

RECEIVED

By Office of General Counsel - Policy Division at 4:28 pm, Apr 22, 2016

April 22, 2016

Federal Election Commission
Washington, DC 20463
Via email: AO@fec.gov

RE: AO 2016-2 (Enable Midstream Services)

Enable Midstream offers the following additional information in response to questions presented during the hearing on April 14, 2016.

Seconded Employees

In Enable Midstream's 2015 10-K on file with the Securities and Exchange Commission, the company references its formal seconding agreement with OGE Energy (OGE) and CenterPoint Energy (CenterPoint). The reference agreements outline the contractual obligations of each party as they relate to seconded employees.

The 10-K states that in May 2013, Enable entered into an employee transition agreement with OGE and CenterPoint and a transitional seconding agreement with each of OGE and CenterPoint, pursuant to which they have agreed to second certain of their employees to us. Enable transitioned seconded employees from OGE and CenterPoint to the company effective January 1, 2015, except for certain employees who are participants under OGE's defined benefit and retiree medical plans. These employees will remain seconded, subject to certain termination rights of Enable and OGE. Each of the seconded employees works full time for Enable and its subsidiaries but remains employed by OGE. Enable is required to reimburse OGE for certain employment-related costs, including base salary and short- and long-term compensation costs and OGE's share of costs related to taxes, insurance and other benefit matters. Enable's reimbursement of OGE for employee costs arising out of OGE's defined benefit and retiree medical plans is fixed at \$6 million in 2016, \$5 million in 2017, and at actual cost subject to a cap of \$5 million in 2018 and thereafter, in the event of continued secondment. Enable's 2015 total compensation to OGE for seconded employees was approximately \$35 million.

In addition, please see attached chart detailing the positions of seconded employees that also includes information on seconded employees' retirement eligibility.

Divergent Business Interests

As we consider potential divergent interest, here are a few examples of where we may differ from OGE.

Unregulated versus regulated:

Simply stated, unregulated businesses are riskier than those that are regulated. At OGE, the Oklahoma Corporation Commission, the Arkansas Public Service Commission and the Federal Energy Regulatory Commission serve as a replacement for the competitive market. These commissions determine how much the utility can charge and what its profit margin can be. Conversely, Enable operates in the highly

competitive midstream sector of the natural gas industry. While interstate natural gas transportation rates are regulated by the FERC, Enable operates primarily in the unregulated space where earnings are volatile and subject to a variety of market and environmental factors that do not weigh as heavily in the regulated utility space. These differences have the potential to create divergent business interests.

Boiler fuel choice

Most of the electricity generated in the U.S. is created by burning fossil fuels. For decades, the primary fuel source has been coal. Electric utilities like OGE have an economic interest in extending the life of coal-fired generation. We at Enable would counter that building or converting to natural gas-fired generation would be the more environmentally friendly option for baseload generation. These positions create potential policy conflicts.

Renewable energy versus natural gas-fired generation

While wind and solar energy help to reduce carbon dioxide emissions, they fail to provide the level of baseload generation necessary to support reliable electricity delivery. Natural gas-fired generation should be the fuel of choice in supplementing the growth in renewables.

**As of April 20, 2016, 164 OGE Energy employees are seconded to Enable Midstream.
 Seconded employees represent approximately 9 percent of the Enable workforce
 As of April 30, 2016, approximately 70 percent will be retirement eligible.**

Position	Status	Role
O&M Tech Senior, Plant	Seconded Non Exempt	Individual Contributor
O&M Tech Senior, Plant	Seconded Non Exempt	Individual Contributor
O&M Tech Lead, Mechanical	Seconded Non Exempt	Individual Contributor
O&M Tech Senior, Plant	Seconded Non Exempt	Individual Contributor
O&M Tech Lead, Mechanical	Seconded Non Exempt	Individual Contributor
O&M Tech Senior, Pipeline	Seconded Non Exempt	Individual Contributor
O&M Tech Senior, Pipeline	Seconded Non Exempt	Individual Contributor
Lead Compression Diagnostic Technician	Seconded Non Exempt	Individual Contributor
O&M Tech Lead, Pipeline	Seconded Non Exempt	Individual Contributor
Materials Specialist IV	Seconded Non Exempt	Individual Contributor
O&M Tech Lead, Measurement	Seconded Non Exempt	Individual Contributor
O&M Tech Senior, Pipeline	Seconded Non Exempt	Individual Contributor
O&M Tech Senior, Mechanical	Seconded Non Exempt	Individual Contributor
O&M Tech Senior, Plant	Seconded Non Exempt	Individual Contributor
Lead Compressor Specialist	Seconded Non Exempt	Individual Contributor
Lead Compressor Specialist	Seconded Non Exempt	Individual Contributor
Lead Diagnostic & Compressor Specialist	Seconded Non Exempt	Individual Contributor
Lead CMF Compressor Technician	Seconded Non Exempt	Individual Contributor
O&M Tech Lead, Mechanical	Seconded Non Exempt	Individual Contributor
CMF Compressor Technician V	Seconded Non Exempt	Individual Contributor
O&M Tech Senior, Plant	Seconded Non Exempt	Individual Contributor
O&M Tech Lead, Measurement	Seconded Non Exempt	Individual Contributor
O&M Tech Lead, Pipeline	Seconded Non Exempt	Individual Contributor
Materials Specialist IV	Seconded Non Exempt	Individual Contributor
O&M Tech IV, Measurement	Seconded Non Exempt	Individual Contributor
Operations Administrator III	Seconded Non Exempt	Individual Contributor
O&M Tech Lead, Pipeline	Seconded Non Exempt	Individual Contributor
O&M Tech Lead, Measurement	Seconded Non Exempt	Individual Contributor
O&M Tech Lead, Mechanical	Seconded Non Exempt	Individual Contributor
O&M Tech Senior, Measurement	Seconded Non Exempt	Individual Contributor
O&M Tech Senior, Mechanical	Seconded Non Exempt	Individual Contributor
O&M Tech Senior, Pipeline	Seconded Non Exempt	Individual Contributor
O&M Tech Senior, Corrosion	Seconded Non Exempt	Individual Contributor
O&M Tech Lead, Pipeline	Seconded Non Exempt	Individual Contributor
Operations Administrator III	Seconded Non Exempt	Individual Contributor
Senior Emissions Analysis Technician	Seconded Non Exempt	Individual Contributor
O&M Tech Lead, Mechanical	Seconded Non Exempt	Individual Contributor
O&M Tech Lead, Measurement	Seconded Non Exempt	Individual Contributor
Lead CMF Compressor Technician	Seconded Non Exempt	Individual Contributor
O&M Tech Senior, Measurement	Seconded Non Exempt	Individual Contributor
O&M Tech Senior, Pipeline	Seconded Non Exempt	Individual Contributor
O&M Tech Senior, Pipeline	Seconded Non Exempt	Individual Contributor
O&M Tech Lead, Mechanical	Seconded Non Exempt	Individual Contributor
Measurement Data Analyst IV	Seconded Non Exempt	Individual Contributor

Senior System Controller	Seconded Non Exempt	Individual Contributor
Senior System Controller	Seconded Non Exempt	Individual Contributor
Senior Measurement Data Analyst	Seconded Non Exempt	Individual Contributor
Measurement Data Analyst IV	Seconded Non Exempt	Individual Contributor
System Controller IV	Seconded Non Exempt	Individual Contributor
O&M Tech Lead, I&E	Seconded Non Exempt	Individual Contributor
O&M Tech Senior, Corrosion	Seconded Non Exempt	Individual Contributor
O&M Tech Lead, Measurement	Seconded Non Exempt	Individual Contributor
Lead SCADA I&E Technician	Seconded Non Exempt	Individual Contributor
O&M Tech Lead, Pipeline	Seconded Non Exempt	Individual Contributor
O&M Tech Senior, Mechanical	Seconded Non Exempt	Individual Contributor
O&M Tech Senior, Plant	Seconded Non Exempt	Individual Contributor
O&M Tech Senior, Plant	Seconded Non Exempt	Individual Contributor
O&M Tech Lead, Pipeline	Seconded Non Exempt	Individual Contributor
O&M Tech Lead, Mechanical	Seconded Non Exempt	Individual Contributor
O&M Tech Senior, Pipeline	Seconded Non Exempt	Individual Contributor
O&M Tech Senior, Corrosion	Seconded Non Exempt	Individual Contributor
Senior SCADA I&E Technician	Seconded Non Exempt	Individual Contributor
O&M Tech Lead, Mechanical	Seconded Non Exempt	Individual Contributor
O&M Tech Lead, Pipeline	Seconded Non Exempt	Individual Contributor
O&M Tech Senior, Pipeline	Seconded Non Exempt	Individual Contributor
O&M Tech Lead, Measurement	Seconded Non Exempt	Individual Contributor
O&M Tech Lead, Pipeline	Seconded Non Exempt	Individual Contributor
Director, Compression Operations	Seconded Exempt	Director
Director, Project Controls & Admin	Seconded Exempt	Director
Director, Environmental	Seconded Exempt	Director
Director, PSM & RMP Programs	Seconded Exempt	Director
Director, ROW & Land Management	Seconded Exempt	Director
Director, Natural Gas /Imbalance	Seconded Exempt	Director
Director, Project Development	Seconded Exempt	Director
VP Communications and Government Affairs	Seconded Exempt	Executive Level
Construction Inspector	Seconded Exempt	Individual Contributor
Senior Construction Manager	Seconded Exempt	Individual Contributor
Construction Inspector	Seconded Exempt	Individual Contributor
Senior Systems Control Coordinator	Seconded Exempt	Individual Contributor
Lead SCM Systems Analyst	Seconded Exempt	Individual Contributor
Buyer	Seconded Exempt	Individual Contributor
Staff Accountant	Seconded Exempt	Individual Contributor
Lead Contract Analyst	Seconded Exempt	Individual Contributor
Lead Portfolio Analyst	Seconded Exempt	Individual Contributor
Commercial G&P Asset Manager	Seconded Exempt	Individual Contributor
Senior Contract Administrator	Seconded Exempt	Individual Contributor
Lead Measurement System Analyst	Seconded Exempt	Individual Contributor
Natural Gas Marketing Director	Seconded Exempt	Individual Contributor
Accountant	Seconded Exempt	Individual Contributor

**As of April 20, 2016, 164 OGE Energy employees are seconded to Enable Midstream.
 Seconded employees represent approximately 9 percent of the Enable workforce
 As of April 30, 2016, approximately 70 percent will be retirement eligible.**

Senior Scheduling Rep - NGL	Seconded Exempt	Individual Contributor
NGLs Marketing Director	Seconded Exempt	Individual Contributor
Lead Scheduling Rep - G&P	Seconded Exempt	Individual Contributor
Lead Scheduling Rep - G&P	Seconded Exempt	Individual Contributor
Lead Engineer, Integrity Management	Seconded Exempt	Individual Contributor
Lead Market Analyst	Seconded Exempt	Individual Contributor
Senior Systems Analyst	Seconded Exempt	Individual Contributor
Measurement System Analyst	Seconded Exempt	Individual Contributor
Lead Contract Analyst	Seconded Exempt	Individual Contributor
Lead Systems Analyst	Seconded Exempt	Individual Contributor
Lead, G&P Commercial Asset Manager	Seconded Exempt	Individual Contributor
Business Systems Specialist	Seconded Exempt	Individual Contributor
Well Connect Analyst	Seconded Exempt	Individual Contributor
Senior Accountant	Seconded Exempt	Individual Contributor
Senior Scheduling Rep - G&P	Seconded Exempt	Individual Contributor
Financial Marketing Director	Seconded Exempt	Individual Contributor
Senior Cost Compliance Analyst	Seconded Exempt	Individual Contributor
Lead Performance Specialist	Seconded Exempt	Individual Contributor
Senior Credit Risk Analyst	Seconded Exempt	Individual Contributor
Senior Credit Risk Analyst	Seconded Exempt	Individual Contributor
Senior Risk Analyst	Seconded Exempt	Individual Contributor
Business Systems Specialist	Seconded Exempt	Individual Contributor
Natural Gas Marketing Director	Seconded Exempt	Individual Contributor
Natural Gas Marketing Director	Seconded Exempt	Individual Contributor
Senior Accountant	Seconded Exempt	Individual Contributor
Lead Health & Safety Field Coordinator	Seconded Exempt	Individual Contributor
Senior Field Operations Analyst	Seconded Exempt	Individual Contributor
Senior System Planner	Seconded Exempt	Individual Contributor
Senior System Planner	Seconded Exempt	Individual Contributor
Manager, Compression Services	Seconded Exempt	Manager
Manager, Compression Maint Facility	Seconded Exempt	Manager
Regional Processing Manager, South	Seconded Exempt	Manager
Regional Processing Manager, West	Seconded Exempt	Manager
Manager, System Control	Seconded Exempt	Manager
Manager, Risk Reporting	Seconded Exempt	Manager
Manager, HR Services	Seconded Exempt	Manager
Manager, Accounting	Seconded Exempt	Manager
Regional Processing Manager, East	Seconded Exempt	Manager
Sr Director, Measurement Data Processes	Seconded Exempt	Senior Director
Senior Director, Commercial G&P	Seconded Exempt	Senior Director
Senior Director, Marketing, Sales & Risk	Seconded Exempt	Senior Director
Senior Director, Tax	Seconded Exempt	Senior Director
Senior Director, Envirn Health & Safety	Seconded Exempt	Senior Director
Senior Director, Comp/Plant Services	Seconded Exempt	Senior Director
Senior Manager, Treasury Operations	Seconded Exempt	Senior Manager

Senior Manager, Scheduling - NGL/Crude	Seconded Exempt	Senior Manager
Senior Manager, Credit Risk	Seconded Exempt	Senior Manager
Senior Manager, Accounting	Seconded Exempt	Senior Manager
Senior Manager, SCADA	Seconded Exempt	Senior Manager
O&M Leader	Seconded Exempt	Supervisor
O&M Leader	Seconded Exempt	Supervisor
O&M Leader	Seconded Exempt	Supervisor
O&M Leader	Seconded Exempt	Supervisor
O&M Leader	Seconded Exempt	Supervisor
O&M Leader	Seconded Exempt	Supervisor
Senior Operations Coordinator	Seconded Exempt	Supervisor
Senior Operations Coordinator	Seconded Exempt	Supervisor
O&M Leader	Seconded Exempt	Supervisor
O&M Leader	Seconded Exempt	Supervisor
O&M Leader	Seconded Exempt	Supervisor
O&M Leader	Seconded Exempt	Supervisor
O&M Leader	Seconded Exempt	Supervisor
O&M Leader	Seconded Exempt	Supervisor
O&M Leader	Seconded Exempt	Supervisor
O&M Leader	Seconded Exempt	Supervisor
O&M Leader	Seconded Exempt	Supervisor
O&M Leader	Seconded Exempt	Supervisor
O&M Leader	Seconded Exempt	Supervisor
Supervisor, Accounting - Commodity	Seconded Exempt	Supervisor
Supervisor, Measurement	Seconded Exempt	Supervisor
Supervisor, Accounting	Seconded Exempt	Supervisor
O&M Leader	Seconded Exempt	Supervisor
Senior Operations Coordinator	Seconded Exempt	Supervisor
O&M Leader	Seconded Exempt	Supervisor
O&M Leader	Seconded Exempt	Supervisor
O&M Leader	Seconded Exempt	Supervisor