

State of Nebraska

Accountability and Disclosure Commission

P.O. BOX 95086
Lincoln, Nebraska 68509
nadc.nebraska.gov



Centre Terrace, 1225 L St. #400
Phone (402) 471-2522
Fax (402) 471-6599

June 26, 2025

Dennis Grennan
1877 W Calle Colombo
Columbus, NE 68601

Re: C-2 Potential Conflict of Interest Statement

Dear Mr. Grennan,

This will acknowledge receipt of a C-2, Potential Conflict of Interest Statement ("Statement"), which you filed with the Nebraska Accountability and Disclosure Commission ("NADC") on Tuesday, June 24, 2025.

You are a Board Member of the Nebraska Power Review Board ("Board"). You are also a part-time employee of HDR Engineering, and you are not in the senior management of that organization, nor do you own stock in HDR.

HDR has contracted with Lincoln Electric System ("LES") to provide engineering services for a project. The project will be presented to the Board at its July 18th meeting. Essentially, LES will seek approval at that time for an application to build two 52 MW combined cycle generating units. As a Board Member, you will be called upon to vote on this project.

You note that you have not worked on the HDR contract with LES.

Under the terms of §49-1499.02(1) of the Nebraska Political Accountability and Disclosure Act ("NPADA"), you must file a Statement, as you have done, where you would be required, "to take any action or make any decision," in the discharge of your official duties that, "may cause financial benefit or detriment to [you], a member of your immediate family, or a business with which [you are] associated."

The term "business" is defined in §49-1407 to include, "any corporation." The term "business with which the individual is associated," is defined in §49-1408 to include a business, "...in which the individual is a partner, limited liability company member, director, or officer."

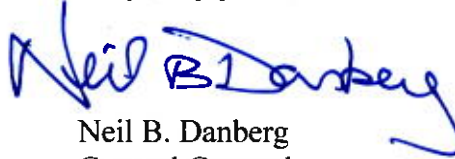
As a part-time worker for HDR, and given your position with HDR, as explained in your Statement, HDR does not constitute a business with which you are associated. You have no financial interest in the LES project, and you have not worked on the HDR contract with LES. In any event, LES is a political subdivision, and it does not fall within the definition of a business association. We conclude that you do not have a conflict of interest which would prevent you from acting upon the LES application in question.

The NPADA does not address the question of appearance of conflict. On occasion, some public officials or employees recuse themselves from voting on matters which involve the organization for whom they work—even though the terms of the NPADA would not require such abstention. The question of appearance of conflict is a matter of judgment on the part of the individual affected, and it is not legally required under any provision of the NPADA.

Our opinion in this matter is premised upon the material facts which we have outlined above. If any of these facts are inaccurate or incomplete, please contact us immediately.

Thank you for your timely filing of the subject Statement.

Very truly yours,



Neil B. Danberg
General Counsel

cc: Tim Texel

NEBRASKA ACCOUNTABILITY AND DISCLOSURE COMMISSION P.O. Box 95086 Lincoln, NE 68509 (402) 471-2522 https://nadc.nebraska.gov	POTENTIAL CONFLICT OF INTEREST STATEMENT NADC FORM C-2	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 20%; padding: 2px;">POSTMARK DATE</td> <td style="padding: 2px;">6/24/2025</td> </tr> <tr> <td style="padding: 2px;"></td> <td style="padding: 2px;">EM S</td> </tr> <tr> <td colspan="2" style="text-align: center; padding: 5px;">OFFICE USE ONLY</td> </tr> <tr> <td colspan="2" style="text-align: center; padding: 10px;"> RECEIVED JUN 24 2025 NEBRASKA ACCOUNTABILITY and DISCLOSURE COMMISSION </td> </tr> </table>	POSTMARK DATE	6/24/2025		EM S	OFFICE USE ONLY		RECEIVED JUN 24 2025 NEBRASKA ACCOUNTABILITY and DISCLOSURE COMMISSION	
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BEFORE COMPLETING THIS FORM READ THE FILING REQUIREMENTS ON PAGE 3										

- An official or employee of the executive branch of state government or any other official or employee required to file a Statement of Financial Interests (Form C-1) must file this form if he or she has a potential conflict of interest.
- All other public officials who have a potential conflict of interest would file a Potential Conflict of Interest Statement Form C-2A. Additionally, any employee of a political subdivision whose annual salary and benefits exceed \$150,000 must file a Potential Conflict of Interest Statement Form C-2A if he or she has a potential conflict.
- File this Potential Conflict of Interest Statement with the Nebraska Accountability and Disclosure Commission and with your immediate superior (if any) whenever a potential conflict of interest situation arises.
- Persons who fail to disclose a potential conflict of interest or who otherwise do not comply with the law are subject to penalties.

ITEM 1	NAME, ADDRESS AND TELEPHONE NUMBER																
<table style="width: 100%;"> <tr> <td style="width: 10%;">Name</td> <td style="width: 40%;">Grennan Dennis</td> <td style="width: 10%;">Telephone No.</td> <td style="width: 40%;">402-5662-0892</td> </tr> <tr> <td></td> <td style="text-align: center;">Last First Middle</td> <td></td> <td></td> </tr> <tr> <td>Address</td> <td colspan="3">1877 W Calle Colombo Columbus, Nebr. 68601</td> </tr> <tr> <td></td> <td style="text-align: center;">STREET ADDRESS OR RURAL ROUTE</td> <td style="text-align: center;">City</td> <td style="text-align: center;">STATE ZIP CODE</td> </tr> </table>		Name	Grennan Dennis	Telephone No.	402-5662-0892		Last First Middle			Address	1877 W Calle Colombo Columbus, Nebr. 68601				STREET ADDRESS OR RURAL ROUTE	City	STATE ZIP CODE
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ITEM 2	TITLE, AGENCY, ADDRESS, PHONE AND SUPERIOR												
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ITEM 3	DESCRIBE POTENTIAL CONFLICT OF INTEREST IN DETAIL (Use Item 7 Continuation, if necessary)
Date action is to be taken or decision is to be made: _____ Description of Potential Conflict: Lincoln Electric System [LES] has filed an application with the Power Review Board [PRB] for two 52 MW gas and fuel oil comined cycle generating units and seeking approval to build. This application will be reviewed at the PRB's meeting July 18, 2025 meeting. HDR Engineering was contracted to do engineering services for this project. I am a part time employee of HDR but have not worked on the LES project, nor anticipate working on the project. Even though my title is VP, Power Client Development Leader, I am not part of HDR's governing or decision-making structure. HDR has several hundred employees with the title of VP. I do not own HDR stock per HDR policy for part time employees.	

ITEM 4 | PERSONS WHO MAY RECEIVE FINANCIAL BENEFIT OR DETRIMENT☐ You☐ Member of your Immediate Family: _____

NAME

Business With Which You

☒ Are Associated (See Definitions) HDR Engineering

NAME OF BUSINESS

ITEM 5 | NATURE OF FINANCIAL BENEFIT OR DETRIMENT

HDR was contracted with LES to provide engineering services.

ITEM 6 | FOR MEMBERS OF THE LEGISLATURE ONLY

If you will not abstain from acting on a matter state why, despite the potential conflict, you intend to vote or otherwise participate.

ITEM 7 | CONTINUATION

Dennis Grennan 6/24, 2025

(SIGNATURE)

(DATE)