

November 9, 2021

Mr. Ethan Carrier  
General Counsel  
New York City Conflicts of Interest Board  
2 Lafayette Street, Suite 1010  
New York, NY 10007

RE: Post-Employment Retention of Susan Cohen as a Consultant to DCAS pursuant to Conflicts of Interest Board Rule Section 1-07(d)(1)

Dear Mr. Carrier:

I write to request your approval to retain Susan Cohen, Assistant Commissioner, Energy Supply at the NYC Department of Citywide Administrative Services (“DCAS”) as a consultant from November 22, 2021 to December 31, 2022. Ms. Cohen will be retiring from DCAS on November 19, 2021. If approved, she will temporarily resume her duties and responsibilities at DCAS to work on matters with which she has been personally and substantially involved. Ms. Cohen’s retention is necessary to complete critical work in energy supply procurement and energy budget development.

In particular, under the consulting arrangement, Ms. Cohen will ensure the completion of essential projects, including assisting with the New York Power Authority (“NYPA”) Long Term Energy Supply negotiation and development of the FY22 Heat, Light, and Power budget. Ms. Cohen is uniquely qualified to serve and requires no training. She has been an Assistant Commissioner for over 14 years and her institutional and technical knowledge, and subject matter expertise are not otherwise available among other employees to immediately fulfill the role.

Under COIB Rule 1-07(d)(1), a public servant may continue to serve as a compensated consultant to the agency by which she was formerly employed to work on matters with which she was personally and substantially involved subject to the following conditions:

- (1) the consulting arrangement is made for the purpose of continuing or completing work left unfinished by the former public servant at the time their City service terminated, or for training their replacement, or for filling a vacancy until a replacement can be hired;
- (2) the duration of the consulting arrangement is no longer than reasonably necessary;
- (3) the former public servant has technical, professional, or other subject-matter expertise or skills not otherwise available among the agency’s employees;
- (4) the compensation is comparable to what the former public servant last earned at the agency; and

(5) within 30 days the written approval of the agency head is disclosed to the Conflicts of Interest Board, which approval will be posted on the Board's website.

Ms. Cohen will not consult or work for any other outside entities. Under the consulting agreement, Ms. Cohen will be compensated at a rate of \$100 per hour. Ms. Cohen's work hours will vary based on project needs but her total earnings will be comparable to her current annual salaried rate.

I believe that the consulting arrangement described above meets the standard of approval required by Rule 1-07(d)(1). Please let me know if you need any additional information.

Very truly yours,



Lisette Camilo