

Standards of Conduct (Transmission) Policy 2 – Prompt Posting	Revision: B Effective Date: 10/09/18	Author: General Counsel (Central Region) <u>Sarah B. Knowlton</u> <small>Sarah B. Knowlton (Oct 5, 2018)</small>
Approval Signature(s) and date: <u>Mary Ellen Paravalos</u> <small>Mary Ellen Paravalos (Oct 23, 2018)</small> Chief Compliance and Risk Officer		

Revision History

Revision	Date	Changes	Approved By
A	08/16/17	Created New Documentation	L. Beirsto
B	10/09/18	Annual Review; added the name of the Incident Reporting System, Integrity Counts; Changed Chief Compliance Officer to Chief Compliance and Risk Officer and approver from J. Tindale to M. Paravalos	M. Paravalos

PRINCIPLE:

This policy addresses how the APUC Transmission Providers will ensure prompt posting of improperly disclosed transmission information pursuant to Standards of Conduct regulatory requirements. Employees of APUC Transmission Providers engaged in the Marketing Function are prohibited from having preferential access to any information about the transmission system that is not equally available to all OASIS users. [§ 358.5]

PRACTICE:

- I. Information regarding the status (outages) on any APUC Transmission Provider’s transmission system will be posted on the appropriate OASIS. Information regarding system outages from Algonquin Tinker Gen Co. will be posted on the New Brunswick Power OASIS as appropriate. Information regarding system outages from The Empire District Electric Company will be posted on the SPP OASIS as appropriate.
- II. All employees, contractors, consultants or agents of any APUC Transmission Provider are prohibited from transmitting or communicating any information to those employees engaged in the Marketing Function except through public communication made available to all OASIS users at the same time. [§ 358.6]
- III. Limited information regarding the transmission system may be released to any transmission customer in response to a request for service as specified in the

Company's Open Access Tariff or other applicable Open Access Tariff. Such information may be provided to Marketing Function employees concerning conditions affecting their transactions pursuant to Standards of Conduct voluntary procedures. Such information may also be provided to Marketing Function employees acting as agent for transmission customers concerning conditions affecting the transactions of such customers pursuant to the appropriate Standards of Conduct policy. Exceptions to the above rules prohibiting disclosure of information to the Marketing Function may be granted when it is necessary to share crucial operating information with the Marketing Function in order to maintain reliability of transmission system (emergencies). Such instances will be posted on the appropriate OASIS within one business day.

- IV. If information about the transmission system that is not posted on the appropriate OASIS is disclosed to any person or persons engaged in the Marketing Function in a manner contrary to the requirements of these Standards, the incident must be reported to his/her supervisor or the Chief Compliance and Risk Officer or through use of the Incident Reporting System, "Integrity Counts". If non-public information about the transmission system is disclosed the following Incident Reporting System should be used:

On line at www.whistleblowersecurity.com

By email at algonquinpower@whistleblowersecurity.com

Toll-free telephone at 1-866-921-6714

- V. Both will be posted on the appropriate APUC Transmission Provider OASIS immediately (but no longer than 24 hours from the time of the report). Details regarding the type of information supplied, to whom it was supplied, when it was supplied and the circumstances surrounding the disclosure must be provided. Employees that fail to supply information regarding such disclosures will be subject to disciplinary action under the terms of any disciplinary policy, up to and including unpaid disciplinary suspension or termination of employment.
- VI. Employees shall consider any information acquired from non-affiliated Transmission Customers or potential non-affiliated Transmission Customers or developed in the course of responding to requests for transmission service or ancillary service as confidential and will not convey such information to any employee, contractor, consultant or agent engaged in the Marketing Function, except to the limited extent information is required to be posted on the appropriate APUC Transmission Provider OASIS in response to a request for transmission service or ancillary services.
- VII. A non-affiliated transmission customer may voluntarily consent, in writing, to allow an APUC Transmission Provider to share the non-affiliated customer's information with the Marketing Function employees. Notice of such voluntary consent must be posted on the appropriate APUC Transmission Provider's OASIS.

VIII. Transfers of personnel between Transmission Function and the Marketing Function areas are permitted; with such transfer notification to be posted on the appropriate APUC Transmission Provider's OASIS for a period of 90 days.

IX. The APUC Transmission Providers will utilize the following OASIS systems for postings:

For The Empire District Electric Company: The Southwest Power Pool's (SPP) OASIS.

For Algonquin Tinker Gen Co: New Brunswick Power Corporation's OASIS. Public information regarding the APUC Transmission Provider's transmission systems and open-access transmission tariffs will be posted, or made accessible through these locations.
