

Community Benefits Plan

OG&E is an essential partner of the communities in which we serve, work, and live; we provide service over a vast 30,000 square mile service area, covering more land than 10 U.S. states. There are 19 Tribal tracts¹, 20 federally recognized tribes, and about 150 disadvantaged communities (DACs) within OG&E's service area. This gives OG&E the unique opportunity to develop a Community Benefits Plan with overarching regional significance. As a company, we have an action-oriented approach to community benefits and engagement which touches on the four areas of importance outlined by the DOE: engaging in Communities and Labor, Investing in the American Workforce, advancing Diversity, Equity, Inclusion, and Accessibility (DEIA), and committing to the Justice40 Initiative. If awarded this grant, we plan to publish our Community Benefits Plan (CBP) publicly so that our key stakeholders, customers, and the broader community can engage with us regarding our planned actions to benefit our community.

Our Plan Takes Strong and Dedicated Action in Each of the Four DOE Focus Areas:

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| 1 Community & Labor: Project listening sessions, track record of past partnerships, and community agreements to benefit the broader region | 2 Investing in the American Workforce: SMART milestones dedicated to worker voice, safety, and best in region benefits and compensation |
| 3 DEIA: SMART milestones focused on internal DEIA, supplier diversity spending & outreach, and community education programs | 4 Justice40: 100% of project investments providing benefits to DACs/Tribal lands and commitment to listening sessions in Justice40 communities |

Our efforts to promote these areas will expand as we execute the Adaptable Grid Project (the "Project") and help to grow the future Clean Energy Economy, a national transformation for which the state of Oklahoma is at the center. Based on an analysis of a recent study conducted by Princeton University², Oklahoma is projected to be in the top 10 for states with the most green energy industry jobs added per capita by 2050, with the increased green energy demand, and is expected to see a large influx of energy sector jobs.

The Smart Grid Grant Allows OG&E to Make Transformative Investments for Communities

OG&E is pursuing the Smart Grid Grant to empower this transformation and prepare our grid to support the needs of the growing green economy. A key focus of our planning is to identify community benefits that both deliver near-term and increase value as the grid evolves.

There are 20 Tribal nations and about 150 disadvantaged communities represented in OG&E's service area. OG&E has a longstanding relationship with the Tribal nations and has established successful solar farm projects with two. There are additional opportunities for OG&E to work with the tribes to take advantage of the dedicated Tribal funding within the Bipartisan Infrastructure Law (BIL) that count Tribal nations as eligible applicants or beneficiaries.

Overview of Our Community Benefits Plan

We are actively pursuing agreements to expand our community partnerships to make the greatest impact. Specifically, community agreements will bolster Tribal and regional economic development support programs to create pathways for economic growth in our service area, benefit education programs to facilitate the future Clean Energy Economy, and develop service

¹ Tribal tracts per Justice40 served by OG&E: Cheyenne – Arapaho, Caddo – Wichita – Delaware, Chickasaw, Choctaw, Citizen Potawatomi Nation – Absentee Shawnee, Seminole, Creek / Seminole, Creek, Kickapoo, Iowa, Sac and Fox, Cherokee, Osage, Pawnee, Otoe – Missouria, Ponca, Kaw – Ponca, Kaw, Tonkawa

² [Net-Zero America Project](#), OG&E Analysis

guarantee support programs to assist our customers in making deposits without placing additional burdens on household income.

We continue to offer an employee experience that exceeds DOE’s definition of a quality job, demonstrating our efforts to invest in the American workforce. Additionally, we have defined SMART milestones in each budget period to ensure that the voice of our workers is accounted for. Our salaries and benefit programs more than exceed the regional average and we consistently rank as one of the most respected employers in Oklahoma. As we hire to implement the Adaptable Grid Project, we will continue to offer an exceptional employee experience.

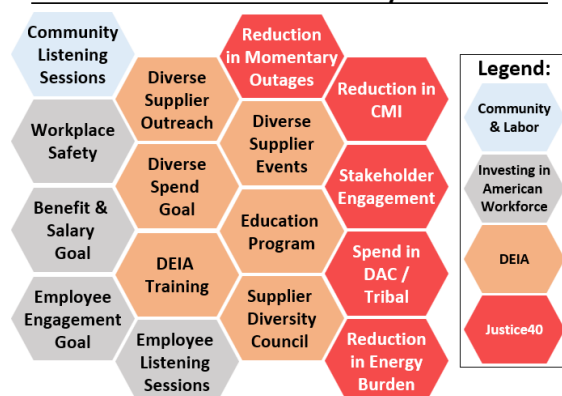
OG&E incorporates Diversity, Equity, Inclusion, and Accessibility (DEIA) into everything we do. Our commitment to DEIA extends to our suppliers and contractors as well. As part of the Adaptable Grid Project, we have established DEIA goals for internal employees, third-party contractors, and suppliers.

Our proposed Project exceeds the Justice40 requirement by targeting infrastructure serving DACs and/or Tribal lands, ensuring 100% of project investments will benefit these areas. We have identified multiple, trackable benefits that align with the Justice40 policy priorities and directly impact our DAC and Tribal communities. Additionally, we will conduct community listening sessions in Justice40 communities and target outreach to diverse suppliers.

SMART Milestones Per Budget Period & Stages of the CBP

OG&E’s comprehensive CBP was designed to include detailed SMART milestones across Community & Labor, Investing in the American Workforce, DEIA, and Justice40. These goals will begin in the initial stages of project planning and continue through implementation and into operation. The included figure shows a guide to the milestones throughout the Project. OG&E’s plan comprises at least one SMART milestone per budget period; many periods contain multiple milestones.

SMART Milestones In Community Benefits Plan

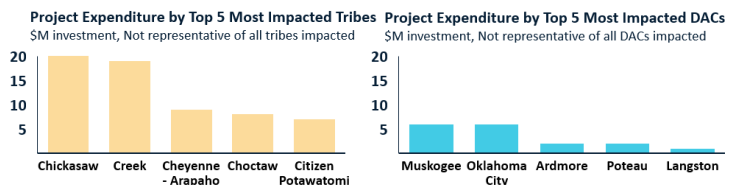


OG&E’s comprehensive CBP will not wait to commence until the first shovel hits the ground. During the pre-grant approval phase, we have already started engaging with key stakeholders to work towards agreements that will define clear benefits impacting the broader community. DEIA goals related to supplier diversity, employee learning, and community education partnership will run throughout the project lifecycle. Community engagement will be another key focus of the planning phase and will include opportunities for community members and key stakeholders to provide input on the Project. Community feedback resulting from the activities will be recorded and takeaways will be incorporated into future project efforts.

Community and Labor Engagement

OG&E has a proven track record of collaborating and engaging with our broader community, including Tribal entities, local governments, various educational institutions, and community-serving organizations. OG&E will be making investments in many Tribal lands and DACs as part of

this Project. We plan to engage with those living in these communities to help them understand the project's benefits and offer them involvement in all phases of the development cycle.



As part of the investment in the Adaptable Grid Project, OG&E has multiple community benefits agreements, which are currently in various stages of development. As Oklahoma becomes more of a focal point in the future green economy, OG&E is committed to partnering with surrounding communities to ensure that its customers and the broader region are positioned to benefit and grow. A major part of this growth opportunity is contingent upon solidifying the right community benefit agreements to ensure the success of our community partners.

Community Benefits Agreements and Partnerships Expected with the Project

OG&E has three community benefits agreements which will be pursued in conjunction with the Adaptable Grid Project. If awarded the funds, OG&E will develop the programs described below through a signed agreement with community members. The programs will enable additional energy investment for the region, support DACs, and improve education and workforce planning.

Expansion of OG&E Grant Office

In response to the once-in-a-generation opportunity that the Bipartisan Infrastructure Law (BIL), Inflation Reduction Act (IRA), and other funding present, OG&E recently created an internal Grant Office designed to build more knowledge about these programs and, in turn, align OG&E's efforts to federal, state, regional, and Tribal goals.

If this application is accepted, our Grant Office will expand efforts with a particular focus on Tribal nations and work with our internal Community Affairs team to collaborate with the 370 boards, organizations, and committees with whom OG&E is currently involved. Our Grant Office has already evaluated more than 350 grant programs and will be uniquely qualified to provide support to Tribal partners who are interested in accessing government funding. Our Grant Office will use this framework to help Tribal leaders understand and align funding opportunities to local needs. Additionally, the Grant Office will assist OG&E with understanding how to provide the necessary effort to translate opportunities into resulting benefits. This program will be interactive and will be developed in conjunction with key Tribal partners.

Statewide Education Innovation Network

In a similar fashion, OG&E sees the opportunity to expand existing programs to take advantage of this project's impact in specific neighborhoods, towns, or Tribal Lands. OG&E already partners with educational organizations to develop training, education, and workforce development programs and delivers them to the groups that are most in need. OG&E has begun an effort to create a "statewide innovation network" by working with the existing program partners. The potential opportunity is for OG&E to help identify new partners for the delivery of education, workforce development, or training to expand the target population of "students" that can take advantage of these programs. Key partners of the initiative include Oklahoma State University – Oklahoma City (OSU-OKC), and the Last Mile organization. In today's interconnected world, there are many examples of how such a delivery network can be developed. This program will help train the workforce to support the future electric grid.

Service Guarantor Program – Expansion of “Growing TOGETHER”

OG&E has a long-standing umbrella of community programs associated with our “Growing TOGETHER” messaging. Approval of this application provides OG&E with an opportunity to expand the included programs into new initiatives. One example is the opportunity to work with organizations in DACs to eliminate the need for new customers to provide a security deposit as a prerequisite for establishing an OG&E account. OG&E conducts listening sessions with stakeholders throughout its service area. In discussions with partners serving those in DACs, the need to provide a security deposit has been identified as a significant impediment for residents to access power for their homes. OG&E proposes to establish a new way that organizations can step in as a “guarantor” for accounts that would otherwise require an up-front deposit. There would be no up-front cost for the partner organization. Instead, OG&E would rely on its relationship with the partner organization as the primary point of confidence for payment of any individual’s bill. The new service guarantor program is a potential community benefits agreement with an opportunity for expansion. In addition to the benefit of reducing the burden of deposits, this program will also offer community members insights into energy-saving tips. This program could be expanded to prioritize weatherization and energy efficiency assistance for these customers.

Longstanding Commitment to Community Benefits

OG&E’s community engagement efforts go beyond job creation. Today, we foster Science, Technology, Engineering, and Mathematics (STEM) skills through our hands-on technical career partnerships. We work with high schools, universities, and community-based institutions and organizations to educate and attract individuals and to build a pipeline of career opportunities to diversify the energy sector for long-term success. Additionally, we offer weatherization to low-income customers, which our Tribal partners significantly utilize. As part of our efforts to engage with the community, OG&E is committed to holding listening sessions and community roundtables during all phases of the Project. We intend to ensure that these sessions are interactive and allow the community to provide inputs that will be incorporated into the Project if possible.

Community and Labor Engagement – SMART Milestone

Community & Labor Engagement SMART Milestone	Metric
Community Engagement and Listening Sessions Goal: OG&E will engage in 20 community workshops annually in conjunction with the Project. Typically, OG&E holds at least 10 community workshops per year that give over 100 community members an opportunity to hear and be heard. This project will increase the total amount of community listening sessions by 100%. These workshops will happen every year over the course of the Project, starting in the planning phase. Community member feedback will be incorporated into the project planning efforts when possible.	100% Increase in Annual Sessions

Community Engagement and Existing Partnerships

We have long-standing partnerships with OSU-OKC, and Oklahoma State University Institute of Technology (OSUIT), located in a DAC and Tribal land respectively, to develop training materials and deliver internship experiences for electric utility worker programs with the goal to hire participants full-time upon graduation. The Urban League of Greater Oklahoma City (OKC) Inc., based in a DAC, is the recipient of an OG&E \$175,000 grant that funds their Urban Young Adult Reentry Program. Our funding provides energy industry training and creates awareness of opportunities with OG&E and our contractors. We have intentionally focused our recruiting

efforts for internships towards Langston University, the only Historically Black College or University (HBCU) in OG&E's service area, which is also located in a DAC. We strengthened this partnership by becoming a Distinguished Employer Partner, allowing us to engage even further with students. We also provide jobs to active-duty personnel transitioning from the Ft. Sill base through our long-standing agreement with the U.S. military. This agreement has provided veterans with job opportunities across many sectors of our business, including Human Resources, Transmission & Distribution, Cyber-Security, and Power Plant Operations. In addition, OG&E recruits from career technology schools in OKC through our community outreach program to fill internship positions in our Power Delivery group. OG&E also maintains a relationship with the Cherokee Nation Line Worker School. This program helps to train utility workers and OG&E partners with the Cherokee Nation to provide internships in Transmission & Distribution roles. OG&E will continue to uphold our commitment to support local governments, Tribal entities, and other local stakeholders with the goal to expand engagement in the future by enhancing existing partnerships and cultivating new ones. OG&E is meeting with community leadership throughout Oklahoma, focusing on historically disadvantaged or underrepresented communities. This process is iterative and begins by meeting with communities and listening to their needs. After contemplating the meeting takeaways, OG&E will return to build community action plans and provide the necessary resources to bring these plans to life.

Investing in the American Workforce

OG&E is one of the premier employers in Oklahoma; we are known for our caring and inclusive culture, which is underpinned by the "Our Power to Grow"³ values program. Our values and beliefs define who we are at OG&E, summarized by the phrase: Live Safely, Achieve Together, and Value Diversity & Inclusion⁴. As a testament to our continuous investment in our workforce, Forbes ranked us as the second-best employer in Oklahoma in 2022. OG&E provides competitive compensation and benefits packages to full-time employees. Our compensation philosophy is designed to attract, reward, and retain high-performing employees as part of a comprehensive and transparent total rewards package. Our programs are designed to recognize employee performance and encourage career development through competitive and transparent pay practices benchmarked against applicable labor markets. Overall, our compensation philosophy is balanced by fiscal responsibility to our customers, employees, and external stakeholders.

Plans to Attract & Retain a Skilled Workforce

OG&E will provide a best-in-class employment opportunity for all individuals hired to support the Adaptable Grid Project. We strive to remain a leader in employee experience on a state, regional, and national scale. Our approach to hiring for the Project will reflect the core values that make up our traditional hiring approach. As OG&E hires new personnel to fill Project roles, we will provide a comprehensive benefits package for full-time employees with the following key components: competitive salary, 401K plan with a 200% match, medical plan options, including a \$0 premium medical plan, generous paid leave, opportunities for tuition reimbursement, and professional development.

³ [OG&E - Values & Beliefs \(oge.com\)](https://www.oge.com/ogebeliefs)

⁴ [OG&E Values and Beliefs](https://www.oge.com/ogebeliefs)

OG&E's salary and benefits exceed DOE expectations for quality jobs. As disclosed in our 2022 Proxy, the median employee salary at OG&E is \$125,889 (inclusive of items additional to annual salaries such as year-end bonus and company-matched 401K dollars). Comparatively, the U.S. Census Bureau shows median household income in Oklahoma to be \$55,826 in Oklahoma and \$52,528 in Arkansas, reflecting that OG&E more than doubles the average pay for both states we serve. Our employee compensation exceeds the national average as well, with the U.S. Census Bureau reporting the median household income in the U.S. at \$69,717 in 2021.

OG&E conducts pay equity reviews every three years to maintain strong employee compensation standards and make adjustments where needed. We also conduct third-party-led annual reviews of national survey data to compare sentiments towards OG&E jobs to industry-wide trends. These market checks allow OG&E's compensation and benefits to remain competitive against our industry peers nationally and regionally. OG&E's overall pay is 100% of our established midpoints, proving our employee compensation is consistent with market expectations.

Elevation of Worker Voice at OG&E – SMART Milestones

The value of the worker is taken seriously at OG&E. To reflect this, we have designed milestones covering employee engagement, benefits, compensation, and safety to ensure our employees and contractors remain at the center of everything we do. The goals begin prior to the start of the Project and will be measured until project completion.

Workforce SMART Milestones	Metric
Engagement Survey Goal: OG&E engages workers and gains feedback using an engagement survey. This survey allows employees to provide feedback, express concerns, and contribute a perspective anonymously. The survey results are reviewed annually, and action is taken to improve results. Actions are developed through listening sessions which target areas of low engagement. OG&E will monitor the survey results and target a 5% improvement for lower scores (annually or across the project period).	5% Improvement in Annual Engagement Survey
Worker Voice Listening Sessions: OG&E will offer small group meetings for all employees (every employee joins at least one meeting every two years) to gather feedback on benefits and compensation. Engagement will be measured by ensuring that employees have an opportunity to participate. These meetings will be tracked annually to ensure 100% of workers have the opportunity to attend at least one meeting every two years.	100% Opportunity to Attend Annual Listening Sessions
Benefits & Compensation Goal: OG&E holds small group employee sessions open to all employees to provide education and gather feedback on benefits. Based on feedback, benefit plans are updated, or an explanation is provided to help employees understand the rationale if changes are not made. Regarding compensation, OG&E educates managers on how compensation works so that we can be more effective in helping employees understand their compensation. We ensure that we are fairly and generously compensating our employees using annual compensation surveys and utilizing tools which allow us to see the aggregate compensation amounts of others in our industry, from similar sizes and geographic areas. OG&E measures our success in this area based on employee retention with an annual voluntary turnover goal of less than 6% attrition per year.	6% or Less Voluntary Turnover Per Year Measured Annually
Pre-Job Briefings for Adaptable Grid Project Jobs: In line with similar practices conducted at OG&E, all jobs will be required to have a pre-job brief meeting, also known as a tailboard. Documented meetings will occur before each job to engage employees and contractors with the work to be performed and provide instructions for performing the work safely. The measurable goal is that tailboards will be held for 100% of project jobs. Tailboard records will be audited to confirm that meetings were held and that hazards were identified, mitigated & documented.	Every Job Will Have a Pre-Job Briefing Throughout Project Life

Project Labor Agreements

OG&E has a history of engaging with its workforce and completing large infrastructure projects on time and within budget. While the DOE prefers Project Labor Agreements (PLA) for large projects (i.e., projects over \$35M), a PLA does not apply for the Adaptable Grid Project. The labor will be completed by full-time OG&E employees or contracted suppliers that have experience supporting OG&E projects of similar complexity, on time, and within budget.

Labor Law Violations

OG&E prioritizes safety at the center of our company culture and focuses on organizational compliance with all applicable U.S. Labor Laws.

In the last two years OG&E has had 0 violations under the following applicable labor laws:



National Labor
Relations Act

Fair Labor
Standards Act

Service
Contract Act

Davis-Bacon
Act

Title VII

Civil Rights
Act

In the past two years, OG&E only had one “Other-Than-Serious” Occupational Safety and Health Administration (OSHA) violation resulting from a lack of adherence to company rules and safety standards. OG&E paid the \$2,000 penalty and quickly responded to the violation by identifying and committing multiple corrective actions to mitigate future risks. First, OG&E provided enhanced safety training for affected employees, including minimum approach distance policies and retraining with on-job briefings before commencing overhead line work at any job site. OG&E will mandate that all technicians and supervisors are retrained on the safety procedures for the type of work in which the violation was received.

Union Statement

At OG&E we strive to create an open, honest, caring, and rewarding environment where our people (“members”) are highly valued. Our members know our culture best and trust that dealing directly with Company management is in their best interest. A number of OG&E’s suppliers and contractors are unionized. We have a long history of successfully working side-by-side with unionized workers including during months long power plant outages and mutual assistance events that span the country.

Our company values include Teamwork, Transparency, Respect, Integrity, and Individual Safety & Well-Being. Additionally, our commitment to shared trust and developing our members for long-term success are stated priorities.

We have always listened and responded to our members with dignity and respect, believing that open and direct communication with our members is essential in maintaining a healthy work environment. We expect our supervisors to be at the forefront of that practice, with an open-door policy where members will be comfortable expressing their opinions and concerns.

As a result of our collaborative culture where our members have a voice and advocate for one another, OG&E has operated without a union representing our employees for more than 120 years. This is because our members have not identified a need for union representation in our workplace.

Workplace Safety Plan

The commitment to safety at OG&E starts at the highest level. OG&E’s executive leadership led the efforts to develop and administer a Safety Management Plan consistent with industry-recognized best practices. The safety plan is already integrated into OG&E’s day-to-day operations and will be implemented for all work under the Adaptable Grid Project. Our managers

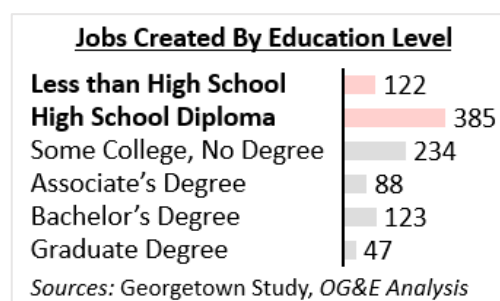
and supervisors achieve safety excellence and ensure compliance with safety programs and policies through our Safety Management System, which includes a robust audit program.

OG&E's Company-wide Safety Standard Operating Procedures (SSOPs) are a testament to our commitment to strong safety planning and processes. The procedures include step-by-step instructions to complete work in a safe manner. Employees are trained on these procedures and required to adhere to instructions pertaining to their work.

OG&E treats the safety of its contractors with the same level of seriousness that it does for internal employees. All contractors must meet safety pre-screening performance requirements prior to being hired. Each contracted company receives a Contractor Reference Guide and Supplier Code of Conduct, must meet an established safety level, and report those safety metrics.

External Job Creation

In addition to the quality jobs created internally by OG&E, the Adaptable Grid Project is expected to stimulate a wave of external jobs across the supply chain, generating significant economic growth for surrounding communities. Based on OG&E analysis of an IJIA economic impact study⁵, we estimate the \$102M project expenditure will create approximately 1,000 jobs external to OG&E, with over one-third not requiring more than a high school diploma. Job types created across the supply chain will be direct to the electric system and indirect (i.e., transportation, administration, management). By applying annual mean wages for Oklahoma and Arkansas⁶ in each job category, we estimate the 1,000 new hires will increase spend by 27%⁷ of their increase in income, resulting in an incremental economic impact of approximately \$50M over the project implementation period.



Advancing Diversity, Equity, Inclusion, and Accessibility

OG&E has built a strong foundation for DEIA and continues to track progress toward our goals across all relevant company programs. OG&E has received various awards highlighting our commitment to DEIA, including multiple awards related to Women on Boards and Minority Supplier outreach. Our efforts are anchored in the following statement:

*"We value a supportive and respectful work environment and embrace the uniqueness of each individual. By living our values and beliefs, we collectively create accountability, become a stronger, more respectful organization, and demonstrate our commitment to an inclusive work environment. Each employee, regardless of background and viewpoint, has the opportunity to contribute to the success of OGE Energy Corp. while serving and supporting the diverse communities where we live and work."*⁸

⁵ 15 million Infrastructure Jobs: An Economic Shot in the Arm to the COVID-19 Recession

⁶ Bureau of Labor Statistics

⁷ Marginal Propensity to Consume – Study from University of Pennsylvania, Wharton

⁸ [OG&E - Diversity, Equity, & Inclusion \(oge.com\)](https://www.oge.com/og&e-diversity-equity-inclusion)

We have a 5-pillar plan focused on initiatives across the DEIA landscape. Each pillar has focus areas and initiatives that will be expanded over time. The diversity milestones outlined for the Project align with the five pillars and company-wide diversity goals. We plan to incorporate goals for diversity training, supplier diversity, supplier partnerships, and high-quality community partnerships into the Project.

OG&E's 5-pillar plan develops initiatives across landscape of DEIA:



DEIA – SMART Milestones

OG&E has developed milestones for DEIA to establish accountability and create a cadence that will be monitored throughout the duration of the Adaptable Grid Project. These goals focus on internal employees assigned to the Project, third-party suppliers, and community members impacted by Project work. For supplier diversity, OG&E has set diversity spending goals, supplier outreach goals, and partnership goals. In addition to these supplier goals, we will continue to discuss with Tribal partners about the opportunity to provide materials for these projects. For employee engagement, we will mandate diversity training for all employees executing Project work. Additionally, educational resources will be available to help provide opportunities for those living in DACs to train with and, if available, work at OG&E.

DEIA SMART Milestones	Metric
DEIA in the Workplace Goal: OG&E will provide DEIA training to all employees working on the Adaptable Grid Project to drive inclusion, mutual respect, employee satisfaction, longevity, and loyalty. When hired, each OG&E employee will be assigned DEIA training. OG&E's training system will notify each employee regarding the DEIA Training and will also track, maintain records, and provide report data on completed courses. For business continuity and convenience, the DEIA training will be accessible in the office and online 24/7.	All Employees on The Project Will Take DEIA Training Annually
Supplier and Partnership Outreach Goal: OG&E will actively seek opportunities to increase our diverse supplier base. OG&E will attend events hosted by the diversity councils in the industry and others to identify at least two potential new diverse suppliers annually. This targeted effort will reduce barriers to entry by creating targeted outreach efforts to diverse suppliers.	At Least Two New Diverse Suppliers Added Annually
Supplier Diversity Goal: OG&E will set a diversity spend target of 20% to 40% of the total project spend to be sourced from diverse suppliers over the project's life. This goal will be achieved by implementing sourcing strategies and actively seeking and engaging with diverse suppliers.	20% - 40% Diverse Spend Goal for Project
Supplier Diversity Events Goal: OG&E will attend and speak at a minimum of four supplier diversity-focused events per year to increase awareness of and engagement for IJA grant opportunities among diverse suppliers. At one of the four events, OG&E will also proactively seek out and participate in at least one panel or roundtable discussion on the project topic and its potential impact on increasing diversity in the industry.	At Least Four Supplier Diversity Events Annually
DEIA Community Education Programs: Create opportunities for individuals in DACs/Tribal communities to strengthen workforce development skills. These will be done via an education program for the Adaptable Grid Project. These programs operate on an annual basis and provide internship/training opportunities to an average of 75 students over five years from our partner organizations, such as OSU-OKC, OSU-IT, OKC Public Schools, Cherokee Nation, Francis Tuttle Career Techs, and more. We plan to participate in at least 25 networking opportunities for student engagement. These programs will also offer access to full-time employment when and if demand exists. These programs will begin in the planning phase of the Project.	75+ Intern / Training Opportunities Over the Project Period
Commitment to BOD Seat with Southwest Minority Supplier Development Council (SMSDC): OG&E will maintain board membership and participation with the SMSDC and ensure increased participation between OG&E and WMBEs. As part of this commitment, we will seek out new	At Least Four SMSDC Events

business relationships with WMBEs. OG&E will commit to attend at least four events with the council per year. OG&E will continue in its capacity on the board (if offered) throughout the Project horizon.	Annually During Project
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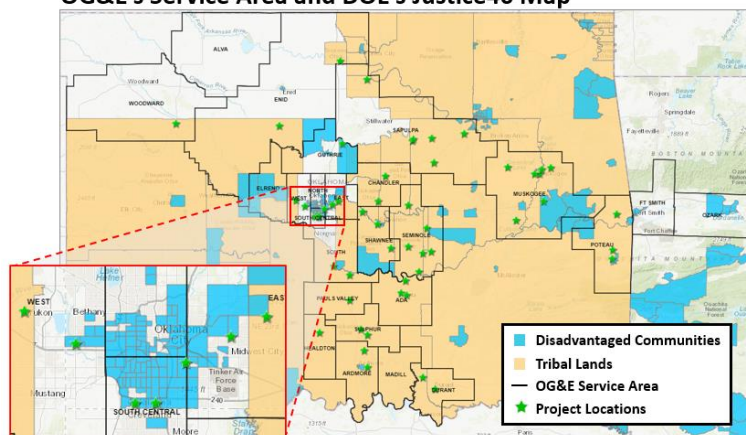
Internal DEIA Resource Groups

OG&E is committed to supporting an engaged and inclusive workforce. Employee Resource Groups (ERG) are critical to engaging our workforce and have proven successful, with 25% internal participation to date. OG&E offers numerous employee resource groups which are open to all employees. For personnel hired to support the Project, OG&E will encourage participation in ERGs and promote opportunities, time, and connections to integrate into those groups. We will tailor ERG programming to include project updates related to the Adaptable Grid Project.

Contributions to the Justice40 Initiative Goal of 40% of Benefits Flow to DACs

OG&E's service area encompasses a unique landscape with diverse customer demographics. Serving approximately 887,000 customers, OG&E provides power to hundreds of rural communities, about 150 DACs, and 19 Tribal tracts that account for 20 federally recognized tribes. Through the development of the Adaptable Grid Project approach, OG&E has pinpointed key investment areas that best meet

OG&E's Service Area and DOE's Justice40 Map



customers' needs and align with the Smart Grid Grant's goal of enhancing grid flexibility and resiliency. The Project specifically targets infrastructure within DACs and Tribal lands to directly benefit customers with the highest energy burden defined by the DOE's Justice40 Initiative. The Adaptable Grid Project exceeds Justice40 requirements by ensuring 100% of project investments will benefit customers in DACs and/or Tribal lands. Additionally, we have aligned our expected customer benefits to the Justice40 policy priorities. After extensive analysis, we have estimated the following summary of extended benefits and the time they will be delivered.

Alignment with the Justice40 Initiative Policy Priorities

OG&E's Project plan will incorporate aspects of all eight of the Justice40 policy priorities. Many of our project benefits will cover multiple Justice40 policy priorities, and some aspect of our project plan covers all priorities. Below is a summary of our high-level alignment with the policy priorities. This list is not exhaustive but highlights how we plan to impact all eight policy priorities.

- 1. Decrease energy burden in disadvantaged communities:** OG&E's project will reduce the expected customer cost of outages, reducing the energy burden of customers in DACs.
- 2. Decrease environmental exposure and burdens for disadvantaged communities:** The Project will enable the possibility to increase renewable energy (EV / DERs) to the grid, enabling this region to reduce environmental burden over time.
- 3. Increase parity in clean energy technology access and adoption in DACs:** This Project will allow the integration of clean energy technology (including EVs/DERs) in DACs based on work to make the grid more flexible and resilient.

4. **Increase access to low-cost capital in DACs:** Our proposed community benefit agreement which expands our grant office to support our Tribal partners, will help bring access to low-cost capital to our region.
5. **Increase in clean energy enterprise job creation and contracting:** We are building the foundation for our system to accommodate more renewable energy projects. As these projects are embarked on, clean energy jobs will be created.
6. **Increase clean energy jobs, pipeline, and job training:** Our proposed statewide education network will provide additional job training and pipeline opportunities within DACs. This program will connect those living in DACs to jobs enabling clean energy transition.
7. **Increase in energy resiliency:** This project was designed so that 100% of the investments will increase energy resiliency and benefit DAC/Tribal areas.
8. **Increase in energy democracy:** Our proposed benefit agreement with local charities will establish guarantees on behalf of customers with the highest level of need. This agreement will help to eliminate barriers to getting electric service.

Justice40 – SMART Milestones

Justice40 SMART Milestones	Metric
Increase in Total Dollars Spent to Benefit DAC/Tribal: Spend related to the Adaptable Grid Project is expected to be \$102M over the course of the Project, with 100% of the total project spend benefiting DAC / Tribal. Households in DACs/ Tribal lands will see the direct benefit of this spend. Spend will be tracked following the completion of project work.	100% of Project Investment Benefits DAC / Tribal
Reduction in Customer Minutes of Interruption: The Project will offer a reduction in CMI on impacted circuits and substations. This project aligns with the reliability pillar of Justice40. These reductions will be measured annually over the three-year period following the completion of all circuit work. The expected average annual reduction is more than 50,000,000 minutes ⁹ .	50M Minute Reduction in CMI on Average Annually
Reduction in Annual Energy Burden: OG&E expects to deliver a reduction of annual customer economic burden. This goal is expected to reduce the customer cost of interruption ¹⁰ related to outages by more than \$50M ¹¹ on average annually over the three-year period, which aligns with the reduction in energy burden policy priority. These benefits will be measured annually over the three-year period following the completion of all circuit work.	\$50M Reduction in Energy Burden on Average Annually
Reduction in Momentary Outages: OG&E has designed this project to reduce momentary outages in an effort to increase resiliency for customers. OG&E anticipates an average annual reduction of 300,000 momentary outages ¹² . These benefits will be measured annually over the three-year period following the completion of all circuit work.	300,000 Less Momentary Outages Annually
Increase in Community Engagement related to Justice40: OG&E will host at least 10 community stakeholder events per year in Justice40 communities. This goal aligns with the energy democracy pillar of Justice40. These events inform stakeholders of the anticipated project impacts and corresponding benefits. In addition, stakeholders will be able to help shape project outreach efforts.	At Least 10 Justice40 Focused Sessions Annually

⁹ Calculation includes SAIDI (System Average Interruption Frequency Index) with storms and is estimated based on 2019, 2020, and 2021 baseline years

¹⁰ Calculated using the DOE's ICE calculator; Due to ICE calculator limitations for long duration outages, this value is likely underestimated given that SAIDI is capped at 1,920 for ICE calculator inputs

¹¹ Figure represents the 5th year (2028) once 100% of funding is applied to project, SAIDI and SAIFI include storms and are estimated based on 2019, 2020, and 2021 baseline years

¹² This is a collective figure across all customers impacted by the investments

Keeping the Communities We Serve Updated on Justice40 and the Project

OG&E takes accountability for the Justice40 initiatives we set and will keep communities updated on the status of our goals throughout the Project. We will host roundtable discussions in areas that benefit from the Adaptable Grid Project to discuss project status, goals, and milestones related to community engagement. We will design the roundtables to be interactive, providing the opportunity for key stakeholders and community leaders to provide feedback and ask questions so our Justice40 efforts are continuously tailored to the needs of the recipients from whom they benefit.

Tracking the Projected Benefits of Justice40

OG&E used the DOE's Justice40 map to select project locations that will have the highest benefit to DACs and Tribal lands. It is expected that 100% of the project investments will benefit these areas, well exceeding the Justice40 requirement. OG&E has defined a method for quantifying the benefits for DAC and Tribal lands; further detail is provided in the SMART milestones for Justice40.

Expected Environmental Impact of Projects and Mitigation Efforts

The selected Project scope does not have any anticipated negative environmental impacts that meet the criteria outlined in the EPA's environmental screening tool, EJScreen. The tool was used to verify that the Project will not further exacerbate any underlying environmental conditions in the project's general area.

OG&E has procedures in place to assess types of environmental impacts, including but not limited to the following types: Noise, Air Quality, Water, Historical and Cultural. Regardless of the scenario, the nature of construction activity may impact the surrounding environment. Through our proven procedure, we have identified construction risks and determined the necessary mitigation measures. With the goal of leaving all Project sites in the same or improved condition, we are developing project work to include efforts to make environmental improvements where possible. We will identify potential environmental improvements, review for feasibility, and implement action into the execution of the Project.

Budget and Resources for Community Benefits Plan

OG&E makes every effort to manage cost, use of resources, and employees' time as prudently as possible. In conjunction with the CBP, OG&E expects to incur some costs to organize with community groups, meet with community members, and administer the programs. Currently, OG&E has allocated a total budget of about \$600K, which will be used to administer the CBP. In labor terms, this amount is projected to be equivalent to over 5,000 work hours for the entire project. This budget will be used for listening sessions, administering new DEIA initiatives, workforce planning, Justice40 reporting, and community outreach. The organization of a potential negotiated community benefits agreement will also receive a budget from this program and expand in scope throughout the course of the Project. The budget of this program is subject to change if additional resources are required to administer the plan.