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To: [KLINE, Dave](#); bmeadors@southernco.com
Cc: [Gott, William](#); [Smith, Will](#); [Zaleski, Brian](#); [Khanna, Meena](#); [Doyle, Daniel](#); [Benowitz, Howard](#)
Subject: Lunchtime Drop-In = Part 26 and Incorporation By Reference
Date: Monday, September 19, 2016 1:29:00 PM

Dave and Brian,




Thank you for dropping in at the lunch table with Howard and I to discuss options to help prevent recurrent rulemaking to update Part 26 drug testing provisions with those detailed in the HHS guidelines for federal workplace drug testing programs. Three options discussed: (1) full industry commitment to the Guidelines in their Security Plans; (2) IBR via the 49 CFR Part 40 provisions; and, (3) amendment of the Energy Policy Act or some other congressional tool.

I note that no regulatory decisions or commitments were made.

R,
Paul

Paul Harris

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