

DISTRICT POLICIES OVERVIEW

The Board of Directors of Nebraska Public Power District (NPPD) has adopted and approved policies that govern and provide guidance over the operations and functions of NPPD. These policies provide high level direction for staff and provide the basis for developing detailed standards and procedures in support of NPPD decisions and operations. This document lists each policy with a summary statement regarding the purpose of the subject policy and provides a hyperlink to the specific policy.

[Asset Management](#)

This policy focuses on physical infrastructure assets. NPPD is committed to the application of sound asset management principles. The overall purpose of asset management is to promote programs, standards, and procedures that optimize the balance between asset availability and cost.

[Corporate Nuclear Governance and Oversight](#)

This policy defines and communicates the governance and oversight responsibilities of NPPD in the pursuit of excellence for the safe and reliable operation, maintenance, and support of Cooper Nuclear Station (CNS).

[Energy Market Risk Management](#)

This policy deals with the philosophy and delegation of authorities necessary to govern activities related to NPPD's Energy Risk Management Program. NPPD will conduct its Energy Risk Management activities in a manner that supports the objectives stated in the policy and comply with all applicable regulations.

[Environmental](#)

This policy provides the general environmental policy statement and guiding environmental principles for NPPD. NPPD is dedicated to protecting environmental quality while meeting the energy needs of Nebraska. NPPD will be managed and operated in a manner that reflects our commitment to environmental compliance and stewardship.

[Electric Reliability Compliance Program](#)

This policy covers the Electric Reliability Compliance Program which implements the necessary requirements for NPPD to achieve the goal of reliable operation and compliance. NPPD is committed to providing reliable operation of the bulk power system

and complying with all applicable federal laws, regulations, and Federal Energy Regulatory Commission (FERC) reliability standards.

[Enterprise Risk Management](#)

This policy provides a framework to identify, assess, manage, and report strategic risks. The scope includes the identification of roles, responsibilities, and actions required to meet the requirements of the policy.

[Ethics](#)

This policy provides the expectations and guidelines that govern employee practices and behaviors that instill ratepayer confidence in NPPD and its employees. It is important that customers and the public have confidence and trust in NPPD and the employees performing NPPD activities. Employees must have the highest standard of personal integrity and carry out their responsibilities in a manner that portrays ethical business practices and behavior.

[Financial Management](#)

This policy states that NPPD will demonstrate financial integrity and fiscal responsibility in the management of the District's business and its assets. Employees must abide by all applicable District by-laws, Board resolutions, bond resolutions, federal and state laws, and other relevant legal requirements and District policies regarding the financial management of NPPD.

[Human Resources](#)

This policy applies to all NPPD employee-related programs and practices and the individuals who are responsible for implementing and/or are affected by the programs and practices. NPPD is committed to maintaining a motivating work environment for its employees through the development and implementation of fair, competitive, consistent, and legally compliant employee-related programs and practices.

[Data Governance](#)

This policy states that NPPD recognizes all forms of information (e.g., written, electronic, etc.) as valuable assets that need to be managed and protected. NPPD is committed to protecting the value of all information used in or created as a result of NPPD's business operations. NPPD will comply with all legal requirements pertaining to the use, security, or dissemination of such information.

Legal

The policy states that NPPD is committed to assuring that all District business and the actions of all District employees are conducted in accordance with applicable laws, regulations, permits, licenses, contracts, and other legal requirements. Compliance with legal requirements is imperative. Violation of legal requirements can have serious, adverse, and lasting consequences for the District. Accordingly, NPPD will emphasize the maintenance of an atmosphere and culture which complies with all legal requirements and does not condone misconduct or wrongdoing.

Nuclear Risk Management

This policy ensures nuclear safety implications, as a component of overall nuclear safety risk, are communicated to the President & Chief Executive Officer (CEO), Executive Planning Council (EPC), and the Board of Directors. This policy deals with the philosophy and delegation of authorities necessary to govern activities related to management of NPPD's nuclear risk.

Procurement

This policy states that NPPD must abide by all applicable District by-laws, Board resolutions, bond resolutions, Nebraska State Statutes, and any other relevant legal requirements and District policies for procurement activities.

Physical and Cyber Security

This policy states that NPPD recognizes the protection of its physical assets, its personnel, and its Information Technology (IT) and Operational Technology (OT) and networking infrastructure, is critical to successfully upholding its vision and mission. NPPD is committed to using the most cost effective and current technology solutions available to protect NPPD's business operations, while also complying with all legal and regulatory requirements pertaining to the use and security of these assets.

Safety

This policy provides the general policy statement and guiding principles for promoting safety in the workplace and assisting in the prevention of employee injury. NPPD and its Board of Directors are committed to creating a safe working environment with the intent of preventing or eliminating all job-related accidents, injuries, and illnesses.

Standards of Conduct

This policy ensures the District does not provide preferential treatment to its own marketing functions, with respect to access to the District's transmission system,

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compared to that of other wholesale market entities. This policy applies to all District employees who are engaged in, or have access to information related to, the District’s Transmission Function or Marketing Function.

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Owner: Conrad Saltzgaber – Chief Audit & Ethics Officer		
Reviewed By: Board of Directors		
Approved By: Board of Directors		
Revision History		
Revision Date	Revised By	Revision Description
12-13-18	Jan Modelski	Initial issue.
11-13-19	Jan Modelski	Annual review. No changes.
11-29-20	Jan Modelski	Updated for policy title changes for Data Governance and Security.
11-10-22	Conrad Saltzgaber	Removed statement that this policy also addresses the responsibilities of Entergy Nuclear Nebraska, LLC, (Entergy) with regard to NPPD and CNS.
04-13-23	Conrad Saltzgaber	Updated ERM Energy Risk Mangement to EMRM Energy Market Risk Management and SRM Strategic Risk Management to ERM Energy Risk Management.