



PPL companies

**LOUISVILLE GAS AND ELECTRIC COMPANY
KENTUCKY UTILITIES COMPANY**

**STANDARDS OF CONDUCT FOR
TRANSMISSION PROVIDERS
WRITTEN PROCEDURES**

VERSION 8 - UPDATED EFFECTIVE August 1, 2019

Standards of Conduct for Transmission Providers Written Procedures

Procedure Title

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Required Approval Signatures

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Date: 7/25/19

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Date: 7/25/19



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Date: 7-25-19

REVISION PAGE

Revision or Change Number	Effective Date	Affected Page Numbers	Description of Revision/Change
<p style="text-align: center;">1</p> <p>*Earlier versions exist but were not numbered</p>	11/1/10	2, 4, 7, 8, 11, 12, 16, 17, 21, 22, 23	<p>Removed references to E.ON US throughout; updated reporting methods; updated Transmission Function and Shared Personnel definitions; updated language related records availability; updated list of activities that require employees to be treated as Transmission Function Employees; updated procedures for employee transfers; updated Implementation Measures, Tariff Waiver Log, Documentation of Tariff Discounts, and Documentation of Emergency Conditions sections; other minor changes made to correct errors and improve readability.</p>
2	8/31/11	1, 3, 9, 18, 19	<p>Updated references to administrator of OATT; updated OASIS link; clarified purpose of securing books and records; other minor changes made to correct errors and improve readability.</p>
3	11/19/12	1, 5, 13, 25	<p>Updated to reflect current ITO; updated examples of Transmission Function Information; deleted language related to certain types information sharing; updated approver names and titles; other minor changes to correct errors and improve readability.</p>
4	11/10/14	1, 3, 10, 11, 14, 15, 17, 22	<p>Reformatted to add a cover page and table of contents; updated the shared facilities listing; defined the term “Emergency Conditions”; updated transmission system information records storage requirement; updated definition of, and requirements for, cross-functional meetings; expanded language related to protecting non-public transmission function information from being accessible by MFEs; clarified responsibilities for notifications related to employee hires or transfers.</p>

5	6/1/15	7, 8	Updated references to MFEs as a result of the Talen spin-off.
6	11/1/16	12	Expanded notification requirements for employee transfers.
7	8/28/18	2, 3, 4, 5, 6, 7, 13-14, 20	Updated approver names and titles; reformatted to add a revision page; updated SOC Chief Compliance Officer information; deleted cross-functional meeting requirements in Section IV(E); other minor changes made to correct errors and improve readability.
8	8/1/19	11, 15-16	Updated section title; added guidance on cross-functional meetings to Section IV(E); other minor changes made to correct errors and improve readability.

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**LOUISVILLE GAS AND ELECTRIC COMPANY
KENTUCKY UTILITIES COMPANY
STANDARDS OF CONDUCT FOR TRANSMISSION PROVIDERS
WRITTEN PROCEDURES**

I. INTRODUCTION.

Louisville Gas and Electric Company and Kentucky Utilities Company (collectively, the “**Companies**”), through their ownership and operation of certain electric transmission facilities used in interstate commerce, are “**Transmission Providers**” required to comply with the regulations promulgated by the Federal Energy Regulatory Commission (the “**Commission**”) in *Standards of Conduct for Transmission Providers*, Order No. 717, 125 FERC ¶ 61,064 (2008)(“*Standards of Conduct*”). The regulations implementing the *Standards of Conduct* are codified at 18 C.F.R. Part 358 (2008).

Although the Companies each own separate transmission facilities, these facilities are jointly operated as a single, integrated electric transmission system (the “**Transmission System**”). All service over the Transmission System is provided by the Companies on a non-discriminatory basis in accordance with the terms and conditions of their Open Access Transmission Tariff (“**OATT**”), as such may be amended, revised or supplemented from time-to-time. The OATT is independently administered by TranServ International, Inc. (“TranServ”), in its role as an Independent Transmission Organization (“**ITO**”).¹ As used herein, “TranServ” and “ITO” shall also be intended to reference any successor to TranServ International, Inc. as administrator of the OATT.

These written procedures (“**Standards of Conduct Written Procedures**”) reflect the Companies’ ongoing commitment to comply with the *Standards of Conduct* and the guidance set forth in Commission’s Policy Statement on Compliance.² The Companies reserve the right to amend, interpret or construe these procedures, and their application, in accordance with developments in regulatory or industry guidance, practices or requirements. Specifically, these procedures advance the two fundamental principles of the *Standards of Conduct*:

- All Transmission Function Employees shall function independently from Marketing Function Employees.
- The Companies shall treat all customers taking open access transmission service over the Transmission System on a not unduly discriminatory basis, and shall refrain from operating the Transmission System in a manner that would otherwise provide an undue preference to any person.

All inquiries regarding the *Standards of Conduct* or these Standards of Conduct Written Procedures should be directed to **Jay W. Warren**, Director Compliance and Senior Counsel and FERC Standards of Conduct Chief Compliance Officer or his authorized designee(s) (hereinafter, the

¹ *Louisville Gas & Electric Company, et al.*, 114 FERC ¶ 61,282, *order on reh'g*, 116 FERC ¶ 61,020 (2006).

² *Compliance with Statutes, Regulations and Orders*, Policy Statement on Compliance, 125 FERC ¶ 61,058 (2008).

“SOC Chief Compliance Officer”). The contact information for the SOC Chief Compliance Officer is as follows:

By mail: Jay W. Warren
Director Compliance and Senior Counsel and
FERC Standards of Conduct Chief Compliance Officer
LG&E and KU Services Company
220 West Main Street
Louisville, Kentucky 40202

By telephone: (502) 627-3203

By e-mail: jay.warren@lge-ku.com

Employees may also report any Standards of Conduct issues or concerns through the LG&E and KU Energy LLC Helpline at (800) 407-7185 or the PPL Corporation Ethics Helpline at (800) 550-9418. If desired, reports to the LG&E and KU Energy LLC Helpline or the PPL Corporation Ethics Helpline may be made anonymously. However, employees reporting anonymously should provide sufficient detail for the Companies to conduct an informed inquiry into their concerns.

The Companies take their responsibility for promoting full compliance with the *Standards of Conduct* very seriously. Employees may contact the SOC Chief Compliance Officer directly for purposes of: (1) seeking guidance regarding the scope, application, meaning or intent of the *Standards of Conduct*; and (2) reporting an existing or potential violation of the *Standards of Conduct*, including a failure to comply with these Standards of Conduct Written Procedures. If a potential *Standards of Conduct* issue is identified, employees should contact the SOC Chief Compliance Officer and seek guidance before taking any actions that could result in a violation of the *Standards of Conduct* and these Standards of Conduct Written Procedures.

ANY PERSON WITH KNOWLEDGE OR CONCERNS REGARDING ACTIVITIES THAT MAY HAVE RESULTED, OR COULD RESULT, IN A VIOLATION OF THE STANDARDS OF CONDUCT AND/OR THESE STANDARDS OF CONDUCT WRITTEN PROCEDURES IS EXPECTED AND REQUIRED TO REPORT THEM TO THE SOC CHIEF COMPLIANCE OFFICER WITHOUT DELAY. THERE WILL BE NO RETRIBUTION FOR REPORTS MADE IN GOOD FAITH.

ANY PERSON DETERMINED TO HAVE ENGAGED IN A VIOLATION OF STANDARDS OF CONDUCT AND/OR THESE STANDARDS OF CONDUCT WRITTEN PROCEDURES MAY BE SUBJECT TO SANCTION INCLUDING, BUT NOT LIMITED TO, DISCIPLINARY ACTION, DISCHARGE OR, WHERE APPROPRIATE, POTENTIAL CIVIL AND/OR CRIMINAL SANCTIONS.

II. PUBLIC AVAILABILITY OF STANDARDS OF CONDUCT COMPLIANCE INFORMATION.

The *Standards of Conduct* regulations require the Companies to make the Standards of Conduct Written Procedures and certain other related *Standards of Conduct* compliance information publicly available without restriction by posting them either on an Open Access Same-Time Information System (“OASIS”) operated by, or on behalf of the Companies, or on the Internet. In compliance with this requirement, it is the current intention of the Companies, except as noted below, that the Standards of Conduct Written Procedures and other applicable *Standards of Conduct* compliance information be posted on LG&E and KU Energy LLC’s Internet website (hereinafter the “**LG&E and KU Energy LLC Website**”). The LG&E and KU Energy LLC Website is publicly available without restriction.

Also, certain limited *Standards of Conduct* compliance information will be posted on the Companies' designated page on the OASIS website maintained by TranServ (hereinafter the "OASIS").

Please note that the *Standards of Conduct* compliance information posted on the LG&E and KU Energy LLC Website may contain links directing users to the OASIS for the information described above. The OASIS is publicly available to appropriate users. Similarly, the OASIS may contain links directing users to the LG&E and KU Energy LLC Website for selected information.

III. SCOPE AND APPLICATION OF STANDARDS OF CONDUCT WRITTEN PROCEDURES.

These Standards of Conduct Written Procedures set forth the rules and procedures governing the interactions between employees of the Companies designated as Transmission Function Employees and employees of the Companies and their affiliates designated as Marketing Function Employees. The *Standards of Conduct* regulations contain several key definitions, terms, and concepts which have been fully incorporated in these Standards of Conduct Written Procedures. In order to assist employees in understanding the scope and application of these Standards of Conduct Written Procedures, certain of these definitions, terms, and concepts are discussed below.

A. TRANSMISSION.

The *Standards of Conduct* regulations define, in relevant part, the term "**Transmission**" as "electric transmission, network or point-to-point service, ancillary services or other methods of electric transmission, or the interconnection jurisdictional transmission facilities under this part 35" and "natural gas transportation, storage, exchange, backhaul, or displacement service provided under subparts B or G of part 284" of the Commission regulations.

B. TRANSMISSION FUNCTIONS.

The *Standards of Conduct* regulations define the term "**Transmission Functions**" as "the planning, directing, organizing or carrying out of day-to-day transmission operations, including the granting or denying of transmission service requests." The phrase "day-to-day operations" in this definition is interpreted by the Commission as meaning short-term, real-time transmission system operations, including decisions made in advance of real-time but directed at such real-time operations. In addition to granting or denying requests for transmission service, the following activities are Transmission Functions:

1. Coordinating the actual physical flows of power or gas;
2. Isolating portions of the system to prevent cascades; and
3. Imposing transmission loading relief procedures.

Long range transmission planning and strategic activities, including, but not limited to, integrated resource planning, are not Transmission Functions, so long as these activities do not implicate the day-to-day operation of the Transmission System. Balancing authority activities that are performed separate and apart from activities involving the day-to-day operation of the Transmission System are not Transmission Functions. Transmission rate design activity, in and of itself, is not a Transmission Function.

C. TRANSMISSION FUNCTION EMPLOYEE.

The *Standards of Conduct* regulations define the term “**Transmission Function Employee**” as “an employee, contractor, consultant or agent of a transmission provider who actively and personally engages on a day-to-day basis in transmission functions.” (A list of the job titles and job descriptions of the Companies’ Transmission Function Employees is posted on the LG&E and KU Energy LLC Website or OASIS (as applicable)).

D. TRANSMISSION FUNCTION INFORMATION.

The *Standards of Conduct* regulations broadly define the term “**Transmission Function Information**” as “information relating to transmission functions.” As noted above, “Transmission Functions” are “the planning, directing, organizing, or carrying out of day-to-day transmission operations, including the granting or denying of transmission service requests”. Accordingly, Transmission Function Information is limited to information related to those defined Transmission Functions. Transmission Function Information covered by the *Standards of Conduct*, includes, but is not limited to, the following types of information:

1. Available transmission capability/rating information;
2. Transmission operating data;
3. Transmission equipment/facility status;
4. Transmission curtailments; and
5. Transmission customer information.

The definition of Transmission Function Information includes both public and non-public information. However, the scope and application of the *Standards of Conduct* is specifically limited to **NON-PUBLIC** Transmission Function Information.

E. MARKETING FUNCTIONS.

The *Standards of Conduct* regulations adopt two definitions for the term “**Marketing Functions**.” Because the Companies engage in power sales and the Louisville Gas and Electric Company occasionally engages in wholesale sales of natural gas through its local gas distribution business unit, each definition is addressed immediately below.

1. DEFINITION OF MARKETING FUNCTIONS APPLICABLE TO ELECTRIC OPERATIONS.

The *Standards of Conduct* regulations define Marketing Functions as “the sale for resale in interstate commerce, or the submission of offers to sell in interstate commerce, of electric energy or capacity, demand response, virtual transactions, financial or physical transmission rights, all as subject to the exclusion for bundled retail sales....” (Sales for resale of ancillary services to third-parties, including sales into a competitive wholesale energy market administered by regional transmission organization/independent system operator are Marketing Functions. However, the process of making transmission reservations and the scheduling of open access transmission service are not a Marketing Functions.)

2. DEFINITION OF MARKETING FUNCTIONS APPLICABLE TO NATURAL GAS OPERATIONS.

The *Standards of Conduct* regulations define Marketing Functions as “the sale for resale in interstate commerce, or the submission of offers to sell in interstate commerce, natural gas, subject to the following exclusions:

1. Bundled retail sales;
2. Incidental purchases or sales of natural gas to operate interstate natural gas pipeline transmission facilities;
3. Sale of natural gas solely from a seller's own production or solely from a seller's own gathering or processing facilities; and
4. Sales by an intrastate natural gas pipeline, by a Hinshaw intrastate pipeline exempt from the Natural Gas Act, or by a local distribution company making an on-system sale."

F. MARKETING FUNCTION EMPLOYEES.

The *Standards of Conduct* regulations define "**Marketing Function Employee**" as an "employee, contractor, consultant or agent of the transmission provider or of an affiliate of a transmission provider who actively and personally engages on a day-to-day basis in marketing functions."

A list of the names and addresses of the Companies' affiliates that employ or retain Marketing Function Employees is posted on the LG&E and KU Energy LLC Website or OASIS (as applicable).³

G. LG&E AND KU SERVICES COMPANY EMPLOYEES AND EMPLOYEES OF OTHER AFFILIATES.

Certain officers and directors, corporate support staff, and certain other operational and non-operational personnel employed by LG&E and KU Services Company ("**ServCo**"), or any other affiliates of the Companies may be assigned to a position designated as a Transmission Function Employee and Marketing Function Employee for Standards of Conduct compliance purposes.⁴ ServCo employees assigned to a Transmission Function Employee position are subject to, and shall comply with, the provisions of the *Standards of Conduct* and these Standards of Conduct Written Procedures applicable to Transmission Providers and their Transmission Function Employees. Servco employees assigned to a Marketing Function Employee position shall comply with any provision of the *Standards of Conduct* and these Standards of Conduct Written Procedures applicable to Marketing Function Employees.

H. SHARED PERSONNEL.

For purposes of these Standards of Conduct Written Procedures, the term "**Shared Personnel**" shall include all personnel, including officers and directors, directly employed by the Companies, ServCo or any other affiliate of PPL that are assigned, dedicated, or working on behalf of the Companies or their affiliates, and that are **NOT** assigned to a designated Marketing Function Employee or Transmission Function Employee position. Shared Personnel are required to comply with the No Conduit Rule at all times. (See Section V of these Standards of Conduct Written Procedures)

³ LG&E/KU is advised and understands that PPL Electric Utilities Corporation's ("PPLEU") current and anticipated provider-of-last-resort practices (POLR) do not constitute a marketing function or involve marketing function personnel. Should such POLR practices change, the Companies and PPLEU will consider the effect of such changes under the Standards of Conduct and/or these Written Procedures.

⁴ ServCo (as a corporate entity) does not engage in Marketing Functions or Transmission Functions for: (1) its own benefit; or (2) the benefit of any affiliate in the PPL Corporation corporate family.

IV. PROTOCOLS AND PROCEDURES IMPLEMENTING THE INDEPENDENT FUNCTIONING RULE.

A fundamental rule of the *Standards of Conduct* requires that, except in permitted circumstances, Transmission Function Employees must function independently from Marketing Function Employees. To satisfy this requirement, the Companies are required to ensure the structural separation and independent operation of their Transmission Function Employees from Marketing Function Employees. As set forth in Section III.H, above, Shared Personnel may not act as a conduit for purposes of conveying non-public Transmission Function Information to Marketing Function Employees.

A. SEPARATION OF FUNCTIONS AND INDEPENDENT FUNCTIONING; GENERALLY.

1. Structural Separation. The LG&E and KU Energy LLC Transmission System is operated from two transmission system control centers (the “**Transmission System Operating Centers**”). The Transmission System Operating Centers are the only facilities used by the Companies to operate the Transmission System.
 - a. Physical Separation. The Transmission System Operating Centers are physically separate and distinct from the facilities used to house Marketing Function Employees.
 - b. Shared Facilities. Transmission Function Employees do not share common work facilities with Marketing Function Employees, except for certain Transmission Function Employees whose work space is located at 220 West Main Street, Louisville, Kentucky. This same location houses Marketing Function Employees, although work facilities are appropriately segregated. Additionally, the Broadway Office Complex, located at 820 West Broadway, Louisville, Kentucky houses certain Transmission Function Employees, and serves as a back-up work location for Marketing Function Employees.
 - c. Compliance Obligations if Facilities Shared in Future. If, at any time, Transmission Function Employees and Marketing Function Employees are housed in or share other common work facilities, the SOC Chief Compliance Officer shall ensure that appropriate card reader or key pad security systems or other suitable methods are installed to restrict Marketing Function Employees from accessing the portion of such shared facilities used for Transmission Functions. In addition, the SOC Chief Compliance Officer shall post consistent with FERC requirements a complete list of any such shared facilities, including the types of facilities shared and their respective addresses.
2. Independent Functioning. The Companies’ Transmission Function Employees are distinct from and operate independently of Marketing Function Employees.
 - a. Generally. Marketing Function Employees are prohibited from conducting Transmission Functions and Transmission Function Employees are prohibited from conducting marketing functions.
 - b. Physical Access to Transmission System Operating Centers Restricted. Marketing Function Employees’ ability to access the Transmission System Operating Centers is restricted through the use of card reader and electronic keypad or other suitable security systems.

- Marketing Function Employees shall not be permitted access to the Transmission System Operating Centers in a manner that differs materially from terms and conditions upon which all other Transmission Customers are permitted access to such facilities. This rule shall remain in full force and effect twenty-four (24) hours/day, seven (7) days/week, and 365 days/year.
 - Absent permitted exceptions, such as Emergency Conditions, Marketing Function Employees that require access to the Transmission System Operating Centers shall submit a written or email request to the SOC Chief Compliance Officer setting forth: (1) the proposed date and time that access to the Transmission System Operating Centers is required; and (2) a verifiable and legitimate business purpose for seeking access to such facilities. The SOC Chief Compliance Officer shall review the request as promptly as possible and approve or deny the request. The SOC Chief Compliance Officer shall maintain a written record of each such decision.
 - For purposes of these Standards of Conduct Written Procedures, “**Emergency Conditions**” shall include conditions affecting system reliability, earthquake, fire, weather, or other severe disruptions of the Transmission provider’s normal business operations.
 - The Companies shall maintain a log at each Transmission System Operating Center for purposes of documenting the instances in which any visitor, whether Marketing Function Employees, or a representative(s) of an unaffiliated third-party, visits these facilities.
 - The Companies shall maintain the visitor logs for a period of five (5) years.
3. Books and Records. The Companies shall maintain all books and records relating to the operation of the Transmission System separately from those maintained by internal functionalized business units or affiliates that employ or retain Marketing Function Employees.

B. GUIDANCE REGARDING SHARED PERSONNEL THAT ARE NOT SUBJECT TO THE INDEPENDENT FUNCTIONING RULE.

1. Generally. Shared Personnel, including supervisors, managers and corporate executives (collectively, “**Supervisory Personnel**”), that are not actively and personally involved on a day-to-day basis in Transmission or Marketing Functions are not subject to the structural separation and independent operation requirements set forth in Section IV.A of these Standards of Conduct Written Procedures. Such personnel may interact and engage in communications with Transmission Function Employees on an unrestricted basis, so long as they comply with the requirements of the No Conduit Rule set forth in Section V of these Standards of Conduct Written Procedures.
- a. The following positions are not actively and personally engaged in day-to-day Transmission Functions or Marketing Functions, so long as Shared Personnel assigned to these positions function in their stated capacity: (1) legal; (2) accounting, (3) tax, (4) finance, (5) treasury, (6) rates and regulatory, (7) legislative affairs; (8) environmental affairs; (9) safety, (10) security, (11) compliance; (12) risk, (13) project management, (14) billing; (15) travel; (16) human resources; (17) corporate communications/public affairs; (18) clerical workers/secretaries; and

- (19) information technology.
- b. Shared Personnel engaged in field, maintenance and construction activities, and long-range and strategic planning activities (including long-range transmission planning) are not Transmission Function Employees, so long as they function in their stated capacity.
 - c. The omission of any positions from the listing in Section IV.B.1.a, above, does not necessarily exclude those positions from falling within the parameters of Section IV.B.1.a or constitute a final determination regarding whether or not those positions fall within the definitions of Transmission Function Employees or Marketing Function Employees.
2. Guidance Applicable to Supervisory Personnel. The exercise of normal course corporate governance and oversight obligations, as well as the participation in long-range and strategic planning activities and the development of general policies and parameters for negotiating wholesale contracts, will not convert Supervisory Personnel into Transmission Function Employees or Marketing Function Employees (as applicable). Any Supervisory Personnel responsible for regularly carrying out or supervising the details of Transmission or Marketing Function activities shall be treated as Transmission or Marketing Function Employees (as applicable) and are subject to the independent operation requirements set forth in Section IV.A of these Standards of Conduct Written Procedures.
 3. Guidance Regarding Participation in Marketing Functions. Supervisory Personnel who are not involved in the negotiation of an electric energy or gas sale, and who do not oversee or provide input into the details of negotiations being carried out by other employees (*e.g.*, by editing and revising material elements of a contract), but rather approve or reject contracts negotiated by such employees are not Marketing Function Employees.
 - a. On rare occasions, Supervisory Personnel may have tangential involvement in wholesale contract negotiations, such as being called in to meet with a counterparty. Such participation in these negotiations will not convert Supervisory Personnel into Marketing Function Employees.
 - b. Supervisory Personnel may review contracts over a specified dollar amount consistent with their assigned corporate governance obligations and the Companies' risk management policies. Such action will not convert Supervisory Personnel into Marketing Function Employees.
 4. Guidance Regarding Participation in Transmission Functions. Supervisory Personnel that regularly carry out or supervise the details of the following activities must be treated as Transmission Function Employees and are subject to the independent operation requirements set forth in Section IV.A of these Standards of Conduct Written Procedures.:
 - a. Granting and denying requests for transmission service;
 - b. Isolating portions of the system to prevent cascades; and
 - c. Imposing transmission loading relief procedures.

Supervisory Personnel responsible for providing general corporate oversight and establishing policy direction regarding Transmission Functions, but do not plan, direct, organize or execute such Transmission Functions are not Transmission Function Employees.

C. EMPLOYEE TRANSFERS SUBJECT TO THE STANDARDS OF CONDUCT.

1. General Rule. Employees may be transferred between a designated Transmission Function Employee position and a designated Marketing Function Employee position, so long as: (1) such transfers are not used as a means to circumvent the *Standards of Conduct* or these Standards of Conduct Written Procedures; and (2) notice of such transfers shall be posted on the LG&E and KU Energy LLC Website or OASIS (as applicable).
 - Employees that are transferred out of a designated Transmission Function Employee position are subject to the No Conduit Rule and are prohibited from sharing any non-public Transmission Function Information, which they were previously privy to, with Marketing Function Employees.
2. Notification of Employee Transfer. The LG&E/KU Human Resources Department shall provide advance notice to the SOC Chief Compliance Officer of all employee transfers into or out of a Transmission Function Employee position or a Marketing Function Employee position. In the event a current LG&E/KU employee will be transferring into a Marketing Function Employee position, Human Resources and the hiring manager should make every effort to notify the SOC Chief Compliance Officer as soon as possible, so that appropriate steps can be taken to ensure compliance with the Standards of Conduct rules.
3. Notice of Employee Transfer Posted. The SOC Chief Compliance Officer shall post notice of the transfer of any employee between a designated Transmission Function Employee position and a designated Marketing Function Employee position on the LG&E and KU Energy LLC Website or OASIS (as applicable) (“**Transfer Notice**”) within seven (7) business days of the effective date of such transfer. All Transfer Notices shall contain the following information and shall remain posted on the LG&E and KU Energy LLC Website or OASIS (as applicable) for a minimum period of ninety (90) days:
 - Name of the transferring employee;
 - The respective titles held by the employee while performing each function (*i.e.*, as a Transmission Function Employee or Marketing Function Employee (as applicable)); and
 - The effective date of the transfer.
4. Cycling of Employees Expressly Prohibited. The Companies recognize that transferring employees multiple times (*i.e.*, cycling) between a designated Transmission Function Employee position and Marketing Function Employee position is not consistent with the independent functioning rule under the *Standards of Conduct*. In order to ensure that employee transfers do not compromise the independent functioning of the Transmission Function Employees and Marketing Function Employees, the SOC Chief Compliance Officer shall monitor the employee transfers and, if necessary, prohibit a proposed transfer in order to avoid potential cycling of employees between Transmission and Marketing Functions.
5. Temporary Transfer Assignments Prohibited. Temporary transfer assignments of employees between designated Transmission Function Employee and Marketing Function Employee positions are prohibited.

D. POSTING REQUIREMENTS.

Unless stated otherwise in these Standards of Conduct Written Procedures, the rules and

procedures setting forth the Companies obligations to post information in compliance with the *Standards of Conduct* independent functioning requirement are set forth in Section VIII below.

E. MEETINGS JOINTLY ATTENDED BY TRANSMISSION FUNCTION EMPLOYEES AND MARKETING FUNCTION EMPLOYEES.

1. Generally. As set forth herein, the Companies recognize that particular care needs to be taken in cross-functional business meetings jointly attended by Transmission Function Employees and Marketing Function Employees (“**Cross-Functional Meetings**”) to protect against the potential risk of sharing of non-public Transmission Function Information and to prevent impairment of the independent functioning rule of the *Standards of Conduct*. For purposes of these Standards of Conduct Written Procedures, Cross-Functional Meetings shall include in-person meetings, conference calls or video conferences in which Transmission Function Employees and Marketing Function Employees participate. In order to: (1) ensure that improper disclosures do not take place during Cross Functional Meetings; and (2) maintain independent operations between Transmission Function Employees and Marketing Function Employees, the procedures and protocols in this Section IV.E shall be followed.
2. General Scope and Application. The requirements of this Section IV.E shall apply to all Cross-Functional Meetings that address legitimate business matters and are not excluded by Section IV.E.4. These meetings include, but are not limited to, operational meetings and federal or state energy regulatory policy discussions. Although not prohibited, Cross-Functional Meetings should be kept to a minimum. All employees participating in Cross Functional Meetings shall ensure adherence with the independent functioning rules of the Standards of Conduct; specifically, marketing function employees shall not engage in transmission function activities, nor shall transmission function employees engage in marketing function activities.
3. Guidance for Cross-Functional Meetings. To ensure that Cross-Functional meetings are conducted consistent with the *Standards of Conduct*:
 - a. All employees attending Cross-Functional Meetings have a responsibility to avoid violations of the *Standards of Conduct* and shall ensure that no non-public transmission function information is disclosed to any Marketing Function Employees.
 - b. Contemporaneous documentation shall be maintained for all Cross-Functional Meetings that meet the requirements of Section V.C.3 (*Disclosure of Non-Public Transmission Function Information Relating to (1) Compliance with Approved Reliability Standards, or (2) Maintaining or Restoring the Operation of the Transmission System or Generation Units, or that May Affect the Dispatch of Generating Units*) or Section V.C.4 (*Disclosures of Non-Public Transmission Function Information during Generation Redispatch Events*).
 - c. For all other types of Cross-Functional Meetings, the meeting organizer, or his or her delegate, should create a contemporaneous auditable/retrievable record (i.e. handwritten, typed or otherwise electronically retained) that includes the date of the meeting, a list of meeting attendees, a brief description of the topics discussed during the meeting, and a confirmation that no non-public transmission information was disclosed. The meeting organizer should retain this record for a period of five (5) years. In cases where the Cross-Functional Meeting took place via a recorded telephone line, the recording is sufficient documentation and the aforementioned information would *not* need to be otherwise recorded and retained.

- d. Pursuant to Section V.B.3 and Section VIII.A.5, below, attendees shall without delay report to the SOC Chief Compliance Officer any disclosures of non-public Transmission Function Information occurring during the Cross-Functional Meeting, in order to allow for timely posting by the SOC Chief Compliance Officer.
4. Exempted Meetings. Meetings or other communications of a general corporate nature jointly attended by Transmission Function Employees and Marketing Function Employees are not subject to the requirements of this Section IV.E. Such exempted meetings include, but are not limited to, matters involving general corporate management, policy or news regarding the Companies and their affiliates, employee benefit matters (i.e., retirement programs, medical plans, mentoring programs, training programs, child daycare meetings, employee outreach assistance, etc.), safety and security matters; training, education and professional development matters; participation in charitable organizations or matters, and recreational outings sponsored by the Companies or their affiliates. Transmission Function Employees and Marketing Function Employees attending such meetings shall nevertheless fully comply with the *Standards of Conduct* and refrain from engaging in any discussions or other communications regarding non-public Transmission Function Information.
 - o Should a disclosure of non-public Transmission Function Information occur, the employees shall without delay report the disclosure to the SOC Chief Compliance Officer for posting on the LG&E and KU Energy LLC Website or OASIS (as applicable) in accordance with Section V.B.3 and Section VIII.A.5, below.

V. PROTOCOLS AND PROCEDURES FOR IMPLEMENTING NO CONDUIT AND TRANSPARENCY RULES.

In compliance with the *Standards of Conduct* regulations, the Companies shall enforce on an ongoing basis the following rules and procedures which are designed to ensure that Marketing Function Employees are not provided with preferential treatment over non-affiliated customers via the exchange of non-public Transmission Function Information. The No Conduit Rule is as critical to the regulatory scheme of the *Standards of Conduct* as the Independent Functioning Rule.

The Companies are prohibited from using anyone (*i.e.*, employee, supervisor, manager or corporate executive) as a conduit for the disclosure of non-public Transmission Function Information to their Marketing Function Employees. Further, an employee, contractor, consultant or agent of the Companies, and an employee, contractor, consultant or agent of the Companies' affiliates engaged in Marketing Functions, is prohibited from disclosing non-public Transmission Function Information in their possession to Marketing Function Employees.

The following protocols and procedures have been developed by the Companies for purposes of facilitating compliance with the No Conduit and Transparency Rules of the *Standards of Conduct*.

A. RESTRICTED ACCESS TO NON-PUBLIC TRANSMISSION FUNCTION INFORMATION ON SHARED COMPUTER SYSTEMS, SOFTWARE AND DATABASES.

1. General Rule. The Companies shall ensure that:
 - a. Marketing Function Employees may only have access to Transmission Function Information on shared computer systems, databases and software applications that is otherwise available to all Transmission Customers without restriction (*e.g.*, information posted on the LG&E and KU Energy LLC Website or the OASIS, as applicable).

- b. Marketing Function Employees may not have access to non-public Transmission Function Information on shared computer systems, databases and software applications that is not otherwise available to the general public without restriction (*e.g.*, information not posted on the LG&E and KU Energy LLC Website or the OASIS, as applicable).

2. Implementation Measures.

- a. Marketing Function Employees may have access to a common EMS, which is utilized to operate the Transmission System and dispatch generation, and to a common LAN; however, such personnel shall be restricted via password protection from viewing non-public Transmission Function Information on this shared system.
 - Marketing Function Employees shall be barred through the use of password protection from accessing the following non-public Transmission Function Information: (1) interchange schedules of individual customers; (2) interchange schedules grouped by company/interface; (3) tie flows by company/interface; (4) individual actual tie flows; (5) all transmission/distribution status data; (6) all transmission/distribution analog data (with the exception of loading levels on interruptible loads); (7) network analysis load flow cases and associated parameters and data; (8) transmission/distribution alarm/event data; (9) system voltages; (10) historical transmission/distribution analog data; (11) historic hourly tie data (individually or by company); and (12) historic hourly schedule data (individually or by company).
 - Marketing Function Employees engaged in regulated generation dispatch functions (“**Generation Dispatchers**”) may have access to the following generation-related information on shared computer systems: (1) total system load; (2) unit status and load information for the generators controlled by subsidiaries of LG&E and KU Energy LLC; (3) system frequency; (4) area control error; (5) aggregate net scheduled interchange; (6) scheduled unilateral inadvertent flows; (7) aggregate actual interchange (net actual tie flows); (8) fuel prices; (9) spinning and supplemental reserves; (10) unit production costs; (11) unit tuning parameters (formula for response to automatic generation control); (12) aggregate load forecasts (for own systems and wholesale requirements customers); (13) loading levels on interruptible loads; (14) voltage levels at plant substations for system control purposes; and (15) historical data for (a) net interchange schedule, (b) net actual interchange, (c) scheduled unilateral inadvertent flows, and (d) total system load.
- b. Transmission Function Employees and Shared Personnel shall ensure that non-public Transmission Function Information is not posted to Company SharePoint sites, Shared Network Drives or the LG&E/KU Intranet, unless access to such locations is restricted via password protection *and* Marketing Function Employees do not have access to the location where the information is posted.

B. RESTRICTIONS ON THE DISCLOSURE OF NON-PUBLIC TRANSMISSION FUNCTION INFORMATION AND PERMITTED EXCLUSIONS.

1. General Rule. Absent Emergency Conditions affecting system reliability and exemption provisions listed in Section V.C, below, Shared Personnel and Transmission Function Employees are prohibited from:

- a. Disclosing to Marketing Function Employees any non-public Transmission Function Information through: (1) non-public communications conducted off the LG&E and KU Energy LLC Website or OASIS (as applicable); (2) access to information not posted on the LG&E and KU Energy LLC Website or OASIS (as applicable) that is not contemporaneously available to the public; or (3) information on the LG&E and KU Energy LLC Website or OASIS (as applicable) that is not at the same time publicly available.
 - b. Sharing with Marketing Function Employees any information acquired from Transmission Customers or potential Transmission Customers, or developed in the course of responding to requests for transmission service or ancillary services, except to the limited extent such information is contemporaneously made available via posting on the LG&E and KU Energy LLC Website or OASIS (as applicable).
2. Implementation Measures. Absent Emergency Conditions affecting system reliability or unless specifically exempted herein, Shared Personnel or Transmission Function Employees must not engage in communications, whether in person, via telephone, by Internet/Intranet e-mail, or facsimile, with Marketing Function Employees regarding non-public Transmission Function Information, if access to such covered information is not: (1) at the same time publicly available to the general public without restriction on the LG&E and KU Energy LLC Website or OASIS (as applicable); or (2) at the same time publicly available to all users of the LG&E and KU Energy LLC Website or OASIS (as applicable).
 3. Prompt Reporting of Improperly Disclosed Information. The SOC Chief Compliance Officer must be contacted without delay if any non-public Transmission Function Information that is not: (1) contemporaneously available to the general public without restriction on the LG&E and KU Energy LLC Website or the OASIS (as applicable); or (2) contemporaneously available to all users of the LG&E and KU Energy LLC Website or the OASIS (as applicable), is or has been disclosed in a manner contrary to the requirements of the *Standards of Conduct* or these Standards of Conduct Written Procedures. There will be no retribution for any reports of actual or alleged disclosures of such information that are made in good faith.

C. EXCLUSIONS TO RESTRICTIONS ON THE DISCLOSURE OF NON-PUBLIC TRANSMISSION FUNCTION INFORMATION.

1. Customer Voluntarily and Expressly Consents to the Disclosure of Information. Shared Personnel and Transmission Function Employees may share covered information regarding a Transmission Customer with Marketing Function Employees, provided that the Transmission Customer voluntarily consents, in writing, to the disclosure of such information. In each such instance, the following procedures shall be followed:
 - a. A copy of the Transmission Customers' written consent shall be forwarded to the SOC Chief Compliance Officer for recordkeeping;
 - b. The Companies shall post a notice of the consent on the LG&E and KU Energy LLC Website or OASIS (as applicable) along with a statement that the Companies did not provide any preferences, either operational or rate-related, to the non-affiliated customer in exchange for its express, voluntary consent to disclose information; and

- c. The SOC Chief Compliance Officer shall maintain the written consent for five (5) years. The Companies shall make such written consent available for inspection by the Commission consistent with the Commission's regulations.
2. Transaction Specific Requests for Transmission Service by Marketing Function Employees. The Companies are not required to contemporaneously disclose to existing Transmission Customers and potential Transmission Customers non-public Transmission Function Information if it relates solely to a Marketing Function Employee's specific request for transmission service. To the extent that a specific request for transmission service by a Marketing Function Employee involves the development and construction of generator interconnection facilities, the Companies shall fully comply with Commission requirements.
3. Disclosure of Non-Public Transmission Function Information Relating to (1) Compliance with Approved Reliability Standards, or (2) Maintaining or Restoring the Operation of the Transmission System or Generation Units, or that May Affect the Dispatch of Generating Units. The Companies are not required to contemporaneously disclose exchanges of non-public Transmission Function Information between Transmission Function Employees and Marketing Function Employees if such information: (1) pertains to compliance with Reliability Standards approved by the Commission, or (2) is necessary to maintain or restore operation of the transmission system or generating units, or that may affect the dispatch of generating units.
 - a. Except during Emergency Conditions, such exchanges of non-public Transmission Function Information must be contemporaneously recorded via hand-written or typed notes, electronic records, such as e-mails, or recorded voice exchanges and retained for a five (5) year period. During Emergency Conditions, such recording shall be completed as described in Section VII.B.1 below.
 - b. Such exchanges of non-public Transmission Function Information pursuant to this Section V.C.3 shall be limited in scope to the information relevant to the Reliability Standard(s) at issue, or to the information relevant to maintaining and restoring the operation of the Transmission System or generating units or affecting the dispatch of the generating units.
4. Disclosures of Non-Public Transmission Function Information during Generation Redispatch Events. The Companies are not required to contemporaneously disclose exchanges of non-public Transmission Function Information between Transmission Function Employees and Generation Dispatchers. In such situations, Generation Dispatchers and Transmission Function Employees shall follow the following procedures and protocols:
 - a. Generation Redispatch Orders Provided by Transmission Function Employees. Except in Emergency Conditions discussed in Section VII.B below, if good utility practice would require a Transmission Function Employee to provide instructions, or information, regarding the dispatch of the Companies' regulated generation resources directly to Generation Dispatchers, such instructions shall be limited to information which may affect the dispatch of the Companies regulated generating units and, as appropriate under the circumstances, may include information necessary to maintain or restore operation of the Transmission System or generating units.
 - Any such communications involving non-public Transmission Function Information must be contemporaneously recorded and retained for a period of five years. The record may consist of hand-written or typed notes, electronic records, such as e-mails, or recorded voice exchanges.

- In the event a Transmission Function Employee discloses non-public Transmission Function Information to a Generation Dispatcher, the Generation Dispatcher (1) shall not use such information to engage in any wholesale power trades; and (2) shall not further disclose such information to other Marketing Function Employees.
- b. Disclosure by Third Party Transmission Provider. If a Third Party Transmission Provider, including, but not limited to, a regional transmission organization or unaffiliated reliability coordinator, discloses non-public Transmission Function Information during the course of a generation dispatch discussion with Generation Dispatchers, the Generation Dispatchers and, if applicable, Transmission Function Employees **SHALL NOT COMMENT** except as necessary to execute the generation dispatch order.
 - c. Subsequent Actions; Third Party Transmission Provider Disclosure; Generation Dispatcher Obligations. In the event a Third Party Transmission Provider discloses non-public Transmission Function Information to a Generation Dispatcher, the Generation Dispatcher (1) shall not use such information to engage in any wholesale power trades; (2) shall not further disclose such information to other Marketing Function Employees; and, (3) should notify the Compliance Department of the disclosure as soon as practicable.

VI. ADMINISTRATION OF TARIFFS RELATING TO THE SALE OR PURCHASE OF OPEN ACCESS TRANSMISSION SERVICE.

As set forth in Section I above, the Companies function as a “provider” of jurisdictional open access transmission service and have a formal OATT on file with the Commission. TransServ, in its role as the ITO, functions as the independent administrator of the OATT. The Companies shall continue to provide services to all customers under the OATT on a comparable and non-discriminatory basis.

A. STRICT ENFORCEMENT OF TARIFF PROVISIONS THAT DO NOT PERMIT THE USE OF DISCRETION.

Transmission Function Employees with tariff administration responsibilities shall strictly enforce all tariff provisions relating to the sale or purchase of open access transmission service to the extent such OATT provisions do not permit the use of discretion.

B. FAIR AND IMPARTIAL ENFORCEMENT OF TARIFF PROVISIONS THAT PROVIDE FOR THE USE OF DISCRETION.

Transmission Function Employees with tariff administration responsibilities shall enforce and apply all tariff provisions relating to the sale or purchase of open access transmission service in a fair and impartial manner that treats all Transmission Customers in a not unduly discriminatory manner. All permissible tariff waivers under the OATT shall be documented as outlined in Section VII.A.

C. NO UNDUE PREFERENCE FOR TRANSMISSION CUSTOMERS.

The Companies shall not, through their tariffs or otherwise, give undue preference to any Transmission Customer in matters relating to the sale or purchase of transmission service (including, but not limited to, matters involving pricing, curtailments, scheduling, and imbalance management).

D. PROCESSING TRANSMISSION SERVICE REQUESTS

The Companies shall process all similar requests for transmission service, whether from an affiliate or a non-affiliated Transmission Customer, in the same manner and within the same period of time.

VII. DOCUMENTATION OF TARIFF WAIVERS AND EMERGENCY CONDITIONS.

A. DOCUMENTATION OF TARIFF WAIVERS.

1. General Definition of a Tariff Waiver. A waiver of the Companies' OATT is "a determination to do or not do something that is specifically required to be done or not done" by the Companies' OATT.
2. Log Detailing Tariff Waivers Granted in Favor of Affiliates. Transmission Function Employees with tariff administration responsibilities shall maintain a written log ("**Tariff Waiver Log**") detailing each waiver of a tariff provision granted by the Companies in favor of an affiliate (unless such waiver has been approved by the Commission). The Companies shall maintain all documentation supporting each waiver in the Tariff Waiver Log for up to five (5) years.
3. Reporting of Tariff Waivers. The involved Transmission Function Employees shall report such waiver, in writing, to the SOC Chief Compliance Officer without delay after such waiver is granted. Such reports shall be made with enough lead time to allow the posting described in Section VIII.A.4 below.
4. Posting of Tariff Waivers. Following notice to the SOC Chief Compliance Officer pursuant to Section VII.A.3, the SOC Chief Compliance Office shall, in coordination with the Director, Transmission Strategy and Planning and the Corporate Communications Dept., as necessary, ensure that a notice of each waiver of a tariff provision granted in favor of the Companies' affiliates is posted on the LG&E and KU Energy LLC Website or OASIS (as applicable) within one (1) business day of the granting of each such waiver, unless such waiver has been approved by the Commission.

B. DOCUMENTATION OF EMERGENCY CONDITIONS.

Disclosure of Non-Public Transmission Function Information during Emergency Conditions. If during Emergency Conditions Transmission Function Employees and Marketing Function Employees exchange non-public Transmission Function Information (a) to comply with Reliability Standards approved by the Commission, or (b) to maintain or restore operations of the Companies' Transmission System or generating units or that may affect the dispatch of generating units, the immediate recordation and posting requirements of Sections V.C.3, V.C.4 and VIII.A.5. shall not apply. Instead, the record and posting of the exchange must be made as soon as practicable after the fact.

VIII. PROTOCOLS AND PROCEDURES GOVERNING POSTING REQUIREMENTS.

A. INFORMATION REQUIRED TO BE POSTED IN COMPLIANCE WITH THE TRANSPARENCY RULE.

1. Identification of Employee, Affiliate and Facility Information. The SOC Chief Compliance Officer shall, in coordination with the Corporate Communications Dept., the IT Dept., the HR Dept., Director, Transmission Strategy and Planning, Director, Transmission Operations and any other applicable business unit, ensure that the information described below is maintained

on the LG&E and KU Energy LLC Website in compliance with the *Standards of Conduct*. In addition, the SOC Chief Compliance Officer, the Corporate Communications Depts., the HR Dept., and the IT Dept. shall work together to ensure that updates are posted on the LG&E and KU Energy LLC Website within seven (7) business days of the effective date of any change or revision thereto (and shall post the date on which the information was updated).

- a. Identification of Transmission Function Employees. The LG&E/KU Human Resources Department shall provide notice to the SOC Chief Compliance Officer of all employee hires or transfers into a Transmission Function Employee position. The SOC Chief Compliance Officer shall, in coordination with the Companies' Corporate Communications Department, post a complete and updated list of the job titles and job descriptions of Transmission Function Employees.
 - b. Identification of Marketing Function Affiliates. A complete and updated list of the names of all affiliates that employ or retain Marketing Function Employees.
 - c. Employee Transfer Information. As set forth in Sections IV.C.2 and IV.C.3, above, the SOC Chief Compliance Officer shall, in coordination with the Companies' Corporate Communications and HR Depts., post Transfer Notices on the LG&E and KU Energy LLC Website or OASIS (as applicable) within seven (7) business days of the effective date of the transfer of an employee to the Companies' Transmission Function from a Marketing Function position, or to a Marketing Function position from a Transmission Function position. All Transfer Notices shall be posted on the LG&E and KU Energy LLC Website or OASIS (as applicable) for a minimum period of ninety (90) days.
 - d. Shared Facilities. A complete and updated list of any work facilities shared by Transmission Function Employees and any Marketing Function Employees. Such postings shall describe the types of facilities shared and the addresses of such facilities.
2. Standards of Conduct Written Procedures. A copy of these Standards of Conduct Written Procedures, as updated, revised or supplemented from time to time, will be posted on the LG&E and KU Energy LLC Website or OASIS (as applicable). Any updates, revisions or supplements to these Standards of Conduct Written Procedures will be posted on the LG&E and KU Energy LLC Website or OASIS (as applicable) within seven (7) business days of the effective date for such updates, revisions or supplements.
 3. Merger Information. The SOC Chief Compliance Officer, in coordination with the Corporate Communications Dept., shall post all relevant information regarding potential merger partners on the LG&E and KU Energy LLC Website or OASIS (as applicable) within seven (7) days of the public announcement of a proposed merger. Consistent with general Commission policy, the Companies shall treat a potential merger partner and its subsidiaries and affiliates as if they are *de facto* affiliates of the Companies during the pendency of a merger transaction. Within seven (7) business days of the consummation of a pending merger transaction, the SOC Chief Compliance Officer, in conjunction with the Corporate Communications and IT Depts., shall formally update the Standards of Conduct Written Procedures and other *Standards of Conduct* compliance information.
 4. Waivers of Tariff Provisions Granted in Favor of Affiliates. All Tariff Waivers granted in favor of an affiliate shall be documented, including related postings, as outlined in Section VII.A above.
 5. Improperly Disclosed Non-Public Transmission Function Information. Should any Shared Personnel or Transmission Function Employee improperly disclose non-public Transmission

Function Information, the SOC Chief Compliance Officer must be contacted without delay pursuant to the procedures and protocols of Section V.B.3, above. The SOC Chief Compliance Officer, in coordination with the Corporate Communications Dept., shall post all relevant information regarding any improper disclosure as required by the *Standards of Conduct*.

B. MONITORING AND AUDIT OF POSTING PROCEDURES.

The SOC Chief Compliance Officer shall, in coordination with the Corporate Communications and IT Depts., monitor and periodically review the informational postings required by the *Standards of Conduct* and these Standards of Conduct Written Procedures for compliance and accuracy.

IX. TRAINING.

A. ANNUAL STANDARDS OF CONDUCT TRAINING

The *Standards of Conduct* regulations require that the Companies provide annual Standards of Conduct training to all Transmission Function Employees, Marketing Function Employees, and Shared Personnel that are likely to become privy to Transmission Function Information.

1. The SOC Chief Compliance Officer shall, on an annual basis, determine the criteria (for example, job titles, departments, and/or business lines) for inclusion in the annual Standards of Conduct training (“**SOC Training Criteria**”).
2. The SOC Chief Compliance Officer and the Human Resources Department shall work together to identify all employees who meet the SOC Training Criteria.
3. All employees assigned the annual Standards of Conduct training are expected and required to complete the training and certification in a timely manner.
4. Each employee assigned the annual Standards of Conduct training must certify electronically or in writing that they have completed the training.

B. NEW AND TRANSFER EMPLOYEE STANDARDS OF CONDUCT TRAINING

The *Standards of Conduct* regulations require that all new employees assigned to a designated Transmission or Marketing Employee position or a position that is likely to become privy to Transmission Function Information, and all employees that transfer into a designated Transmission or Marketing Employee position or a position that is likely to become privy to Transmission Function Information, receive Standards of Conduct training within the first 30 days of their employment or position change.

1. The Human Resources Department shall provide a list, at least once every seven (7) days, to the SOC Chief Compliance Officer of all new or rehired employees, and all employees whose job positions are affected by a change which could affect their Standards of Conduct training requirements (“**Position Change**”).
 - Position Changes include items such as: (1) changes in manager, department, title, or business unit; (2) promotions, demotions or transfers; (3) retirements, terminations or leaves of absence; and/or (4) changes in work status, such as a return from leave of absence or long-term disability.
2. Upon receipt of the list, the SOC Chief Compliance Officer shall utilize the SOC Training Criteria to identify new or transfer employees required to complete the Standards of Conduct training.

3. All employees assigned the Standards of Conduct training are expected and required to complete the training and certification in a timely manner.
4. Each new or transfer employee assigned the Standards of Conduct training must certify electronically or in writing that they have completed the training.