

**Minutes of the
Oklahoma Corporation Commission
State of Oklahoma
July 9, 2026 – 1:30 p.m.**

These are the minutes for the Corporation Commission's ("Commission") regular meeting conducted in accordance with the Open Meeting Act on July 9, 2026, in the Concourse Theater, Suite C50, Will Rogers Memorial Office Building, 2401 North Lincoln Boulevard, Oklahoma City, Oklahoma 73105. Archived Commission meeting recordings may be accessed on the Commission's website.

The notice and agenda for the meeting were posted prominently and publicly at the principal office Oklahoma City, Oklahoma 73105 at 1:30 p.m., July 7, 2026, by Commission employees acting under the direction of Chairman Kim David. The notice and agenda are also made available to the public on the Commission's website, Oklahoma.gov/occ. A copy of the notice and agenda is attached to these minutes as Appendix A.

Commissioner David called the meeting to order at 1:33 p.m.

Members present were Chairman Kim David, Commissioner J. Todd Hiett, and Commissioner Brian Bingman. A quorum of the Commission was present. Interested persons participated in the meeting in person or by teleconference/videoconference when and as authorized.

Recognition of Employee Service The Commissioners gave recognition to employees for years of service in the employ of the State of Oklahoma.

Consideration of and possible vote(s) on proposed or potential orders in cases on the daily signing agenda docket. The Commission may discuss and consider alterations, revisions, or amendments to the proposed or potential orders. (Votes may be taken on individual cases, on the daily signing agenda docket as a whole, or both by individual cases and the remaining docket. The vote on daily signing agenda cases may be combined with the vote on 24-hour signing agenda cases.) Commissioner David announced the agenda item and recognized Garey Wortham, commission secretary, to present the items for approval. Mr. Wortham announced that Commission staff had requested to strike the proposed orders for Case Nos. CD2026-001494, CD2026-001495, CD2026-001869, and CD2026-002091. The Commissioners unanimously approved the remaining proposed orders.

Consideration of and possible vote(s) on proposed or potential orders in cases on attached 24-hour signing agenda docket. The Commission may discuss and consider alterations, revisions, or amendments to the proposed or potential orders. (Votes may be taken on individual cases on the 24-hour signing agenda docket as a whole, or both by individual cases and the remaining docket.) Commissioner David announced the agenda item and recognized Garey Wortham, commission secretary, to present the items for approval. The Commissioners unanimously approved the proposed orders.

Discussion of and possible vote(s) to approve a letter to Members of the United States Congress regarding State Pipeline Safety Grant Program funding and the reauthorization of the Pipeline and Hazardous Materials Safety Administration, and to authorize the Chairman to send the approval letter. Commissioner David announced the agenda item and recognized Mark Willingham, chief legal counsel for the Transportation Division, to present this

item. Discussion was held. Mr. Willingham requested that a motion be made *that the Commission approve the proposed letter regarding PHMSA and grant funding for state programs, and authorize the Chairman to send it to Oklahoma's congressional delegation, as well as the chairman and ranking members of the House Transportation and Infrastructure Committee, and the Subcommittee on Pipelines, and the House Committee on Energy and Commerce, and the Subcommittee on Energy.* Commissioner David **ADOPTED THE MOTION** and **CALLED FOR A VOTE** on the motion.

VOTE:	Commissioner David	Aye
	Commissioner Hiatt	Aye
	Commissioner Bingman	Aye

The motion passed.

A copy of the letter to be sent to the above listed entities is attached to these minutes as Appendix B.

Briefing on recent Transportation Division activity for motor carrier enforcement, ports of entry, and weigh stations, including the number of vehicles processed and screened, the dollar amounts, numbers, and types of citations issued recently and comparisons to prior periods, and the base jurisdictions involved, as listed by state—Deputy General Counsel Cole Reynolds Commissioner David recognized Mark Willingham, chief legal counsel for the Transportation Division, to provide an update on recent Transportation Division activity. Discussion was held.

Discussion on summary of agency financial activity, including review of the March, April, and May 2026 financials and possible discussion of FY 2026, FY 2027, and FY 2028 budgets—Chief Financial Officer Holly George or Comptroller Jason Harjo Commissioner David recognized Holly George, chief financial officer, to provide a summary of recent agency financial activity and agency FY 2026, FY 2027, and FY 2028 budgets. Discussion was held.

Briefing on administrative issues, which may include human resources; budget; information technology; OCC building renovation updates—Interim Director of Administration Jim Marshall Commissioner David recognized Jim Marshall, interim director of administration, to provide an update on recent administrative issues. Discussion was held.

Discussion and possible vote(s) regarding direction to Commission staff on VI (A)- (C)
No votes or actions were taken on agenda items VI (A) – (C).

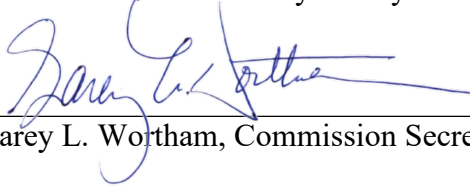
New Business There was no new business.

Adjournment The meeting adjourned at 2:20 p.m.



Kim David, Chairman

ATTESTED this 29th day of July 2026.



Garey L. Wortham, Commission Secretary



APPENDIX A
OKLAHOMA CORPORATION COMMISSION
Notice of Public Meeting
Regular Meeting



Notice is hereby given to all persons that the Oklahoma Corporation Commission (“Commission”) shall meet and conduct business, as follows:

Time, Day, and Date: 1:30 p.m. Thursday, July 09, 2026

Place: **Concourse Theater, Suite C50, Will Rogers Memorial Office Building, 2401 North Lincoln Boulevard, Oklahoma City, Oklahoma 73105**

The Concourse Theater is in the tunnel between the Will Rogers Memorial Office Building and the Sequoyah Memorial Office Building in the Capitol Complex

Purpose: Conducting of daily business enumerated in the items below

Posting Division: Chairman Kim David

AGENDA

Item	Topic
I.	A. Call to order B. Announcement concerning public notice C. Determination of quorum
II.	Recognition of Employee Service
III.	Consideration of and possible vote(s) on proposed or potential orders in cases on the daily signing agenda docket. The Commission may discuss and consider alterations, revisions, or amendments to the proposed or potential orders. (Votes may be taken on individual cases, on the daily signing agenda docket as a whole, or both by individual cases and the remaining docket. The vote on daily signing agenda cases may be combined with the vote on 24-hour signing agenda cases.)
IV.	Consideration of and possible vote(s) on proposed or potential orders in cases on attached 24-hour signing agenda docket. The Commission may discuss and consider alterations, revisions, or amendments to the proposed or potential orders. (Votes may be taken on individual cases on the 24-hour signing agenda docket as a whole, or both by individual cases and the remaining docket.)
V.	Discussion of and possible vote(s) to approve a letter to Members of the United States Congress regarding State Pipeline Safety Grant Program funding and the reauthorization of the Pipeline and Hazardous Materials Safety Administration, and to authorize the Chairman to send the approval letter.

VI.	A. Briefing on recent Transportation Division activity for motor carrier enforcement, ports of entry, and weigh stations, including the number of vehicles processed and screened, the dollar amounts, numbers, and types of citations issued recently and comparisons to prior periods, and the base jurisdictions involved, as listed by state—Deputy General Counsel Cole Reynolds B. Discussion on summary of agency financial activity, including review of the March, April, and May 2026 financials and possible discussion of FY 2026, FY 2027, and FY 2028 budgets—Chief Financial Officer Holly George or Comptroller Jason Harjo C. Briefing on administrative issues, which may include human resources; budget; information technology; OCC building renovation updates—Interim Director of Administration Jim Marshall D. Discussion and possible vote(s) regarding direction to Commission staff on VI (A)-(C)
VII.	New business A. Any matter not known about and which could not have been reasonably foreseen 24 hours before the meeting B. Possible vote(s) on matters of new business
VIII.	Adjournment

The Commission may take up the above items of business in a different sequence than that listed. The meeting is open to the public.

If public comment is listed on an agenda item, and authorized, each speaker will be allowed no more than five (5) minutes, and the subject must pertain to the agenda item.

This notice was posted prominently and publicly at the principal offices of the Oklahoma Corporation Commission at the Will Rogers Memorial Office Building, 2401 North Lincoln Boulevard, Oklahoma City, Oklahoma 73105 at 1:30 p.m., Tuesday, July 07, 2026.



BEFORE THE CORPORATION COMMISSION OF THE STATE OF OKLAHOMA DAILY SIGNING AGENDA (PROPOSED ORDERS)

Date: Thursday, July 9, 2026

Time: 1:30 PM

Location: Concourse Theater - Will Rogers Building

Case Number CD2025-001653 **Order Type** Dismissal Order **RSO** OKC

Parties GULFPORT MIDCON LLC (Applicant) **Relief Type(s)** Multi-unit horizontal well

1st Legal Loc./County S22 T3N R5W / Grady

Order Title ORDER OF THE COMMISSION
DISMISSING CAUSE

Case Number CD2025-001655 **Order Type** Dismissal Order **RSO** OKC

Parties GULFPORT MIDCON LLC (Applicant) **Relief Type(s)** Location Exception

1st Legal Loc./County S22 T3N R5W / Grady

Order Title ORDER OF THE COMMISSION
DISMISSING CAUSE

Case Number CD2025-002939 **Order Type** Interim **RSO** OKC

Parties DUNCAN OIL PROPERTIES INC (Applicant) | WALTER DUNCAN OIL LLC (Applicant) **Relief Type(s)** Location Exception

1st Legal Loc./County S1 T10N R11W / Caddo

Order Title INTERIM ORDER OF THE COMMISSION

Case Number CD2025-003441 **Order Type** Interim **RSO** TUL

Parties CORONADO ENERGY PARTNERS LLC (Applicant) **Relief Type(s)** Location Exception

1st Legal Loc./County S12 T4S R1E / Carter

Order Title INTERIM ORDER OF THE COMMISSION
HORIZONTAL WELL LOCATION
EXCEPTION

Case Number CD2025-003728 **Order Type** Dismissal Order **RSO** TUL

Parties UNIT PETROLEUM COMPANY (Applicant) **Relief Type(s)** Drilling and Spacing Unit

1st Legal Loc./County S12 T12N R12W / Caddo

Order Title ORDER DISMISSING CAUSE

Case Number CD2025-003740 **Order Type** DMOA **RSO** TUL

Parties UNIT PETROLEUM COMPANY (Applicant) **Relief Type(s)** Drilling and Spacing Unit

1st Legal Loc./County S11 T12N R12W / Caddo

Order Title ORDER DISMISSING CASE

Case Number	CD2025-003741	Order Type	DMOA	RSO	TUL
Parties	UNIT PETROLEUM COMPANY (Applicant)		Relief Type(s)	Multi-unit horizontal well	
1st Legal Loc./County	S11 T12N R12W / Caddo				
Order Title	ORDER DISMISSING CASE				
Case Number	CD2025-003742	Order Type	DMOA	RSO	TUL
Parties	UNIT PETROLEUM COMPANY (Applicant)		Relief Type(s)	Location Exception	
1st Legal Loc./County	S11 T12N R12W / Caddo				
Order Title	ORDER DISMISSING CASE				
Case Number	CD2025-003743	Order Type	DMOA	RSO	TUL
Parties	UNIT PETROLEUM COMPANY (Applicant)		Relief Type(s)	Multi-unit horizontal well	
1st Legal Loc./County	S2 T12N R12W / Caddo				
Order Title	ORDER DISMISSING CASE				
Case Number	CD2025-003744	Order Type	DMOA	RSO	TUL
Parties	UNIT PETROLEUM COMPANY (Applicant)		Relief Type(s)	Location Exception	
1st Legal Loc./County	S2 T12N R12W / Caddo				
Order Title	ORDER DISMISSING CASE				
Case Number	CD2025-003761	Order Type	DMOA	RSO	TUL
Parties	UNIT PETROLEUM COMPANY (Applicant)		Relief Type(s)	Rule - Waiver or Exception	
1st Legal Loc./County	S11 T12N R12W / Caddo				
Order Title	ORDER DISMISSING CASE				
Case Number	CD2025-003815	Order Type	Motion	RSO	OKC
Parties	THUNDERBIRD NATURAL RESOURCES LLC (Applicant)		Relief Type(s)	Pooling	
1st Legal Loc./County	S18 T10N R9W / Caddo				
Order Title	ORDER GRANTING MOTION TO REOPEN AND DISMISS				
Case Number	CD2026-000446	Order Type	Interim	RSO	OKC
Parties	THUNDERBIRD NATURAL RESOURCES LLC (Applicant)		Relief Type(s)	Location Exception	
1st Legal Loc./County	S25 T11N R11W / Caddo				
Order Title	INTERIM ORDER OF THE COMMISSION				

Case Number	CD2026-000447	Order Type	Interim	RSO	OKC
Parties	THUNDERBIRD NATURAL RESOURCES LLC (Applicant)		Relief Type(s)	Location Exception	
1st Legal Loc./County	S25 T11N R11W / Caddo				
Order Title	INTERIM ORDER OF THE COMMISSION				
Case Number	CD2026-000862	Order Type	DMOA	RSO	OKC
Parties	OVINTIV USA INC (Applicant)		Relief Type(s)	Pooling	
1st Legal Loc./County	S3 T1N R3W / Garvin				
Order Title	ORDER OF THE COMMISSION DISMISSING CAUSE				
Case Number	CD2026-001268	Order Type	Final	RSO	TUL
Parties	CULBREATH OIL&GAS CO INC (Applicant)		Relief Type(s)	Drilling and Spacing Unit	
1st Legal Loc./County	S23 T10N R7E / Seminole				
Order Title	FINAL ORDER OF THE COMMISSION SPACING				
Case Number	CD2026-001283	Order Type	Final	RSO	OKC
Parties	DUNCAN OIL PROPERTIES INC (Applicant) WALTER DUNCAN OIL LLC (Applicant)		Relief Type(s)	Pooling	
1st Legal Loc./County	S30 T12N R11W / Caddo				
Order Title	FINDINGS AND ORDER				
Case Number	CD2026-001417	Order Type	Interim	RSO	OKC
Parties	LORTZ, R MICHAEL (Applicant)		Relief Type(s)	Location Exception	
1st Legal Loc./County	S36 T12N R25W / Roger Mills				
Order Title	INTERIM ORDER OF THE COMMISSION HORIZONTAL WELL LOCATION EXCEPTION				
Case Number	CD2026-001494	Order Type	Final	RSO	OKC
Parties	BLACKJACK NATURAL RESOURCES LLC (Applicant) BLACKJACK OPERATING LLC (Applicant)		Relief Type(s)	Change of operator	
1st Legal Loc./County	S3 T6N R2W / McClain				
Order Title	ORDER OF THE COMMISSION				

Case Number	CD2026-001495	Order Type	Final	RSO	OKC
Parties	BLACKJACK NATURAL RESOURCES LLC (Applicant) BLACKJACK OPERATING LLC (Applicant)		Relief Type(s)	Change of operator	
1st Legal Loc./County	S14 T6N R2W / McClain				
Order Title	ORDER OF THE COMMISSION				
Case Number	CD2026-001496	Order Type	Final	RSO	TUL
Parties	TRILATERAL OPERATING, LLC (Applicant)		Relief Type(s)	Drilling and Spacing Unit	
1st Legal Loc./County	S8 T20N R5W / Garfield				
Order Title	REPORT OF THE COMMISSION				
Case Number	CD2026-001547	Order Type	Final	RSO	OKC
Parties	VALIDUS ENERGY II MIDCON LLC (Applicant)		Relief Type(s)	Drilling and Spacing Unit	
1st Legal Loc./County	S20 T7N R3W / McClain				
Order Title	FINAL ORDER OF THE COMMISSION SPACING				
Case Number	CD2026-001669	Order Type	Final	RSO	OKC
Parties	WARWICK-JUPITER, LLC (Applicant)		Relief Type(s)	Pooling	
1st Legal Loc./County	S29 T15N R25W / Roger Mills				
Order Title	ORDER OF THE COMMISSION				
Case Number	CD2026-001670	Order Type	Final	RSO	OKC
Parties	WARWICK-JUPITER, LLC (Applicant)		Relief Type(s)	Pooling	
1st Legal Loc./County	S32 T15N R25W / Roger Mills				
Order Title	ORDER OF THE COMMISSION				
Case Number	CD2026-001869	Order Type	Final	RSO	OKC
Parties	BLACKJACK NATURAL RESOURCES LLC (Applicant) BLACKJACK OPERATING LLC (Applicant)		Relief Type(s)	Change of operator	
1st Legal Loc./County	S32 T6N R1W / McClain				
Order Title	ORDER OF THE COMMISSION				
Case Number	CD2026-001913	Order Type	Final	RSO	OKC
Parties	WARWICK-JUPITER, LLC (Applicant)		Relief Type(s)	Pooling	
1st Legal Loc./County	S28 T15N R25W / Roger Mills				
Order Title	ORDER OF THE COMMISSION				

Case Number CD2026-001914 **Order Type** Final **RSO** OKC
Parties WARWICK-JUPITER, LLC (Applicant) **Relief Type(s)** Pooling
1st Legal Loc./County S33 T15N R25W / Roger Mills
Order Title ORDER OF THE COMMISSION

Case Number CD2026-002085 **Order Type** Nunc Pro Tunc **RSO** TUL
Parties VALIDUS ENERGY II MIDCON LLC (Applicant) **Relief Type(s)** Pooling
1st Legal Loc./County S29 T13N R10W / Canadian
Order Title ORDER OF THE COMMISSION NUNC
PRO TUNC CORRECTING ORDER NO
758562

Case Number CD2026-002091 **Order Type** Final **RSO** TUL
Parties AXIA ENERGY III LLC (Applicant) **Relief Type(s)** Prior Order/Permit - Clarify/Confirm/Determine
1st Legal Loc./County S18 T21N R10W / Major
Order Title FINAL ORDER OF THE COMMISSION
CONFIRMATION OF ORDER NO. 750559
DRILLING AND SPACING UNITS

Case Number CD2026-002097 **Order Type** Final **RSO** OKC
Parties MEWBOURNE OIL COMPANY (Applicant) **Relief Type(s)** Pooling
1st Legal Loc./County S4 T12N R22W / Roger Mills
Order Title ORDER OF THE COMMISSION
FINDINGS AND ORDER

Case Number CD2026-002120 **Order Type** Interim **RSO** TUL
Parties NADEL AND GUSSMAN LLC (Applicant) |
VOGEL EXPLORATION LLC (Applicant) **Relief Type(s)** Multi-unit horizontal well
1st Legal Loc./County S16 T13N R19W / Custer
Order Title INTERIM ORDER OF THE COMMISSION
MULTIUNIT HORIZONTAL WELL

Case Number CD2026-002121 **Order Type** Interim **RSO** TUL
Parties NADEL AND GUSSMAN LLC (Applicant) |
VOGEL EXPLORATION LLC (Applicant) **Relief Type(s)** Location Exception
1st Legal Loc./County S16 T13N R19W / Custer
Order Title INTERIM ORDER OF THE COMMISSION
HORIZONTAL WELL LOCATION
EXCEPTION

Case Number	CD2026-002122	Order Type	Interim	RSO	TUL
Parties	NADEL AND GUSSMAN LLC (Applicant) VOGEL EXPLORATION LLC (Applicant)		Relief Type(s)	Multi-unit horizontal well	
1st Legal Loc./County	S16 T13N R19W / Custer				
Order Title	INTERIM ORDER OF THE COMMISSION MULTIUNIT HORIZONTAL WELL				
Case Number	CD2026-002123	Order Type	Interim	RSO	TUL
Parties	NADEL AND GUSSMAN LLC (Applicant) VOGEL EXPLORATION LLC (Applicant)		Relief Type(s)	Location Exception	
1st Legal Loc./County	S16 T13N R19W / Custer				
Order Title	INTERIM ORDER OF THE COMMISSION HORIZONTAL WELL LOCATION EXCEPTION				
Case Number	CD2026-002139	Order Type	Interim	RSO	OKC
Parties	MEWBOURNE OIL COMPANY (Applicant)		Relief Type(s)	Multi-unit horizontal well	
1st Legal Loc./County	S21 T13N R24W / Roger Mills				
Order Title	INTERIM ORDER OF THE COMMISSION				
Case Number	CD2026-002140	Order Type	Interim	RSO	OKC
Parties	MEWBOURNE OIL COMPANY (Applicant)		Relief Type(s)	Location Exception	
1st Legal Loc./County	S21 T13N R24W / Roger Mills				
Order Title	INTERIM ORDER OF THE COMMISSION				
Case Number	CD2026-002212	Order Type	Interim	RSO	OKC
Parties	CAMINO NATURAL RESOURCES LLC (Applicant)		Relief Type(s)	Multi-unit horizontal well	
1st Legal Loc./County	S33 T8N R7W / Grady				
Order Title	INTERIM ORDER OF THE COMMISSION				
Case Number	CD2026-002214	Order Type	Interim	RSO	OKC
Parties	CAMINO NATURAL RESOURCES LLC (Applicant)		Relief Type(s)	Location Exception	
1st Legal Loc./County	S33 T8N R7W / Grady				
Order Title	INTERIM ORDER OF THE COMMISSION				
Case Number	CD2026-002217	Order Type	Interim	RSO	OKC
Parties	CAMINO NATURAL RESOURCES LLC (Applicant)		Relief Type(s)	Multi-unit horizontal well	
1st Legal Loc./County	S33 T8N R7W / Grady				
Order Title	INTERIM ORDER OF THE COMMISSION				

Case Number	CD2026-002218	Order Type	Interim	RSO	OKC
Parties	CAMINO NATURAL RESOURCES LLC (Applicant)	Relief Type(s)	Location Exception		
1st Legal Loc./County	S33 T8N R7W / Grady				
Order Title	INTERIM ORDER OF THE COMMISSION				
Case Number	CD2026-002220	Order Type	Interim	RSO	OKC
Parties	CAMINO NATURAL RESOURCES LLC (Applicant)	Relief Type(s)	Multi-unit horizontal well		
1st Legal Loc./County	S33 T8N R7W / Grady				
Order Title	INTERIM ORDER OF THE COMMISSION				
Case Number	CD2026-002221	Order Type	Interim	RSO	OKC
Parties	CAMINO NATURAL RESOURCES LLC (Applicant)	Relief Type(s)	Location Exception		
1st Legal Loc./County	S33 T8N R7W / Grady				
Order Title	INTERIM ORDER OF THE COMMISSION				
Case Number	CD2026-002315	Order Type	Final	RSO	OKC
Parties	FW MIDCON I LLC (Applicant)	Relief Type(s)	Pooling		
1st Legal Loc./County	S35 T14N R8W / Canadian				
Order Title	ORDER OF THE COMMISSION				
Case Number	EN2026-000176	Order Type	Final	RSO	OKC
Parties	SWIGART, PAUL (Applicant) D&K AUTOMOTIVE & WRECKER SERVICES, LLC (Respondent)	Relief Type(s)	Contempt, Assess Fine(s)		
1st Legal Loc./County	No County Indicated				
Order Title	Final Order				
Case Number	PD2026-000049	Order Type	Emergency	RSO	TUL
Parties	TRILATERAL OPERATING, LLC (Applicant)	Relief Type(s)	UIC Rules Exception		
1st Legal Loc./County	S16 T20N R5W / Garfield				
Order Title	EMERGENCY ORDER				



BEFORE THE CORPORATION COMMISSION OF THE STATE OF OKLAHOMA 24 HR SIGNING AGENDA (PROPOSED ORDERS)

Date: Thursday, July 9, 2026

Time: 1:30 PM

Place: CONCOURSE THEATER - WILL ROGERS
BUILDING

Case Number PUD2026-000046 **Order Type** Motion **RSO** OKC

Parties OKLAHOMA GAS AND ELECTRIC
COMPANY (Applicant)

Order Title ORDER GRANTING MOTION FOR
PROCEDURAL SCHEDULE

Relief In Caption IN THE MATTER OF THE APPLICATION
OF OKLAHOMA GAS AND ELECTRIC COMPANY FOR AN
ORDER OF THE COMMISSION APPROVING ITS NEW
EXTRA LARGE LOAD TARIFF AND TERMS AND
CONDITIONS OF SERVICE FOR EXTRA LARGE LOAD
CUSTOMERS AND A REGULATORY ASSET TO RECOVER
COSTS ASSOCIATED WITH PORTFOLIO OPTIMIZATION
SOFTWARE

Case Number PUD2026-000046 **Order Type** Motion **RSO** OKC

Parties OKLAHOMA GAS AND ELECTRIC
COMPANY (Applicant)

Order Title ORDER GRANTING MOTION TO
DETERMINE NOTICE REQUIREMENTS AND
APPROVE FORM OF NOTICE

Relief In Caption IN THE MATTER OF THE APPLICATION
OF OKLAHOMA GAS AND ELECTRIC COMPANY FOR AN
ORDER OF THE COMMISSION APPROVING ITS NEW
EXTRA LARGE LOAD TARIFF AND TERMS AND
CONDITIONS OF SERVICE FOR EXTRA LARGE LOAD
CUSTOMERS AND A REGULATORY ASSET TO RECOVER
COSTS ASSOCIATED WITH PORTFOLIO OPTIMIZATION
SOFTWARE

Case Number PUD2026-000046 **Order Type** Motion **RSO** OKC

Parties OKLAHOMA GAS AND ELECTRIC
COMPANY (Applicant)

Order Title ORDER GRANTING PROTECTIVE
ORDER

Relief In Caption IN THE MATTER OF THE APPLICATION
OF OKLAHOMA GAS AND ELECTRIC COMPANY FOR AN
ORDER OF THE COMMISSION APPROVING ITS NEW
EXTRA LARGE LOAD TARIFF AND TERMS AND
CONDITIONS OF SERVICE FOR EXTRA LARGE LOAD
CUSTOMERS AND A REGULATORY ASSET TO RECOVER
COSTS ASSOCIATED WITH PORTFOLIO OPTIMIZATION
SOFTWARE

APPENDIX B



July 9, 2026

The Honorable Sam Graves
Chairman
Committee on Transportation & Infrastructure
U.S. House of Representatives
Washington, D.C. 20515

The Honorable Brett Guthrie
Chairman
Committee on Energy & Commerce
U.S. House of Representatives
Washington, D.C. 20515

The Honorable Daniel Webster
Chairman
Subcommittee on Pipelines
U.S. House of Representatives
Washington, D.C. 20515

The Honorable Robert E. Latta
Chairman
Subcommittee on Energy
U.S. House of Representatives
Washington, D.C. 20515

The Honorable Rick Larsen
Ranking Member
Committee on Transportation & Infrastructure
U.S. House of Representatives
Washington, D.C. 20515

The Honorable Frank Pallone
Ranking Member
Committee on Energy & Commerce
U.S. House of Representatives
Washington, D.C. 20515

The Honorable Dina Titus
Ranking Member
Subcommittee on Pipelines
U.S. House of Representatives
Washington, D.C. 20515

The Honorable Kathy Castor
Ranking Member
Subcommittee on Energy
U.S. House of Representatives
Washington, D.C. 20515

RE: State Pipeline Safety Grant Funding and PHMSA Reauthorization

Dear Chairmen Graves, Webster, Guthrie, and Latta, and Ranking Members Larsen, Titus, Pallone, and Castor:

On behalf of the Oklahoma Corporation Commission (OCC), I am writing to respectfully request your support for robust funding of state pipeline safety programs as Congress considers appropriations related to the Pipeline and Hazardous Materials Safety Administration (PHMSA) and the reauthorization of the Natural Gas Pipeline Safety Act.

State pipeline safety programs are a critical part of the nation's pipeline safety framework. Through certification by PHMSA, state commissions and state pipeline safety inspectors, like those within the OCC, serve as the federal government's front-line partners in inspecting pipeline operators, enforcing federal and state pipeline safety requirements, and protecting the public.

Oklahoma's Leadership in Pipeline Safety

The OCC's Pipeline Safety Department administers the state's intrastate regulatory program to ensure the safe transportation of natural gas, petroleum, and hazardous materials. It oversees more than 258

intrastate gathering, transmission, underground natural gas storage, and distribution operators, as well as 33 intrastate hazardous liquid operators, covering over 64,614 miles of pipeline. The Department employs 19 full-time staff dedicated to gas and hazardous liquid pipeline safety enforcement, regulations, inspections, and emergency response. As a leading oil and gas producer with significant upstream development in the STACK and SCOOP plays, Oklahoma maintains a vast pipeline network that links production fields to processing facilities, interstate systems, and national markets.

These systems converge at the hub in Cushing, Oklahoma, widely known as the "Pipeline Crossroads of the World," serving as a national focal point for crude oil storage, distribution, and pricing.

Across the country, state pipeline safety programs oversee more than 80% of the pipelines in the US, with 2.3 million miles of gas distribution mains and service lines, 105,000 miles of gas transmission pipelines, and more than 109,000 miles of jurisdictional gas gathering pipelines. This federal-state partnership is effective because it places trained inspectors close to the communities, operators, systems, and risks they oversee. However, the strength of this partnership depends on Congress providing sufficient funding for state pipeline safety grants.

Funding Challenges Impact Safety

Under current law, PHMSA may reimburse states for up to 80% of eligible pipeline safety program costs, though due to PHMSA's scoring and grant structure, maximum practical reimbursement is approximately 78.5% of actual costs. Unfortunately, recent appropriations have fallen well short of that level. According to PHMSA's own figures, state reimbursement levels were 63.36% in FY 2022, 53.13% in FY 2023, 68.39% in FY 2024, and 63.56% in FY 2025.

These funding shortfalls create real challenges for state programs. Congress and PHMSA continue to place additional responsibilities on state pipeline safety programs, including more complex inspection requirements, expanded data and reporting expectations, and evolving oversight duties. At the same time, states are being asked to absorb a larger share of program costs. This creates an unfunded federal mandate that can strain staffing, training, travel, inspection capacity, and enforcement resources.

For these reasons, I respectfully request that the Appropriations Committee provide funding for state pipeline safety grants at levels sufficient to meet the maximum reimbursement level of approximately 78.5% of estimated state program costs. Based on current estimates, that would require the following state grant funding levels:

Fiscal Year	Requested State Grant Funding Level
FY 2026	\$103.1 million
FY 2027	\$110.6 million
FY 2028	\$118.7 million
FY 2029	\$127.4 million
FY 2030	\$136.7 million

Fully funding these grants is not simply a budgetary issue; it is a public safety issue. Adequate reimbursement allows states to retain experienced inspectors, train new staff, conduct timely inspections, enforce pipeline safety regulations, and respond to emerging risks. Without sufficient federal support, state programs may be forced to do more with less, even as mission requirements continue to expand.

I also respectfully ask that Congress preserve language in pipeline safety reauthorization legislation ensuring that state pipeline safety base grants are not conditioned on compliance with damage prevention practices that fall outside the authority or jurisdiction of the state pipeline safety program. In many states, damage prevention involves multiple stakeholders and agencies, including telecommunications, electric, water, sewer, excavation, and local government entities. State pipeline safety programs should not be penalized for matters beyond their control.

Preserving this protection is essential to ensuring that grant funding intended for pipeline safety inspections and enforcement remains available for that purpose. State pipeline safety programs should be held accountable for the responsibilities assigned to them, but they should not lose core safety funding due to broader damage prevention requirements that depend on entities outside their authority.

Thank you for your consideration of this request and for your continued support of pipeline safety. I would welcome the opportunity to work with you and your staff to ensure that state pipeline safety programs have the resources necessary to protect the public, support effective oversight, and maintain the strong federal-state partnership that has long been central to pipeline safety.

Sincerely,

A handwritten signature in black ink that reads "Kim David". The signature is fluid and cursive, with the first name "Kim" and last name "David" clearly distinguishable.

Kim David

Chairman

Oklahoma Corporation Commission

Cc:

Senator James Lankford

Senator Alan Armstrong

Representative Kevin Hern

Representative Josh Brecheen

Representative Frank Lucas

Representative Tom Cole

Representative Stephanie Bice