved.)

Types of Records & Other Information to be Preserved

All paper and electronic records and other information that could be relevant to the above-described event or circumstance must be preserved – that is, retained and not deleted – including, without limitation: (Tailor description as needed to specific trigger event – such as, documents (including drafts & revisions), spreadsheets (including drafts and revisions), emails (sent & received), databases, calendars, presentations, image files, maps, voice messages, data generated based on Internet activity (cookies, cache, history files), computer usage logs, etc.)

When potentially relevant records or other information exist on multiple platforms or

media, for example: a file on a desktop computer, on a laptop computer, on a mobile device, on a portable storage medium such as a CD-ROM, and a paper copy, every copy must be preserved.

Any routine or planned destruction of these types of records or data that you are aware of and can control (e.g. a user's personal email setting to automatically delete messages older than a certain date) must be suspended for the period of this hold.

Time Period

All of the above described records and other information currently in your possession or under your control must be preserved (from this point forward until you are notified that this hold is lifted, or state specific time period if known).

Verification of Preservation

(Describe the actual steps that a recipient of this notice must take to verify preservation.

Different types of records or information may require different preservation methods, e.g. certain electronic files may be subject to automatic purging that requires an override or programming change.)

Contact Person(s)

If you have questions regarding this notice, or are aware of any other persons not listed as recipients of this notice—including retired employees, contractors, consultants or others—who should receive this notice, please direct all such questions and information to _____ (Provide name and contact details of the person overseeing the matter triggering the legal hold, such as the Cooperative's attorney or litigation counsel).

Reminders

Reminders will be sent to you periodically during the course of this (litigation, investigation, audit, matter) to ensure that you continue to preserve relevant information and to inform you of any change as the matter progresses that would affect your preservation obligations. Such a change could include a change in scope that could add additional categories of records or other information for preservation or may require you to take additional preservation or verification steps.

DCEC

CERTIFICATE OF RECORDS COMPLIANCE AND DESTRUCTION*This form documents the destruction of cooperative records in accordance with Policy #305*

Person Completing Form: _____

Department: _____

Records to Be Destroyed				
a) Record Series	b) Record Description	c) Date Range (mo/yr)	d) Location	e) Destruction Method

Destruction Approvals: We certify that the records listed above have been retained for the scheduled retention period, required audits have been completed, and no pending or ongoing litigation or investigation involving these record is known to exist.

Department Records Custodian (print)	Signature	Date
Records Compliance Manager (print)	Signature	Date
Records Destroyed By (print)	Signature	Date

Certification of Untimely Destruction or Loss of Records

_____ certifies that the below identified records were lost/destroyed prior to the expiration of the applicable retention period.

Signature

Date

Name

Title

Records Lost or Destroyed Prior to the Expiration of the Retention Period:

Record Description	Applicable Retention Period	Loss or Destruction (Describe event or circumstances)	Date & Time Loss or Destruction Occurred (If not known, it seems to make sense to note when the loss or destruction was discovered.)

Example for Appendix IV

Record Category/Description	Retention Period	Storage Media	Location(s)	Designated Responsible Person/Records Custodian/Records Coordinator/Dept
401 K/ R & S	3 Years	Paper	Top Drawer File Cabinet Patty's old office	Accounting
941'S FED WITH,STATE WITH,SUTA,FUTA,SALES TAX	Tax Payment +4 yrs	PAPER	FILE CABINET IN SCAN ROOM	Accounting
A/P INVOICES	5 Years	ELECTRONIC	RETRIEVER	Accounting
BPA LOW DENSITY	5 Years	ELECTRONIC	Y:LOW DENSITY DISCOUNT REPORT	Accounting
Capital Budget, Donation List		Electronic	Y:Capital Budget/Budget/Capital	Accounting
Certification of Liability Insurance		Electronic	SEDC	Accounting
CREBS	10 Years	PAPER	BOTTOM DRAWER LRG FILE CABINET TINA'S	Accounting
Helping Hands Applications		paper	Member Service Manager Office	Accounting
Helping Hands Articles of Incorporation, Bylaws, Resolutions		Electronic	G:Drive/Helping Hands & Vault #6	Accounting
Helping Hands Financials		electronic	Propane J:Drive/Quickbooks	Accounting
ICUA	5 Years	ELECTRONIC	Y:ICUA YRLY DATA	Accounting
Journal Entries	10 yrs/Plant 46 yrs	Paper	Top Shelf Tina's/Top shelf extra cubicle	Accounting
MECA	5 Years	PAPER	BOTTOM DRAWER LRG FILE CABINET TINA'S	Accounting
Monthly Close Reports		Electronic	Y:Closing Reports	Accounting
NRECA Pension Loan		Paper	Top Drawer File Cabinet Patty's old office	Accounting
OAR'S	5 Years	PAPER/ELECTRONIC	PATTY'S OLD OFFICE/SEDC	Accounting
Patronage Capital - canceled checks		paper	in Vault NW corner in files	Accounting
Patronage Capital - checks		paper	in Vault on E Wall and in file cabinet	Accounting

Record Category/Description	Retention Period	Storage Media	Location(s)	Designated Responsible Person/Records Custodian/Records Coordinator/Dept
Patronage Capital - Current applications-Cash out due to age, decedent, bad debt		paper	Cupboard behind Missi Desk	Accounting
Patronage Capital - file binders of General retirement payouts		paper	in Vault NW corner in files	Accounting
Patronage Capital - Final Applications-cashed out due to age, decedent, bad debt or moved out of area		paper	in Vault in Binders on E Wall and in file cabinets	Accounting
PNGC	5 Years	ELECTRONIC	BOTTOM DRAWER LRG FILE CABINET TINA'S	Accounting
PNGC/BPA IRRIGATION RATE DATA	5 Years	ELECTRONIC	Y:PNGC IRR RATE DATA	Accounting
Public Power Council	5 Years	Paper	Bottom Drawer LRG File Cabinet Tina's	Accounting
REGIS		Paper	BOTTOM DRAWER LRG FILE CABINET TINA'S	Accounting
Smart Grid Information		Paper	Bottom Drawer LRG File Cabinet Tina's	Accounting
Special Equipment Retirement		Paper	BOTTOM DRAWER LRG FILE CABINET TINA'S	Accounting
State Compliance Reports	5 Years	Paper/Electronic	Bottom Drawer LRG File Cabinet Tina's/Y:Year End Reports	Accounting
UNCLAIMED PROPERTY	FILING +10 YRS	PAPER	TOP DRAWER LRG FILE CABINET TINA'S	Accounting
USDA EIA-861	5 Years	ELECTRONIC	Y:EIA-861	Accounting
W-9'S ELECTRIC	Until superseded		Bottom Drawer Sm cabinet Tina's	Accounting

Record Category/Description	Retention Period	Storage Media	Location(s)	Designated Responsible Person/Records Custodian/Records Coordinator/Dept
General Corporate / Loan Agreements	Superseded + 6 yrs	Paper & Electronic	Archives K:\Contracts\Loan Agreements Vault Lateral #6 B	Admin
General Corporate / Annual Reports to Members	6 Years	Electronic	Taustin Drive: & G:\ Annual Meeting	Admin
General Corporate / Articles of Incorporation	Permanent	Paper & Electronic	Ashton Vault Lateral #6 B & G:\Board Reports\Board Orientation\Board Actions & Legal Documents\Articles of Incorporation	Admin
General Corporate / Board Packets	10 Years	Electronic	G:\Board Reports	Admin
General Corporate / By-Laws	Permanent	Paper & Electronic	Ashton Vault Lateral #6 B & G:\Board Reports\Bylaws	Admin
General Corporate / GrandTargheeLease Generator	Life of Equipment	Paper & Electronic	Vault Lateral #6 B Binder & Archives K:\Contracts	Admin
General Corporate / Member Surveys	Superseded	Electronic	G:\Board Reports	Admin
General Corporate / Mgmt Calendars	1 Year	Paper & Electronic	EA Office & Outlook Calendar	Admin
General Corporate / Mgmt General Correspondence and Memos	1 Year	Paper & Electronic	Originating Dept.	Admin
General Corporate / Minutes - Annual M.	Permanent	Paper & Electronic	Ashton Vault Lateral #7 A G:\Annual Meeting\Year\Business Meeting	Admin
General Corporate / Minutes - Board Ad-hoc Committee	15 Years	Paper & Electronic	Ashton Vault Lateral #7A & Archives K:\a Minutes History	Admin

Record Category/Description	Retention Period	Storage Media	Location(s)	Designated Responsible Person/Records Custodian/Records Coordinator/Dept
General Corporate / Minutes - Board Books	Permanent	Paper & Electronic	Ashton Vault Lateral #7A G:\Board Reports\Year & Archives K:\a Minutes History	Admin
General Corporate / Minutes - Helping Hands	Permanent	Paper & Electronic	Ashton Vault Lateral #7A G:\Board Reports\Year Archives K:\a Minutes History	Admin
General Corporate / Minutes - Standing Board Committee	Permanent	Paper & Electronic	Ashton Vault Lateral #7A G:\Board Reports	Admin
General Corporate / Policies	Superseded + 6 yrs	Paper & Electronic	Ashton Vault Lateral #6A & G:\General Policies	Admin
General Corporate / Resolutions	Permanent	Paper & Electronic	Ashton Vault Lateral #6A G:\Board Reports\Resolutions	Admin
General Corporate / Scholarships	6 years	Paper & Electronic	Ashton Vault Lateral #6B G:\Scholarships\	Admin
General Corporate / Travel Books - Files	1 year	Paper & Electronic	EA Office	Admin
Pictures		Paper & Electronic	Ashton Vault Lateral #5 Top G:\Pictures - All Drives	Admin
Presentations Materials	Superseded	Electronic	Originating Dept. or G:\Board Reports	Admin
219 Inventories 1999-2005	Permanent	Electronic and paper	z:\ and in the vault	Engineering
3S and 4S Meter Tests	Until Superseded	Electronic	g:\	Engineering
9S Meter Tests	Until Superseded	Electronic	g:\	Engineering
Alpha Correspondence Files (A-Z)		Paper	In file cabinet Engineering file room	Engineering
AS 400 Files	Permanent	Electronic	m:\	Engineering
AS 400 Work Order Sketches	Permanent	Electronic	m:\	Engineering
Billing Aid to Construction	Permanent	Electronic	z:\	Engineering

Record Category/Description	Retention Period	Storage Media	Location(s)	Designated Responsible Person/Records Custodian/Records Coordinator/Dept
Hydro		Paper	In file cabinet Engineering file room	Engineering
Hydro and Generation Files		Paper	In file cabinet Engineering file room	Engineering
Hydro Reports		Electronic	e:\Hydro	Engineering
Hyperlink Pictures/Easements	Permanent	Electronic	w:\	Engineering
Idaho State and US Government Correspondence Files	Permanent	Paper	In file cabinet Engineering file room	Engineering
Idaho State Department of Lands	Permant	Paper	In file cabinet Engineering file room	Engineering
Long Range Plans	Permanent	Paper & Electronic	In the vault-G:Board Reports	Engineering
Maintenance Plans--System and Vehicle	Until Superseded	Electronic	e:\Maintenance Plans - System&Vehicle	Engineering
Maps	Keep shape file layers until new layers are published	Electronic	m:\mapping	Engineering
Master Map List	Until Superseded	Electronic	z:\	Engineering
Meter software and drivers	Until new software and drivers are purchased	Electronic	g:\	Engineering
Meter Tests	Life of Meter	Electronic	g:\	Engineering
Osmose Pole Testing		Paper	In file cabinet Engineering file room	Engineering
Outage Reports	10 years	Paper	In file cabinet Engineering file room	Engineering
Partner Jobs in PDF	Permanent	Electronic	e:\Partner Jobs in PDF	Engineering
PNGC Billing	End of year + 6 years	Electronic	e:\PNGC Billing	Engineering
Pole Attachment Agreements and Billings	Until Superseded	Paper	In file cabinet Engineering file room	Engineering
Pole Attachments	Permanent	Electronic	e:\Pole Attachments	Engineering

Record Category/Description	Retention Period	Storage Media	Location(s)	Designated Responsible Person/Records Custodian/Records Coordinator/Dept
BLM/Forest Service/Federal Lands Permits	Permanent	Electronic and paper	z:\ drive and in the filing cabinet in the Engineering Department	Engineering
Budgets	7 years	Electronic	g:\	Engineering
Chester Files		Electronic	g:\	Engineering
Chester Hydro Diversion Project	Permanent	Electronic	g:\	Engineering
Closed Work Order Costs	7 years	Electronic	z:\	Engineering
Construction Assembly Drawings	Until Superseded	Electronic	e:\Construction Assembly Drawings	Engineering
Construction Work Plans	Permanent	Electronic and in the vault	e:\Construction Work Plans	Engineering
Disaster Recovery Plan	Until Superseded	Electronic	e:\Disaster Recovery Plan	Engineering
Drawings	Permanent	Electronic	x:\Drawings	Engineering
Easements	Permanent	Electronic	m:\	Engineering
Easements	Permanent	Paper	In file cabinet Engineering file room	Engineering
Easements Transmission Lines	Permanent	Electronic and paper	z:\ drive, w:\ drive, and in the filing cabinet in the Engineering Department	Engineering
Engineering Goals	7 years	Electronic and in the vault	e:\Engineering Goals	Engineering
Equipment Files	Permanent or until equipment is no longer in plant	Paper	In file cabinet Engineering file room	Engineering
Facilities		Electronic	e:\Facilities	Engineering
FERC		Paper	In file cabinet Engineering file room	Engineering
Fiber Project	Permanent	Electronic	e:\Fiber Project	Engineering
Forest Service and BLM Special Use Permits	Permanent	Paper	In file cabinet Engineering file room (3 ring binders)	Engineering
Futura Documentation	Until Superseded	Electronic	z:\	Engineering

Record Category/Description	Retention Period	Storage Media	Location(s)	Designated Responsible Person/Records Custodian/Records Coordinator/Dept
Pole Inspections 2005-2016	Until new year is added--then destroy old copy	Electronic	m:\	Engineering
Power Engineers Work Order Reports	7 years	Electronic	e:\Power Engineers Work Order Reports	Engineering
Power Requirement Studies	Permanent	Electronic and paper	e:\Power Requirement Studies and in the vault	Engineering
Project Files	Permanent	Paper	In file cabinet Engineering file room	Engineering
Refund Overpaid Aid	Permanent	Electronic	z:\	Engineering
Reports/Plans/Studies	Permanent	Paper and electronic	e:\Work Plans and in the vault	Engineering
Sawtelle GPS	Permanent	Electronic	m:\	Engineering
SCADA		Paper	In file cabinet Engineering file room	Engineering
Sectionalizing Studies	Permanent	Electronic and paper	e:\Sectionalizing Studies and in the vault	Engineering
SPCC	Until Superseded	Electronic	e:\SPCC	Engineering
Studies--Irrigation, Power Requirement, Sectionalizing, Construction Work Plans		Paper	In file cabinet Engineering file room	Engineering
Subdivision Plats (Originals)	Permanent	Paper	In file cabinet Engineering file room	Engineering
Subdivisions from CAD	Permanent	Electronic	m:\	Engineering
Submetering Program	Permanent	Electronic	e:\Submetering Program	Engineering
Substation Contracts	Permanent	Electronic	e:\Substation Contracts	Engineering
Substation Inspections	Permanent	Electronic	e:\Substation Inspections	Engineering
Substation Metering	Permanent	Electronic	e:\Substation Metering	Engineering
Substation Metering		Paper	In file cabinet Engineering file room	Engineering
Substations		Paper	In file cabinet Engineering file room	Engineering
Tax District Miles of Line	7 years	Electronic	z:\	Engineering

Record Category/Description	Retention Period	Storage Media	Location(s)	Designated Responsible Person/Records Custodian/Records Coordinator/Dept
Transformer History Records	Permanent	Electronic	Asset Tracker Program	Engineering
Transmission Contract Documents	Permanent	Electronic	e:\Transmission Contract Documents	Engineering
Transmission Maintenance Plan	Until Superseded	Electronic	e:\Transmission Maintenance Plan	Engineering
TransmissionLines_BPA_Fall River	Until Superseded	Electronic	w:\	Engineering
USGS Quad Maps	Permanent	Paper	In file cabinet Engineering file room	Engineering
Work Order Inventories	Permanent	Paper	In the vault	Engineering
Work Order Original Estimates	Permanent	Electronic	e:\Work Order Estimates	Engineering
Work Orders	Permanent	Paper and electronic	SEDC and in the vault	Engineering
Current Employee Medical file	HIPPA reg 6 years	Paper and electronic	Z:Drive, HR V:drive, BambooHR, Vault FileCab#10	HR
Current Employee Retirement programs file	Permanent	Paper	Vault FileCab#10-11	HR
Current Personnel files	term + 5 yrs should be compensation rec 4 yrs.	Paper	Vault FileCab#10-11	HR
Federated Insurance Claims filed	Liability claims settlement date +6 years	Paper	Vault FileCab#10-11 and Z:Drive	HR
I-9's	3 Years or 1 Year after Term	Paper	Vault FileCab#10	HR
Job Applicant File	2 years after decision is made	Paper		HR
Law Suit Information	Permanent	Paper	Tall Credenza HR Office	HR
Old Retirement Plan Docs	Permanent	Paper	Vault FileCab#10	HR
OSHA Logs	Term + 30 Years	Paper	Vault FileCab#11	HR

Record Category/Description	Retention Period	Storage Media	Location(s)	Designated Responsible Person/Records Custodian/Records Coordinator/Dept
Terminated Personnel files	SHRM rec. term + 4 yrs	Paper	Vault FileCab#10	HR
Union History	Expiration + 6 Years	Paper	Vault FileCab#11	HR
Batch Payment Enve		Paper	Vault-#23 Open Shelves	Member Services
Daily Balancing and Month End		Paper	Vault	Member Services
Irrigation Studies	Permanent	Paper & Electronic	Vault #12 & G:\Conservation	Member Services
Marathon Water Heaters-sales	Life Time Warrantee	paper	Vault-#8	Member Services
NSF		paper	Receptionist Drawer	Member Services
Accident Reports	Permanent	Electronic	OPS Drive	Operations
Billing for Damages Caused by the Public	Permanent	Electronic	OPS Drive	Operations
Damage Assessment Records		Electronic	Futura Damage Assessment Access GIS	Operations
DOT CDL Qualification Records	After Terminated + 3 years	Electronic	Driver Management Program https://www.drivermanagement.com	Operations
Equipment Rental Agreements		Paper	Ops. Manager cabinet	Operations
Forest Service Vegetative Plan Agreement	Life of contract/agreement + 6 years	Electronic	Opr:\Tree Trimming\Forest Service	Operations
OSHA (Forms 300, 300A, 301)	current + 5 Years	Paper & Electronic	W:\Safety Master File\OSHA	Operations
Outage Reports	6 years	Electronic	Report IQ	Operations
PCB ANNUAL RECORDS	3 years + current	Electronic	PCB C:\Program Files\PCBMAN~1	Operations
PCB Test Records	3 years + current	Paper & Electronic	Ops drive and Cabinet in the Managers office	Operations
Rubber Goods Inspections-Gloves/Blankets	Current	Paper	Binder in Opr Managers Cabinet	Operations

Record Category/Description	Retention Period	Storage Media	Location(s)	Designated Responsible Person/Records Custodian/Records Coordinator/Dept
Safety Compliance Minutes/Procedure	Permanent	Electronic	W:\Safety Master File\safety compliance committee	Operations
Safety Incentive Minutes/Procedure	Permanent	Electronic	W:\Safety Master File\SAFETY INCENTIVE COM	Operations
Safety Manual- MECA	Current	BOOKLET		Operations
Safety Meeting Minutes and Schedules	Permeant	Electronic	W:\Safety Master File\MINUTES-AGENDAS	Operations
Safety Report to Mgmt	Permanent	Electronic	W:\Safety Master File\Board Reports	Operations
Tail Boards	6 mo. after work completion	Paper	https://www.osha.gov/SLTC/etools/electric_power/personal_protective_equipment.html	Operations
Thermographic Reports	until maintenance work is complete then 6 years	Paper	Ops. Manager Cabinet	Operations
Tool Inspection Reports - Hot sticks	Current	Paper	Binder in OPS Manager Office	Operations
Tree Trimming Records		Electronic	W:\Tree Trimming	Operations
Vehicle- Annual Truck Inspections	Until Superseded	Paper & Electronic	W:\TRUCK INSPECTIONS & Operations Manager Office	Operations
Vehicle Heavy Use Tax	Current + 4 Years	Paper	Suzelle's File Cabinet	Operations
Vehicle IFTA Reporting	Current + 4 Years	Paper & Electronic	Ops Drive and Cabinet in the vault	Operations
Vehicle Maintenance Schedule/Fleet Management	2 years after disposed then destroy.		SEDC	Operations
Vehicle Mileage Reports	Current + 3 years	Paper	Cabinet in the vault	Operations
Vehicle Registrations	Current + 3 Years	Paper and Electronic	Ops Drive & Suzelle's File Cabinet	Operations

Employee Plan in Response to COVID-19 Virus
Last updated 08/12/2022

On 12 August 2022, the CEO reviewed for any changes to 5 July 2022 guidance to identify any modifications for compliance.

On 11 August 2022, the CDC released new guidance that persons need not quarantine themselves if they come into close contact with infected person or persons although school scenarios were still being reviewed.

As of 5 July 2022, No changes on the NYS or CDC guidance were identified although NYS strongly recommends first and second booster doses.

March 30, 2022 is the latest guidance from CDC and NYSDOH which supersedes the February 8, 2022 guidance noted as, "A minor clarification was made regarding activities after isolation ends, and the section for schools and childcare programs has been substantially updated".

On February 10, 2022, The DOL weighed in stating **employees will wear appropriate face coverings in accordance with guidance from State Department of Health or the Centers for Disease Control and Prevention, as applicable.** Consistent with the guidance from the State Department of Health, if indoor areas do not have a mask or vaccine requirement as a condition of entry, **appropriate face coverings are recommended, but not required.** It is also **recommended that face coverings be worn by unvaccinated individuals, including those with medical exemptions, in accordance with federal CDC guidance.** Further, the State's masking requirements continue to be in effect for pre K to grade 12 schools, public transit, homeless shelters, domestic violence shelters, prisons, nursing homes, health care, childcare, group homes, and other sensitive settings in accordance with CDC guidelines. New York State and the State Department of Health continue to strongly recommend face coverings in all public indoor settings as an added layer of protection, even when not required.

People with Known Exposure to COVID-19 Who Do Not Have Symptoms¹

"Quarantine"

	Under age 2 years or unable to wear a well-fitting mask	Age 2 - 4 years	Age 5 - 11 years		Age 12 years - Adult				All ages
			Up-to-Date Fully Vaccinated	Not yet Fully Vaccinated	Up-to-Date Fully Vaccinated and Boosted	Up-to-Date Fully Vaccinated, not yet eligible for booster	Fully Vaccinated, eligible for booster but not yet boosted	Not yet Fully Vaccinated	
Quarantine, Duration	Yes, 10 days (masks not recommended for children under age 2)	Yes, 5 days	No	Yes, 5 days	No	No	Yes, 5 days	Yes, 5 days	No
Attend/work at school and eligible child care programs, (includes transportation)	N/A	Yes, if undergoing recommended testing.	Yes	Yes, if undergoing recommended testing.	Yes	Yes	Yes, if undergoing recommended testing.	Yes, if undergoing recommended testing.	Yes
Testing	Test on whichever comes first: at least 5 days after last exposure (testing recommended but optional if unable to test) or if Symptoms develop If positive, isolate for at least 5 days from symptom onset or (if no symptoms) date test was collected								No test needed. Test if Symptoms develop.

1. See specific guidance for individuals in congregate settings and for furlough for healthcare workers.

March 1, 2022

Isolation for the General Public²

"Isolation" is for people who have a positive COVID-19 test or who have symptoms and are waiting for the results of a COVID-19 test.

Isolation is the same for everyone, regardless of whether they are unvaccinated, vaccinated, or boosted.

	Symptoms, Waiting for Test Result	No Symptoms, Positive Test	Symptoms , Positive Test	Hospitalized for COVID-19 or Immunocompromised
Duration of Isolation	Until test result is received or 5 days, whichever is first. If test result is negative, isolation can end. If test result is positive, see "Symptoms, Positive Test" column.	5 days (day 0 is the day the test was collected; isolation ends <u>after</u> day 5). 10 days if unable to wear a well-fitting mask If symptoms develop after testing positive, start 5-day count again with day 0 being the day symptoms started.	Minimum of 5 days (day 0 is the day symptoms start; isolation ends <u>after</u> day 5). <u>and</u> when fever-free for 24 hours without fever-reducing medication <u>and</u> symptoms have improved 10 days if unable to wear a well-fitting mask	10 - 20 days, consult healthcare provider
Antigen Test Timing at the End of Isolation	N/A	Optional. If testing is done, it should be on at least day 5 of isolation. If positive, isolate through day 10. If negative, isolation can end but continue to wear a mask through day 10.	Optional. If testing is done, it should be on at least day 5 of isolation (when fever free for 24 hours and symptoms have improved). If positive, isolate through day 10. If negative, isolation can end but continue to wear a mask through day 10.	Consult healthcare provider

2. See specific guidance for individuals in congregate settings and for furlough for healthcare workers.

March 1, 2022



The revised guidance in full written (non-tabular) form can be found at https://coronavirus.health.ny.gov/system/files/documents/2022/03/quarantine-and-isolation-guidance_03.01.22.pdf

Self-attestation forms, can be found here: <https://coronavirus.health.ny.gov/new-york-state-contact-tracing>

As of February 11, 2022, an employee is limited receiving NY COVID-19 up to 40 hours.

Purpose of the Employee Plans

These plans will be reviewed again on April 7, 2022, or sooner as warranted.

These plans are intended to minimize transmission of the COVID-19 virus between employees, so that employees and those they come into contact with outside the workplace are safer. The plans have been updated as part of the AIDEPP. The Cooperative is obligated to uphold any and all NYS and Federal laws and follow current CDC guidelines. As more is learned about the virus, these guidelines are subject to change.

This plan allows us to continue to serve the most critical needs of members, including answering the phone and responding to outages. Also, critical office functions like payroll processing will be maintained under this plan.

This plan also outlines procedures in the event that employees have extended time away from the office due to a COVID related illness.

Furlough

There is no plan to utilize employee furlough based on the current region's ranking put forth by the Governor's office. If there is a new executive order or state of emergency, then employee furlough will be reconsidered. Individual Furlough (Quarantine) is considered in the event that an employee may have been exposed to the virus. In such cases, employees may be entitled to paid leave.

Maintaining Social Distance

Social distancing is absolutely required to limit possible exposure and subsequent contamination, in the event another employee may be a-symptomatic and be positive for the virus.

Required Precautions

Before Work:

Effective September 10, all employees must perform screening prior to start of any shift.

The following three screening questions are required daily:

- 1. Are you presently running a fever (100.4 F)?**
- 2. Are you currently experiencing, or recently experienced (in the last 48 hours), any new or worsening COVID-19 symptoms?**
- 3. Have you had close contact (being within six feet for at least 15 minutes over a 24-hour period) or proximate contact (as determined by health authorities) in the past 10 days with any person confirmed by diagnostic test, or suspected based on symptoms, to have COVID-19?**

4. Have you tested positive through a diagnostic test for COVID-19 in the past 10 days?

Updated forward guidance no longer makes exceptions for vaccination or recovery status regarding close contact and exposure. Exposure is defined as 15 cumulative minutes of mask-less close proximity (less than 6' proper social distancing) to an individual during a rolling 24-hour period.

While at work, the following precautions shall be taken by all employees:

- 1) Attempt to maintain a distance of 6 feet between employees whenever practical.
- 2) If practical, utilize your badge rather than your finger/thumb print to punch in and out with the time clock.
- 3) Whenever practical, clean and disinfect shared surfaces by utilizing disinfect wipes and cleaners provided by the Cooperative. Shared surfaces include time clocks, bathroom fixtures, door handles, steering wheels of shared vehicles, gas pumps, etc.
- 4) Wash hands thoroughly as often as possible and after contact with surfaces that may not be sanitized. Avoid touching your face with your hands.
- 5) Utilize hand sanitizer when unable to wash hands after touching surfaces that may not be disinfected. The Cooperative has provided sanitizers in all areas of the office, and disposable sanitizing wipes and liquid are available for all trucks and offices.
- 6) Sanitize all trucks before and after using.
- 7) When vehicles are shared, employees not fully vaccinated within the shared vehicle must wear face coverings.

Face Masks

Facemasks are recommended in certain situations as outlined in the tables on page 2 of this document.

For this reason, the Cooperative has provided all employees and guests with disposable face masks. FR face masks have been supplied to those who work in and near the energized space. Please let us know if you need FR masks or any other PPE.

Suspected COVID-19 Exposure Procedure

All employees are required to notify their immediate supervisor and departmental manager if they suspect or are notified that there was a possible exposure to the virus. In some cases, the possible exposure to the virus may be remote, but it still needs to be reported as soon as you have knowledge of the possible exposure.

Who does Not Have to Quarantine After Close Contact with Someone With COVID-19?

- Anyone who is up to date on their COVID-19 vaccinations:
 - o Anyone ages 12 or older and who has received all CDC recommended COVID19 vaccine doses, including boosters if eligible and additional primary shots for some immunocompromised people.
 - o Anyone ages 5-11 years old who has completed the primary series of COVID19

vaccines, including additional primary shots for some immunocompromised people.

- Anyone who has had confirmed COVID-19 within the last 90 days (tested positive using a viral test, e.g. antigen or PCR).

What To Do if Not Subject to Quarantine:

- Wear a well-fitting mask around others for 10 days from the date of last close contact with someone with COVID-19 (the date of last close contact is considered day 0).
- Get tested at least 5 days after the date of last close contact with someone with COVID 19. If test is positive or COVID-19 symptoms develop, isolate from other people and follow recommendations in the Isolation section of this guidance document.
- Anyone who had COVID-19 within the last 90 days and has since recovered and remained symptom free, does not need to get tested after close contact with someone with COVID-19.
- If an exposed person who does not have to quarantine cannot separate from one or more individuals with COVID-19 who are in isolation (e.g., because the exposed person lives in the same household with a sick individual who needs care), then the exposed person will have ongoing exposure until the infected person is no longer contagious. See detailed testing and mask recommendations in the “Ongoing COVID-19 Exposure FAQs” section of CDC's quarantine and isolation page.
- If an exposed person who does not have to quarantine travels during the 10 days after last close contact, the person should wear a well-fitting mask when around others for the entire duration of travel during the 10 days. Anyone unable to wear a mask should not travel during the 10 days. Travelers should get tested at least 5 days after the date of the last close contact, receive a negative test result before travel or further travel, and be symptom free.

Who Must Quarantine After Close Contact with Someone with COVID-19?

- Anyone who is not up to date on their COVID-19 vaccinations.
 - o Anyone who is not vaccinated or has not completed a primary vaccine series.
- See exceptions for school and childcare below.
- o Anyone ages 12 or older who has completed the primary series of recommended vaccine, and is eligible for a CDC recommended booster shot, but has not received it.
- See exceptions for school and childcare below.

How to Quarantine

- Stay home and away from other people for at least 5 days (day 0 through day 5) after the date of the last contact with a person who has COVID-19. The date of contact (exposure) is considered day 0.
- Wear a well-fitting mask when around others at home, if possible.
- For 10 days after the date of the last close contact with someone with COVID-19, watch for fever (100.4°F or greater), cough, shortness of breath, or other COVID-19 symptoms
- If symptoms develop, get tested immediately and isolate until test results arrive. If test result is positive, follow recommendations in the Isolation section of this guidance document.
- If symptoms do not develop, get tested at least 5 days after the date of last close contact with someone with COVID-19. o If test results are negative, quarantine can end, but continue to wear

a well-fitting mask when around others at home and in public until 10 days after the date of the last close contact with someone with COVID-19.

- o If test results are positive, isolate for at least 5 days from the date of the positive test (date of test, not date results received).
- o Quarantined individuals should make every effort to get tested at least 5 days after exposure, even if asymptomatic. If it is not possible to get a test 5 days after the last close contact with someone with COVID-19, quarantine can end after day 5 if there have been NO COVID-19 symptoms throughout the 5-day period. Continue to wear a well-fitting mask when around others at home and in public until 10 days after the date of the last close contact with someone with COVID-19.
- o Avoid people who are immunocompromised or at high risk for severe disease, and nursing homes and other high-risk settings, until after at least 10 days.
- If possible, stay away from people in the home, especially people who are at higher risk for getting very sick from COVID-19, as well as others outside the home throughout the full 10 days after the date of the last close contact with someone with COVID-19.
- If a quarantined person cannot separate from one or more individuals with COVID-19 who are in isolation (e.g., because the quarantined person lives in the same household with a sick individual who needs care), then the quarantined person will have ongoing exposure until the infected person is no longer contagious. In this situation, quarantine for the uninfected person continues throughout the isolation period of the individual(s) with COVID-19 and 5 days beyond the last day the infected individual(s) are on isolation. See detailed recommendations in the “Ongoing COVID-19 Exposure FAQs” section of CDC's quarantine and isolation page.
- All children under the age of 2 years, who are not recommended to wear masks, as well as others who cannot wear a well-fitting mask for any reason should continue to quarantine for 10 days. During this time, avoid people who are immunocompromised or at high risk for severe disease, or living in nursing homes and other high-risk settings.
- Do not travel during the 5-day quarantine period. Before resuming travel, get tested at least 5 days after the date of the last close contact with someone with COVID-19, receive a negative test result, and be symptom free for all 5 days of quarantine. If it is not possible to get a test, delay travel until 10 days after the date of the last close contact with a person with COVID-19. It is best to avoid travel for 10 days after last date of close contact. If travel must occur before the 10 days are completed, continue to wear a well-fitting mask when around others for the entire duration of travel during the 10 days. Anyone unable to wear a mask should not travel during the 10 days.
- Do not go to places where activities prevent mask-wearing, such as restaurants, and avoid eating around others at home and at work until after 10 days after the date of the last close contact with someone with COVID-19. After Quarantine
- Watch for symptoms until 10 days after the date of the last close contact with someone with COVID-19. • If symptoms develop, isolate immediately and get tested.

COVID-19 Infection Procedure

All employees are required to notify their immediate supervisor and department manager if they exhibit symptoms of having contracted the COVID-19 virus after a known exposure.

Isolation is used to separate people with confirmed or suspected COVID-19 from those without

COVID-19.

Who Has to Isolate?

People who are confirmed to have COVID-19 or are showing symptoms of COVID-19 need to isolate regardless of their vaccination status. This includes:

- People who have a positive viral test (e.g. antigen or PCR) for COVID-19, regardless of whether or not they have symptoms.
- People with symptoms of COVID-19, including people who are awaiting test results or have not been tested. People with symptoms should isolate even if they do not know if they have been in close contact with someone with COVID-19.

How to Isolate

- Stay home, in a separate room from other household members, if possible, for at least 5 full days (day 0 is the first day of symptoms or the date of the day of the positive test for asymptomatic persons).
- Use a separate bathroom if available.
- Wear a well-fitting mask when it is not possible to be separate from others in the home.
- Monitor your symptoms. If you have an emergency warning sign (including trouble breathing), seek emergency medical care immediately.
- Take steps to improve ventilation at home, if possible.
- Avoid contact with other members of the household and pets.
- Don't share personal household items, like cups, towels, and utensils.

Ending Isolation

For people who had symptoms but were not hospitalized for COVID-19

- Isolation ends after 5 full days if the individual is fever-free for 24 hours without the use of fever-reducing medication and other symptoms have improved (Loss of taste and smell may persist for weeks or months after recovery and need not delay the end of isolation).
- Continue to wear a well-fitting mask around others at home and in public for 5 additional days (day 6 through day 10) after the end of the 5-day isolation period.
- All children under the age of 2 years, who are not recommended to wear masks, as well as others who cannot wear a well-fitting mask for any reason, must isolate for a full 10 days. Avoid people who are immunocompromised or at high risk for severe disease, and nursing homes and other high-risk settings, until after at least 10 days.
- If fever continues or other symptoms have not improved after 5 days of isolation, continue to isolate until there is no fever for 24 hours without the use of fever-reducing medication and other symptoms have improved. Continue to wear a well-fitting mask when around others in the home. Consider contacting a healthcare provider.
- Do not travel during the 10 days after the first day of symptoms.
- Do not go to places where wear a mask cannot be worn, such as restaurants, and avoid eating around others at home and at work until after 10 days after the date of the last close contact with someone with COVID-19.

Testing to end isolation is not required. If an individual has access to a test and wants to test, the best approach is to use an antigen test towards the end of the 5-day isolation period if fever-free for 24 hours without the use of fever-reducing medication and other symptoms have

improved (loss of taste and smell may persist for weeks or months after recovery and need not delay the end of isolation).

If test result is positive, continue to isolate until day 10.

If test result is negative, isolation can end, but continue to wear a well-fitting mask around others at home and in public until day 10. Follow additional recommendations for masking and restricting travel as described above.

For people who did not have symptoms

- Isolate for at least 5 days. Day 0 is the day of the positive test and day 1 is the first full day after the specimen was collected for your positive test.
- Isolation ends after 5 full days if no symptoms develop.
- Continue to wear a well-fitting mask around others at home and in public until day 10 (day 6 through day 10).
- All children under the age of 2 years, who are not recommended to wear masks, as well as others who cannot wear a well-fitting mask for any reason, must isolate for a full 10 days. Avoid people who are immunocompromised or at high risk for severe disease, and nursing homes and other high-risk settings, until after at least 10 days.
- If symptoms develop after testing positive, the 5-day isolation period should start over. Day 0 is the first day of symptoms. Follow the recommendations above for ending isolation for people who had COVID-19 and had symptoms.
- Do not travel during the 10 days after the positive test.
- Do not go to places where activities prevent mask-wear, such as restaurants, and avoid eating around others at home and at work until after 10 days after the date of the last close contact with someone with COVID-19.

Testing to end isolation is not required. If an individual has access to a test and wants to test, the best approach is to use an antigen test towards the end of the 5-day isolation period. If test result is positive, continue to isolate until day 10. If test result is negative, isolation can end, but continue to wear a well-fitting mask around others at home and in public until day 10. Follow additional recommendations for masking and restricting travel as described above.

For people who are hospitalized for COVID-19 or are immunocompromised

People who are hospitalized for COVID-19 and people with compromised immune systems might need to isolate longer. They may also require testing with a viral test (e.g. antigen or PCR) to determine when they can be around others. CDC recommends an isolation period of at least 10 and up to 20 days for people who were severely ill with COVID-19 and for people with weakened immune systems. Consult with a healthcare provider about ending isolation.

People who are immunocompromised should talk to their healthcare provider about the potential for reduced immune responses to COVID-19 vaccines and the need to continue to follow current prevention measures (including wearing a well-fitting mask, staying 6 feet apart from others they don't live with, and avoiding crowds and poorly ventilated indoor spaces) to protect themselves against COVID-19 until advised otherwise by their healthcare provider. Close contacts of immunocompromised people – including household members – should also be encouraged to receive all recommended COVID-19 vaccine doses to help protect these people.

As a utility, DCEC is classified as essential services. The original 12/23/21 CDC and 12/24/21 NYSDOH guidance has also been modified as of 1/21/22 CDC new guidance for dealing with varying degrees of labor shortage.

Work Restrictions for HCP With SARS-CoV-2 Infection and Exposures

"Up to Date" with all recommended COVID-19 vaccine doses is defined in [Stay Up to Date with Your Vaccines | CDC](#)

For more details, including recommendations for healthcare personnel who are immunocompromised, have severe to critical illness, or are within 90 days of prior infection, refer to [Interim Guidance for Managing Healthcare Personnel with SARS-CoV-2 Infection or Exposure to SARS-CoV-2](#) (conventional standards) and [Strategies to Mitigate Healthcare Personnel Staffing Shortages](#) (contingency and crisis standards).

Work Restrictions for HCP With SARS-CoV-2 Infection

Vaccination Status	Conventional	Contingency	Crisis
Up to Date and Not Up to Date	10 days OR 7 days with negative test [†] , if asymptomatic or mild to moderate illness (with improving symptoms)	5 days with/without negative test, if asymptomatic or mild to moderate illness (with improving symptoms)	No work restriction, with prioritization considerations (e.g., types of patients they care for)

Work Restrictions for Asymptomatic HCP with SARS-CoV-2 Exposures

Vaccination Status	Conventional	Contingency	Crisis
Up to Date	No work restrictions, with negative test on days 1 [‡] and 5–7	No work restriction	No work restriction
Not Up to Date	10 days OR 7 days with negative test [†]	No work restriction with negative tests on days 1 [‡] , 2, 3, & 5–7 (if shortage of tests prioritize Day 1 to 2 and 5–7)	No work restrictions (test if possible)

[†]Negative test result within 48 hours before returning to work

[‡]For calculating day of test: 1) for those with infection consider day of symptom onset (or first positive test if asymptomatic) as day 0; 2) for those with exposure consider day of exposure as day 0



COVID-19 | 01/27/2022

cdc.gov/coronavirus

Employers may allow a person to return to work after day 5 of their isolation period (where day zero is defined as either date of symptom onset if symptomatic, or date of collection of first positive test if asymptomatic) if they meet all the following criteria:

- The individual is a healthcare worker or other critical workforce member
- The individual is fully vaccinated at least 2 weeks before the day they become symptomatic or, if asymptomatic, the day of collection of the first positive specimen).
- The individual is asymptomatic, or, if they had mild symptoms, when they return to work they must:

Not have a fever for at least 72 hours without fever-reducing medication

Have resolution of symptoms or, if still with residual symptoms, then all are improving

Not have rhinorrhea (runny nose)

Have no more than minimal, non-productive cough (i.e., not disruptive to work and does not stop the person from wearing their mask continuously, not coughing up phlegm)

- The individual is able to wear a well-fitting face mask consistently and correctly, a higher-level mask such as a KN95, or a fit-tested N95 respirator while at work. The mask should fit with no air gaps around the edges.

In other settings, face masks should be well-fitting, disposable, non-woven masks.

Other face coverings including cloth masks are not allowed except as part of double masking with a disposable mask underneath



Individuals who are moderately to severely immunocompromised are not eligible to return to work under this guidance.

Individuals working under this policy must continue to stay at home, take precautions to avoid household transmission, and observe other required elements of isolation while not at work until the end of the 10-day period.

Testing is not required.

Workers participating in this program should be instructed that:

- They should practice social distancing from coworkers at all times except when job duties do not permit such distancing.
- If they must remove their respirator or well-fitting facemask, for example, in order to eat or drink, they should separate themselves from others.

They should self-monitor for symptoms and seek re-evaluation from occupational health or their personal healthcare provider if symptoms recur or worsen.

Contingency Designation:

Infected:

All employees who are fully vaccinated, regardless of booster status, may follow the NYSDOH Shortened Isolation protocol described in the “General Population” section (five days of isolation, may return after day five if asymptomatic/mildly symptomatic, and wear a well-fitting mask for another five days when around others).

All employees who are not fully vaccinated must follow the CDC Conventional Guidelines for Quarantine (10 days, or seven days with a negative test).

Exposed:

Employees who are fully vaccinated and fully boosted have no work restrictions after an exposure.

Employees who are fully vaccinated but not boosted, or are not fully vaccinated, also have no work restrictions after an exposure, but must test on days one, two, three and between days five and seven.

Crisis Designation:

Infected:

Facilities which designate a crisis strategy plan must contact the NYSDOH and follow the CDC Crisis Strategies, which allow infected healthcare workers to still return to work during their quarantine period dependent on a variety of factors, as a last resort.

Exposed:

Employees who are fully vaccinated and fully boosted have no work restrictions after an exposure.

Employees who are fully vaccinated but not fully boosted, or employees who are not fully vaccinated also do not have any work restrictions, but are expected to test whenever possible, and follow all other standard protocols such as mask wearing and reporting any symptoms prior to starting work. If a healthcare entity who is in crisis designation is unable to test this group of employees, it must report such to the NYSDOH.

Leave Program:



Employees will receive up to an additional 40 hours of paid leave during 2022 with portions thereof applied to restore sick/PTO hours taken between symptom onset and positive test results. Unused COVID hours are not paid out at year-end nor are they donatable or carry over into future years.

To qualify for additional COVID time, an employee must submit verification of a laboratory-tested positive result to their department manager (Ryan or Mark)

Employees must comply with the Cooperative's existing leave policies.

If an employee does not have or exhausts all sick time, they may utilize the sick leave donation program outlined in the union contract, if eligible.

Employees wishing to apply for PFL/DBL should contact Human Resources or Guardian insurance as soon as possible to receive appropriate forms. This same procedure and leave would apply if the same individual tests positive for COVID-19 subsequent times.

Employees can also apply for NYS DBL/PFLA through our insurance carrier, Guardian, for an additional paid leave by the insurance carrier per positive test.

If the employee is still unable to return to work after having exhausted all sick time then other PTO, the employee will be transitioned to short term disability for a maximum of 26 weeks. If the employee cannot return to work after 26 weeks being on short term disability and is still unable to return to work, the employee will be transitioned to long term disability.

Employees that are in their probationary period and therefore, do not have any PTO, are eligible to apply for NYS statutory short-term disability but not the enhanced short term disability benefits provided by the Cooperative. Any days beyond the NYS statutory short-term disability, will be taken as unpaid leave.

The Cooperative is considered to employ essential employees, and as such, reserves the right to evaluate and consult with each individual employee on a case-by-case basis to arrive at a mutual course of action for each scenario.

Collective Bargaining Agreements

It is not the intention of the Cooperative's management to violate any collective bargaining agreement in implementing these emergency measures. If an issue arises with respect to contractual terms or conditions of employment, management is committed to sitting down with union representatives as soon as practical to work in good faith to address any issues.

This plan is being sent to IBEW Local 10 for their informational purposes. Management will be open to discuss any issues that may be identified by the Union. In the meantime, the plan will be implemented out of concern for our employees and members of the public.

REVISION DATES:



01/20/21, 03/17/21, 04/20/21, 05/24/21, 06/11/21, 07/06/21, 08/04/21 09/06/21, 10/08/21,
10/29/21, 11/29/21, 12/10/21, 01/03/22, 01/18/22, 02/09/22, 02/10/22, 02/11/22, 03/14/22,
04/11/22, 05/10/22, 06/08/22, 07/05/22, 08/12/22

CEO REPORT
16 JULY 2022 – 15 AUGUST 2022

SAFETY/COMPLIANCE

Safety Committee Activity:

No activity this period.

Injury Report:

Two injuries reported during this period.

COVID/AIDEPP:

Updated on 12 August to reflect CDC guidance no longer requiring quarantine after exposure in certain instances. There were three cases reported during the period and the appropriate 5-day-away and area disinfection protocols were performed

Pole Inspections / Line Inspections / Stray Voltage Testing:

Bob Coager continuing on Delhi Point A.

FINANCE, ACCOUNTING & HR

Staffing:

Janelle Linehan joins the Team as Cooperative Services Administrator on 15 August.

Interviews conducted for Line Apprentice(s)

Have received a couple resumes for General Clerk. It may be more appropriate to have two Billing Assistants instead based upon feedback from the previous General Clerk and given the inherent issues with a small staff although the CSA will be eventually trained to be further backup for the front office.

CFC

The Cost-of-Service Study (CoSS) is underway. At this time, Kerry Rollins will be the assigned rate analyst. Tentative schedule as follows:

- 30 August 2022: CFC Completion Target.

RUS Audit: RUS completed their loan review/audit (LFAR) and found no issues.

OPERATIONS:

Notable Outages and Occurrences:

DCEC had planned outages for Jefferson on 19 July and for Delhi on 27 July.

On 2 August, a cement truck stalled telco resulting in 2 broken poles and an outage in Masonville (from BOCES to Oquaga)

Pole Inspections / Line Inspections / Stray Voltage Testing:

Work proceeding in Jefferson. Targeting ~1400 poles for 2022 inspections as well as get back on track with stray voltage measurements. Contractor has completed 357 stray voltage measurements in Jefferson, and Gilboa.

Right of Way Crew:

Asplundh is on property.

MEMBER SERVICES & PUBLIC RELATIONS

Annual Meeting:

9/9/22 – Details to be determined.

- Meetings with Jessica Vecchione for recording and providing support for electronic voting initiative
- Facebook campaign underway (Jess Vecchione/Amber Gray)
- Venue finalized.... Will be at Delaware Academy
- Chicken dinners... up to two free RSVP dinners per registered membership attending served after meeting.
- \$10 November 2022 bill credits for each electronic, in-person or absentee ballot
- Ten \$50 bill credits as door prizes
- Pen and pocket calendar giveaways as well drop-shipped home efficiency kit per vote

Disconnections:

Eleven disconnections this month

Website/Social Media:

Migration of website from Touchstone's Coop Web Builder 2.0 to CWB 3.0 platform proceeding with an August timeframe.

ENGINEERING & TECHNOLOGY:

Special Projects:

Cat Hollow TS-1 metering – waiting on NYSEG relocation in order to move metering point to road and install newer metering equipment

Power Quality Review:

Working with Operations to perform maintenance and patrol as well as reached out to NYSEG on voltage to Dryden station in continued monitoring of BOCES

WO Inspection:

Waiting for new Engineering Manager

Work Plan:

Internally, Engineering and Operations are reviewing project list from last work plan to re-evaluate and re-prioritize in conjunction with new projects and requirements identified with new modeling analysis.

LEGAL, GOVERNANCE & LEGISLATIVE/INDUSTRY AFFAIRS

DCEC Policies/Procedures Development:

Continuing three-year rotation of all DCEC policies.

NYAPP:

Group continues to discuss potential grants and funding opportunities although it appears many initiatives are stalled until after elections. However, in the meantime, talks continue to develop NYAPP/NYPA partnerships as IJIA money should flow into NYS directly.

NYAPP sent comments and talking points on the Climate Action Council's Draft Scoping Plan

Other activities include letters to PSC, NYISO, FERC on transmission projects and cost shares. The NY transmission owners' official stance as filed with FERC was, "Even if NYAPP's members in the upstate region are currently served by sources of renewable generation, those members do not have exclusive rights to the prospective benefits of that generation's output or a right to free ride on further transmission investment necessary for full realization of the CLCPA targets and associated benefits. ... The renewable generation developed to meet CLCPA goals is a true commons, and NYAPP's attempts to secure a vast swath of that commons for its members runs counter to the CLCPA."

PSC:

New legislation slowing but needs to be continually monitored.

NEPPA:

DCEC officially joined the Northeast Public Power Association (NEPPA) as an associate member which affords potential additional opportunities with access to training, education, mutual aid and job recruiting which was previously lacking with other associations and contracted vendors. We should wait one year to see if membership is of any benefit prior to officially including them to Organizations Policy and continue membership.

NYSRECA:

Working on draft letter to NYSEG in regard to continued reliability and communication issues

NYPA:

Anticipates no reduction in firm hydro sales next month.

DCEC Member Robert Dee is continuing to complain to NYPA in regard to compensation for his DG output