

Manitoba Hydro

STANDARDS OF CONDUCT
FOR PROVIDING OPEN
ACCESS TRANSMISSION
AND INTERCONNECTION
SERVICE

IMPLEMENTATION PROCEDURES

ADMINISTRATIVE UPDATES		
Date	Update	Made By
2016 03 10	<ul style="list-style-type: none"> > Removed the Major Capital Projects Business Unit. > Changed Post Acts of Waiver to Not Give Undue Preference under Implementation of the Non-Discrimination Rule and removed information regarding the posting of Waivers. > Added a section entitled Requests for Transmission Function Information. 	D. Paryniuk
2017 01 06	<ul style="list-style-type: none"> > Removed hyperlinks to information on the Compliance SharePoint Site to allow for the same version of the Implementation Procedures to be used on the Compliance SharePoint Site and the external Manitoba Hydro website. > Aligned the information in these Implementation Procedures with the revised Standards of Conduct page on the external Manitoba Hydro website. 	D. Paryniuk
2017 03 15	<ul style="list-style-type: none"> > Removed the Customer Care & Energy Conservation Business Unit. > Changed the names of the Business Units from Generation Operations to Generation & Wholesale, from Finance & Regulatory to Finance & Strategy, and from Customer Service & Distribution to Marketing & Customer Service. > Changed the name of the page on the NERC CIP Compliance SharePoint Site from Contractor PRA & Training Resources to the Contractor Records & CIP Resources. 	D. Paryniuk
2017 07 28	> Changed Transmission Services Department to Transmission Services & Compliance Department; Compliance SharePoint Site to Ethics & Compliance SharePoint Site; Power Sales & Operations Division to Wholesale Power & Operations Division; Energy Operations Planning Department to Energy Operations & Technology Department; Law Division to Legal Services Division; and, Human Resource Services Department to Labour Relations & Human Resource Services Department.	D. Paryniuk
2017 11 22	> Changed Transmission Business Unit to Transmission Operating Group; Generation & Wholesale Business Unit to Generation & Wholesale Operating Group; Marketing & Customer Service Business Unit to Marketing & Customer Service Operating Group; Finance & Strategy Business Unit to Finance & Strategy Corporate Group; General Counsel & Corporate Secretary to General Counsel & Corporate Secretary Corporate Group; Human Resources & Corporate Services Business Unit to Human Resources & Corporate Services Corporate Group; and, Energy Operations & Technology Department to Energy Operations Planning & Technology Department.	D. Paryniuk
2021 08 26	Changed Transmission Operating Group to Operating Group; Generation & Wholesale Operating Group to Wholesale & Commercial Contracts Division; Marketing & Customer Service Operating Group to Customer Solutions & Experience. General updates to Procedure document for clarity and consistency.	C. Kreutzer

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1) BACKGROUND

a) **Order No. 888**

In 1996, the United States Federal Energy Regulatory Commission (FERC) issued an order, commonly known as Order 888¹, which required that all investor-owned utilities in the United States allow third parties to use their transmission systems to buy and sell energy pursuant to a form of agreement called an open access transmission tariff. The FERC's objective was to eliminate anti-competitive practices by establishing a non-discriminatory system in which all participants would be required to utilize a standardized agreement.

b) **Order No. 889**

In 1996, the FERC also issued a companion order, known as Order 889², which required that United States public utilities adopt a set of rules, called standards of conduct, separating transmission and merchant functions. These rules were intended to foster competition in electricity and gas markets by restricting the ability of an electric transmission or a gas transportation company to grant undue preferences to its own marketing and sales functions, or to those of its affiliates.

c) **Order No. 717**

In 2008, FERC issued Order 717³ which made substantial amendments to the standards of conduct. The Order clarified and simplified standards of conduct compliance; re-adopted an employee functional approach; eliminated the concept of energy affiliates; more carefully defined transmission function employees and marketing function employees; and, clarified the roles of senior officers, directors, supervisory and shared employees. The Order prohibits the passing of non-public transmission information from a power company's transmission business unit to those who sell or support the sale of wholesale energy in the same company.

d) **Response to Orders**

Manitoba Hydro determined that it would adopt the form of agreement called an open access transmission tariff and comparable standards of conduct in order to provide reciprocal transmission service and to foster market access for its surplus energy in the United States.

As a result, in 1999, Manitoba Hydro functionally separated the transmission functions and the marketing functions of the corporation, each reporting to its own Vice-President; established its own open access transmission and interconnection tariffs in a form substantially the same as the FERC approved tariff; and adopted its own standards of conduct.

¹ Order No. 888 is entitled *Promoting Wholesale Competition through Open Access Non-discriminatory Transmission Services by Public Utilities*

² Order No. 889 is entitled *Open Access Same-time Information System and Standards of Conduct*

³ Order No. 717 is entitled *Standards of Conduct for Transmission Providers*

Today, Transmission Function Employees reside in the Operations Business Unit and the Asset Planning & Delivery Business Unit, while Marketing Function Employees reside in the Customer Service & Experience Unit.

In 2010 and 2014, Manitoba Hydro issued revisions of its *Standards of Conduct for Providing Open Access Transmission and Interconnection Service (Standards of Conduct)* to coordinate with Order 717.

The general principles of the *Standards of Conduct* require that Manitoba Hydro's employees engaged in transmission system operations, function independently from employee's engaged in marketing and sales, and that Manitoba Hydro treat all transmission customers on a non-discriminatory basis.

The *Standards of Conduct* also require that Manitoba Hydro post on its Internet Website, current written procedures for implementing the *Standards of Conduct* in such detail as will enable customers to determine that Manitoba Hydro is in compliance with the requirements of the *Standards of Conduct*.

These *Standards of Conduct for Providing Open Access Transmission and Interconnection Service Implementation Procedures (Implementation Procedures)* are intended to identify the key processes and procedures necessary to maximize the likelihood of compliance with the *Standards of Conduct*, as well as, to allow Manitoba Hydro to manage compliance risk.

While Manitoba Hydro voluntarily maintains its Standards of Conduct to participate in FERC jurisdictional markets, the Province of Manitoba's participation in the Canadian Free Trade Agreement and the New West Partnership Trade Agreement requires Manitoba Hydro to maintain and enforce standards of conduct.

2) STANDARDS OF CONDUCT

a) Purpose

Manitoba Hydro is an integrated company and the purpose of the Manitoba Hydro Standards of Conduct is to govern interactions between Transmission Function Employees and the Marketing Function Employees at Manitoba Hydro. All Transmission Customers, affiliated or not, can receive Transmission Service in a non-discriminatory manner.

b) Responsibility

All Manitoba Hydro employees are individually responsible for understanding and complying with the Standards of Conduct. All employees are to follow the established procedures for ensuring compliance with the Standards of Conduct. Employees are to

report any suspected violations of the Standards of Conduct to the Compliance Officer and to cooperate fully in any investigations of potential violations.

Manitoba Hydro will promote a culture of compliance throughout the organization to ensure that the requirements of *Corporate Policy P603: Standards of Conduct for Providing Open Access Transmission and Interconnection Service* are satisfied.

The *Standards of Conduct* may be revised by the Compliance Officer to reflect changes initiated by Manitoba Hydro. Any such revisions require the approval of the Executive Leadership Team of Manitoba Hydro. The Corporate Policy references the revised *Standards of Conduct for Providing Open Access Transmission and Interconnection Service*, herein referred to as the *Standards of Conduct*.

c) General Principles

The *Standards of Conduct* focus on four general principles that govern the interaction and communication between Transmission Function Employees and Marketing Function Employees. The standards also apply to employees with access to and who are likely to become conduits of Transmission Function Information. These general principles are described in Section 1) General Principles of the *Standards of Conduct* and further described in these procedures.

d) Key Definitions

Capitalized terms used in these *Implementation Procedures* shall have the meanings ascribed to them in Section 2) Definitions of the *Standards of Conduct* and as otherwise noted below:

Affected Employees refers to Transmission Function Employees, Marketing Function Employees and Potential Conduit Employees.

3) STANDARDS OF CONDUCT IMPLEMENTATION PROCEDURES

a) Responsibilities of Transmission Function Employees and Potential Conduit Employees

Transmission Function Employees and Potential Conduit Employees must be aware of the information restrictions and the rules regarding the exchange of Transmission Function Information with Marketing Function Employees.

- Transmission Function Employees and Potential Conduit Employees are prohibited from exchanging Transmission Function Information with Marketing Function Employees per the no conduit rule.
- Transmission Function Employees and Potential Conduit Employees are not restricted from exchanging transmission information that can be obtained via a public source, such as the OASIS or the Internet Website, with Marketing Function Employees. Such information is referred to as “public” transmission information.
- If a Transmission Function Employee or a Potential Conduit Employee, either *intentionally* or *unintentionally*, discloses Transmission Function Information to a Marketing Function Employee, the employee must immediately contact the Compliance Officer and state what Transmission Function Information was disclosed.
- If a Transmission Function Employee or Potential Conduit Employee discloses Transmission Function Information to a Marketing Function Employee, the employee may be subject to disciplinary action in accordance with Corporate Policy (P594) Discipline.
- A currently maintained list of Transmission Function Employees can be found on the Standards of Conduct SharePoint site [here](#)
- A currently maintained list of Potential Conduit Employees can be found on the Standards of Conduct SharePoint site [here](#)

b) Responsibilities of Marketing Function Employees

Marketing Function Employees shall not gain, or attempt to gain, access by any means to transmission facilities, including computer systems, or Transmission Function Information.

- If a Marketing Function Employee *unintentionally* gains access to transmission facilities or Transmission Function Information, the Marketing Function Employee must not enter the facilities or review the information and must immediately report the access to the Compliance Officer.

- If a Marketing Function Employee *intentionally* gains access to transmission facilities or Transmission Function Information; ii) enters a transmission facility or reviews Transmission Function Information after *unintentionally* gaining access thereto; or (iii) fails to report gaining access to transmission facilities or Transmission Function Information they may be subject to disciplinary action in accordance with Corporate Policy (P594).i).
- A currently maintained list of Marketing Function employees can be found on the Standards of Conduct SharePoint site [here](#)

c) Responsibilities of the Compliance Officer

The Compliance Officer is responsible for ensuring that Affected Employees are acting in compliance with the *Standards of Conduct*. Such responsibilities include:

- Providing guidance on the Standards of Conduct
- Investigating allegations of breaches of the Standards of Conduct
- Periodically reviewing and working with department managers as required to identify Affected Employees in accordance with *Procedures for Identifying Affected Employees*
- Maintaining up to date lists of Affected Employees on the internal Standards of Conduct page of the Ethics and Compliance SharePoint site
- Ensuring that all Affected Employees receive training as required by the *Standards of Conduct*
- Distributing these *Implementation Procedures* to all Affected Employees
- Monitoring employee transfers between identified Manitoba Hydro departments to ensure that appropriate actions are taken for employees that move from being Transmission Function Employees to being Marketing Function Employees and vice versa
- Ensuring proper documentation of *Standards of Conduct* issues and retaining such documentation for the requisite period of time
- Monitoring and updating informational postings to ensure that data is current, correct and consistent with the *Standards of Conduct* and these *Implementation Procedures as detailed in Procedures for External website postings*
- Attending joint meetings between Transmission Function Employees and Marketing Function Employees, as required.
- Maintain a database to record requests for access to Transmission Function Information

d) Responsibilities Senior Management and Supervisory Personnel

Manitoba Hydro's senior management and supervisory personnel are responsible for maintaining the highest level of integrity in all their actions and fostering a culture of compliance.

Manitoba Hydro may allow senior management such as officers and directors, to have ultimate responsibility for both the transmission function and marketing function, as long as these persons do not actively and personally participate in the day-to-day direction, organization or execution of the transmission function or marketing function. For further clarity, senior management with access to Transmission Function Information should not engage in the Marketing function.

Management and Supervisory personnel are responsible to notify the Compliance Officer in the following circumstances:

- Changes to job titles or duties for Transmission Function Employees
- Any new Transmission Function Employee
- Any new Marketing Function Employee
- Any consultants or agents that have access to Transmission Function Information or provide a Marketing Function
- Any transfer of employees between a Marketing Function and Transmission Function

e) Implementation of the Non-Discrimination Rule

The Non-Discrimination Rule refers to the provisions in the Manitoba Hydro Open Access Transmission Tariff (OATT) and the Manitoba Hydro Open Access Interconnection Tariff (OAIT). These provisions ensure that Manitoba Hydro treats customers and potential customers on a non-discriminatory basis.

f) Implementation of the Independent Functioning Rule

Manitoba Hydro has delegated the responsibility for ensuring that Transmission Function Employees function independently from Marketing Function Employees, except as permitted in the *Standards of Conduct*, to the Transmission Provider and an Affiliate of Manitoba Hydro with Marketing Function Employees (herein referred to as the “Marketing Affiliate”). The rule shall be implemented in accordance with the following:

Manitoba Hydro’s Transmission Function Employees function separately and independently from Manitoba Hydro’s Marketing Function Employees, except during circumstances which severely disrupt the Transmission Provider’s normal business operations.

i) Ensure Separation of Functions

Transmission Function Employees are not permitted to perform Marketing Functions and Marketing Function Employees are not permitted to perform Transmission Functions.

(1) Control Access to Physical Premises

Manitoba Hydro has taken measures to ensure that there is physical separation between Marketing Function Employees and Transmission Function Employees. Where Transmission Function Employee's work in the same physical location, physical barriers have been put in place with key fob access restrictions in place.

Access to the System Control Centre is controlled by a key fob access system and 24 hour security procedures. Only personnel authorized by the Transmission System Operations Division have key fob access to the System Control Centre. Other persons, including Marketing Function Employees, may have limited supervised access to the System Control Centre, excluding Manitoba Hydro's system control room. Such visitors must sign in for access to the System Control Centre with security personnel and must be personally escorted within the System Control Centre by an employee of the System Operations Division. Non-affiliated Transmission customers may be granted access to these facilities, and if such access is granted, the same access guidelines (procedures) shall be used.

Access to the system control room within the System Control Centre is restricted to System Control Centre staff and support staff from other departments within the Operations Group who are responsible for System Control Centre software, hardware, communications and transmission security studies. Access to the system control room is controlled by a key fob access system. Marketing Function Employees are strictly prohibited from accessing the system control room.

(2) Training

Transmission Function Employees are prohibited from providing training related to Transmission Functions to Marketing Function Employees unless the training is available to non-affiliates and is publicized by an Internet Website (or OASIS) posting.

(3) Cycling of employees

Employees will be permitted to transfer between Transmission and Marketing Functions, however they may not make multiple transfers or "cycle" between Transmission and Marketing Functions. Transmission Function Employees who transfer to the Marketing Function may not use (or disclose to other Marketing Function Employees) information obtained while they performed the Transmission Function. Further, to ensure compliance with the Independent Functioning Rule and to maintain transparency for all Transmission Customers, any transfer must be posted on the Internet Website before the transfer occurs and the posting must be maintained on the Internet Website for 90 days.

g) Implementation of the No Conduit Rule

Manitoba Hydro has delegated the responsibility for ensuring that its employees, contractors, consultants and agents do not disclose, or use a conduit to disclose, Transmission Function Information to Marketing Function Employees to the

Transmission Provider and the Compliance Officer. The rule shall be implemented in accordance with the following:

i) Prohibit Sharing of Transmission Function Information

Manitoba Hydro is prohibited from using anyone as a conduit for the disclosure of Transmission Function Information to its Marketing Function Employees. It is a one-way restriction, meaning that it applies only to the transfer of information to Marketing Function Employees; Transmission Function Employees are not prohibited from having access to Marketing Function information.

Any employee, contractor, consultant or agent of Manitoba Hydro, and any employee, contractor, consultant or agent of an Affiliate of Manitoba Hydro that is engaged in the Transmission Function, is prohibited from disclosing Transmission Function Information to any Marketing Function Employee.

ii) Confirm Nature of the Information and Eligibility of Requestor

Prior to sharing Transmission Function Information with any Manitoba Hydro employee, the employee with the Transmission Function Information must determine whether the requestor is allowed to receive such information under the Standards of Conduct. If the employee with the Transmission Function Information is unsure whether the information is in fact Transmission Function Information or whether the requestor is entitled to receive such information, the employee will consult with his or her supervisor or the Compliance Officer.

iii) Permitted Disclosures under the No Conduit Rule

The Standards of Conduct permit the provision of information from Transmission Function Employees to Marketing Function Employees under the following circumstances:

(1) Marketing Function Employee's own Transmission Service Request

A Transmission Function Employee may discuss with a Marketing Function Employee a specific request for Transmission Service submitted by that Marketing Function Employee. The Transmission Function Employee is not required to contemporaneously disclose information otherwise covered by the No Conduit Rule if the information relates solely to a Marketing Function Employee's specific request for Transmission Service. Transmission Function Employees must treat the Marketing Function like any other Transmission Customer. In keeping with this, scoping meetings in conjunction with specific transmission requests are permissible and are not required to be posted or recorded contemporaneously (by notes, e-mail, recorded phone, etc.).

(2) Voluntary Consent

A Transmission Customer may voluntarily consent, in writing, to allow a Transmission Provider to disclose the Transmission Customer's non-public information to the Transmission Provider's Marketing Function Employees. If the Transmission Customer authorizes such a disclosure, the Transmission Provider must post on its website notice of the consent and a statement that it did not provide any preferences, either operational or rate-related, in exchange for the consent.

(3) System Transactions

Information about an outage that affects only Manitoba Hydro's Marketing Function may be shared without posting. However, no information about the status of the transmission system that affects other Transmission Customers in addition to Manitoba Hydro's Marketing Function may be shared except through a public posting.

(4) Emergency Event

In the event of an emergency, such as an earthquake, flood, fire hurricane or cyber incident, that severely disrupts a Transmission Provider's normal business operations, the Standards of Conduct, including the posting requirements, may be suspended. When addressing an emergency, the Transmission Provider is not required to maintain contemporaneous records for joint meetings or communications between Transmission and Marketing Function Employees.

(a) Transmission System Operations

With respect to Transmission system operations, Transmission Function Employees may discuss with Marketing Function Employees Transmission Function Information when the information:

- (1) pertains to compliance with Reliability Standards;
- (2) is necessary to maintain or restore operation of the transmission system or generating units; or
- (3) may affect generator dispatch.

In these three situations, the communication must be:

- (1) recorded contemporaneously (by notes, e-mail, recorded phone, etc.); and
- (2) retained for five years.

iv) Control Access to Transmission Function Information

Employees who access Transmission Function Information should practice using good security measures to ensure the security of Transmission Function

Information. Employees should not inform Marketing Function Employees that Transmission Function Information will be posted or has been posted on the Internet Website. Employees should not share non-public transmission line outage information with Marketing Function Employees.

v) Interactions and Meetings

Manitoba Hydro often engages in conversations and meetings that may include Transmission Function Employees and Marketing Function Employees in the normal course of business. These are permissible provided that Transmission Function Information is not disclosed in a manner contrary to the requirements of these Standards of Conduct. If it is unclear whether a topic is permissible for either a conversation or a meeting, the Transmission Function Employee should seek clarification from the Compliance Officer.

Examples of topics suitable for acceptable joint meetings or conversations include meetings or conversations concerning: (1) long-term integrated resource planning; (2) long-term transmission planning; (3) discussion of public transmission information from open industry meetings such as MISO meetings. These meetings must be recorded in accordance with standard procedures (e.g. telephone records, voice transcripts, email prints, etc.) of the company, as updated and amended from time to time.

vi) Ensure Proper Restrictions to Information Systems

The Transmission Provider and the Affiliate share the Energy Management System (EMS) and Supervisory Control and Data Acquisition (SCADA) System. Both systems contain Transmission Function Information and have restrictions in place to comply with the *Standards of Conduct*.

The EMS and the SCADA System provide for Control Area responsibilities and control over transmission and generation facility operations and data acquisition from substations. Access to real-time data from the EMS and the SCADA System is confined to computer systems within the System Control Centre and a back-up control facility.

Applications that use Transmission Function Information not available on the OASIS or the Internet Website are not accessible to Marketing Function Employees.

h) Implementation of the Transparency Rule

Manitoba Hydro has delegated the responsibility for providing equal access to Transmission Function Information to all its Transmission Customers, affiliated and non-affiliated, except confidential customer information or Critical Energy

Infrastructure information, to the Transmission Provider and the Compliance Officer. The rule shall be implemented in accordance with the following procedures:

The Transparency Rule requires the public posting of certain information and is designed to alert Transmission Customers to potential instances of undue preference due to the improper disclosure of Transmission Function Information in order to ensure equal access to Transmission Function Information.

i) Contemporaneous Disclosure

Under the Transparency Rule, Manitoba Hydro must immediately post Transmission Function Information, that is disclosed to a Marketing Function Employee in a manner contrary to the requirements of these Standards of Conduct. If the information is confidential information of a Transmission Customer or Critical Energy Infrastructure Information, the fact of the disclosure but not the information should be posted.

ii) Posting Requirements

Manitoba Hydro is required to post on their Internet Website certain information regarding the Standards of Conduct.

To comply with this requirement, Manitoba Hydro has a Notices Section Under the “Standards of Conduct” [Link To SOC external website](#) on the Internet Website as well as on their OASIS homepage that takes the user to a page with links to postings for:

(1) Standards of Conduct

The current Standards of Conduct are posted under Standards of Conduct on the Standards of Conduct page on the Internet Website. The Standards of Conduct are revised, as required, by the Compliance Officer and a representative from the Legal Services Department. Any revisions to the Standards of Conduct must be approved by the Executive Leadership Team of Manitoba Hydro.

(2) Implementation Procedures

The current written procedures implementing the Standards of Conduct are posted under Implementation Procedures on the Standards of Conduct page on the Internet Website. The *Implementation Procedures* are revised or updated, as required, by the Compliance Officer.

(3) Marketing Affiliates

Information regarding the Transmission Provider’s affiliates is posted under the heading of *Marketing Affiliates* on the Standards of Conduct page on the Internet Website. The Marketing Affiliate information is revised, as required, by the Compliance Officer.

(4) Employee-Staffed Facilities

Information regarding the Transmission Provider’s facilities shared by Transmission Function Employees and Marketing Function Employees is

posted under the heading of *Employee-Staffed Facilities* on the Standards of Conduct page on the Internet Website. The Employee-Staffed Facilities information is revised, as required, by the Compliance Officer.

(5) *Potential Merger Partners*

Information regarding the Transmission Provider's potential merger partners is posted under the heading of *Potential Merger Partners* on the Standards of Conduct page on the Internet Website. The Potential Merger Partners information is revised, as required, by the Compliance Officer.

(6) *Job Titles and Job Descriptions*

The job titles and job descriptions of Transmission Function Employees are posted under Job Titles and Job Descriptions on the Standards of Conduct page on the Internet Website. The Job Titles and Job Descriptions are revised, as required, by the Compliance Officer.

(7) *Notices*

The notices identified in the *Standards of Conduct* are *Contemporaneous Disclosures*, *Voluntary Consents*, *Employee Transfers*, *Emergency Events* and *Waivers*. Below is a description of the information that is required to be posted. The actual notices posted are under *Notices* on the [Standards of Conduct](#) page on the Internet Website. The notices are posted, as required, by the Compliance Officer.

(a) *Contemporaneous Disclosures*

Certain information regarding the Transmission Provider's contemporaneous disclosures will be posted. The required information is organized under the headings of *Disclosure of Transmission Function Information* and *Disclosure of Transmission Customer Information*.

(i) *Disclosure of Transmission Function Information*

In the event that Transmission Function Information is disclosed, a notice stating the information that was disclosed will be posted immediately under *Notices*.

(ii) *Disclosure of Transmission Customer Information*

In the event that non-public Transmission Customer information or Critical Energy Infrastructure information is disclosed, a notice stating that the information was disclosed will be posted immediately under *Notices*.

(b) *Voluntary Consent*

In the event that a Transmission Customer voluntarily consents, in writing, to allow the Transmission Provider to disclose its non-public information to Marketing Function Employees, a notice of the consent, along with a statement that the Transmission Provider did not provide any preferences, either operational or rate-related, in exchange for the consent, will be posted under

Notices.

(c) Employee Transfers

In the event that a Transmission Function Employee transfers to a position as a Marketing Function Employee, or Marketing Function Employee transfers to a position as Transmission Function Employee, a notice of the employee transfer will be posted under *Notices* and will remain on the Internet website for 90 days. No such employee transfer will be used as a means to circumvent any provision of the *Standards of Conduct*. The notice will include the following information:

- ✓ name of the transferring employee;
- ✓ respective titles held while performing each function (that is, as a Transmission Function Employee and as a Marketing Function Employee); and,
- ✓ effective date of the transfer.

The following procedures are used to retain a record of meetings between Affected Employees. More detailed instructions can be found on the internal SOC website.

(8) Joint Conversation Records

A Joint Conversation Record form is required for conversations between Transmission Function Employees and Marketing Function Employees (Joint Conversations). Transmission Function Employees will follow the procedures entitled *Joint Conversation Procedures* and will complete the form entitled *Joint Conversation Record Form* and submit it to the Compliance Officer, as per the form. The Compliance Officer will retain the Joint Conversation Record for a period of five (5) years.

(9) Joint Meeting Records

A Joint Meeting Record form is required for all meetings between Transmission Function Employees and Marketing Function Employees (Joint Meetings). The Compliance Officer will be invited to all Joint Meetings.

If the Compliance Officer is available to attend the Joint Meeting, they will read the Joint Meeting Statement and complete the Joint Meeting Record form. Following the meeting, they will retain the record for a period of five (5) years.

If the Compliance Officer is not available to attend the Joint Meeting, the organizer of the Joint Meeting will follow the procedures entitled *Joint Meeting Procedures* and will complete the form entitled *Joint Meeting Record Form* and submit it to the Compliance Officer, as per the form. The Compliance Officer will post the completed form on the internal Ethics & Compliance SharePoint Site and retain the record for a period of five (5) years.

(10) **Review of Phone Logs**

Telephone conversations between the System Control Room and the Trading Floor are recorded. The Compliance Officer will follow the procedures entitled *Review of Phone Logs* and will maintain a record of the telephone conversations that are reviewed.

iii) Exclusions from Disclosure Requirements

The Transparency Rule permits Transmission Function Employees and Marketing Function Employees to exchange certain Transmission Function Information as detailed below, in which case Manitoba Hydro must make and retain a contemporaneous record of all such exchanges except in emergency circumstances. In emergency circumstances, the Transmission Provider must make a record of the exchange as soon as practicable after the fact. The record may consist of hand-written or typed notes, electronic records such as e-mails and text messages, recorded telephone exchanges, etc. The record must be retained for a period of five (5) years.

The Transmission Function Information subject to this Exclusion is as follows:

- (i) information pertaining to compliance with reliability standards applicable to Manitoba Hydro, and,
- (ii) information necessary to maintain or restore operation of the transmission system or generating units, or that may affect the dispatch of generating units.

iv) Waivers

In the event that the Transmission Provider waives a Tariff provision in favour of an Affiliate, a notice of such Waiver of a Tariff provision will be posted under **Notices**.

A Waiver is not intended to act as notification of a breach of these Standards of Conduct.

i) Training

An ELearning course has been developed to provide Manitoba Hydro employees with an understanding of the requirements of the *Standards of Conduct*. A minimum of 80% on the test is required in order to successfully complete the course. This course is to be completed annually by all Affected Employees. New employees are required to complete the training within 30 days. Other employees are encouraged to take the course. Supervisors and managers are required to identify individuals in their areas who are Affected Employees and require training. The Compliance Officer will monitor compliance with the training requirements as outlined in the *SOC Compliance Training Procedures* The link to training can be found on the SOC internal SharePoint site [Pages - Standards of Conduct \(hydro.mb.ca\)](#).

4) REQUESTS FOR TRANSMISSION INFORMATION

Requests for transmission information may be made informally to the relevant department or formally to the Transmission Service & Compliance Department Manager at TransmissionServices@hydro.mb.ca.

5) QUESTIONS OR CONCERNS

Employees should direct any questions and report any concerns to the Compliance Officer at 204-360-3072 or complianceofficer@hydro.mb.ca.

* Available in accessible formats upon request.