

Standards of Conduct (Transmission) Policy 3 – Separation	Revision: B Effective Date: 10/09/18	Author: General Counsel (Central Region) <i>Sarah B. Knowlton</i> <small>Sarah B. Knowlton (Oct 5, 2018)</small>
Approval Signature(s) and date: Chief Compliance and Risk Officer <i>Mary Ellen Paravalos</i> <small>Mary Ellen Paravalos (Oct 23, 2018)</small>		

Revision History

Revision	Date	Changes	Approved By
A	08/16/17	Created New Documentation	L. Beairsto
B	10/09/18	Annual Review; 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 APUC Transmission Providers will ensure the operation of their transmission systems independently of its own Marketing Functions.

PRACTICE:

- I. Marketing Function employees are physically separated from Transmission Function employees.
- II. The APUC Transmission Providers do not allow uncontrolled access to any transmission system control center and other related transmission facilities by employees that do not work in Transmission Function roles or directly engaged in the construction, operation or maintenance of the transmission system. Access to any transmission system control center is restricted by use of a lock system.
- III. Other transmission areas, including substations, have controlled access by use of a lock system. Employees and visitors not working in the transmission system control center or directly engaged in the construction, operation or maintenance of the transmission system are allowed access to these areas on an approved basis, as long as such access is consistent with the Standards of Conduct.
- IV. Those employees engaged in a Marketing Function may have access to the

transmission system control center or other transmission areas in the same manner as any other open access Transmission Customer.

- V. To reduce the possibility of an accidental Standards of Conduct incident involving Marketing Function employees, APUC Transmission Providers prohibit verbal and or written communications related to transmission system status information in and around energy trading areas.
 - VI. Limitations on access to Transmission Function areas can be waived in cases of properly declared system emergencies; however, all cases in which these rules are waived must be documented and posted (or requested to be posted in the case of Algonquin Tinker Gen Co.) on the applicable OASIS site for the APUC Transmission Provider within one business day of the act of the waiver.
 - VII. Transmission system database information regarding transmission operations will be restricted to those employees engaged in Transmission Function operations and those employees whose jobs are directly related to constructing or maintaining the transmission system, and management, as appropriate. Transmission information displayed on a transmission system database console is restricted through the use of console login names and passwords. Certain Company personnel are also allowed, after appropriate approvals and password authentications, for access to “view only” transmission system database information, generation and transmission information through the installation of a software application, except Marketing Function personnel which are limited to non-transmission status and operations information. Transmission and Conduit personnel are strictly prohibited from providing access to their full view of the transmission system database information to Marketing Function personnel and/or sharing or copying of their transmission system database “view only” software application with other personnel or third parties. Violations of this policy will result in disciplinary actions under the discipline policy, up to and including unpaid disciplinary suspension or termination of employment.
 - VIII. The Empire District Electric Company Marketing Function and Transmission Operations jointly use an energy accounting system, a corporate computer network, a corporate telecommunications network, and the Southwest Power Pool (“SPP”) SPPNET system (which is administered by SPP). In the case of Algonquin Tinker Gen Co., corporate computer networks and telecommunications networks are shared. In all cases, each APUC Transmission Provider’s information contained in or transmitted through these systems is protected by logins and passwords. Security on APUC information technology systems is administered by the Information Technology Department.
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