

# OPEN ACCESS STANDARDS OF CONDUCT



Georgia**Transmission**



Georgia**SystemOperations**

# **GTC/GSOC Standards of Conduct Policy and Procedures**

## **Objectives**

Georgia Transmission Corporation (“GTC”) and Georgia System Operations Corporation (“GSOC”) will offer transmission services to all transmission customers on a not unduly discriminatory basis.

- GTC and GSOC shall treat all transmission customers on a not unduly discriminatory basis. Associates will not grant any undue preference or advantage to any transmission customer.
- All GTC and GSOC associates engaged in system operations (transmission functions) shall function independently from any person(s) that perform Marketing Functions on behalf of our Members.
- Information sharing restrictions apply to all associates, contractors, and consultants acting on behalf of GTC and/or GSOC. The restrictions prohibit the disclosure of non-public Transmission Function Information to any Marketing Function Employee, directly or indirectly, subject to certain emergency operating conditions.
- GTC and/or GSOC will provide equal access to non-public Transmission Function Information to all of its transmission customers except in the case of confidential customer information or Critical Energy Infrastructure Information.

## **Background**

This GTC/GSOC Standards of Conduct (“SOC”) Policy and Procedures are based largely on the Federal Energy Regulatory Commission (“FERC”) Order No. 717<sup>1</sup>. FERC Order No. 717 amends the Standards of Conduct for Transmission Providers in order to make the regulations clearer and to focus the rules on the areas where there was the greatest potential for abuse. Specifically, Order 717 eliminates the concept of energy affiliates and moves from a corporate separation approach in favor of an employee functional approach.

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<sup>1</sup> Order 717 revised Part 358, Chapter 1, Title 18 of the Code of Federal Regulations (“CFR”).

## **Organizational Overview**

### ***Georgia Transmission Corporation (An Electric Membership Corporation):***

Organization's purpose is to provide reliable and competitively priced transmission and associated services to its customers. GTC employs no personnel engaged in marketing, sales or brokering.

### ***Georgia System Operations Corporation:***

Organization's purpose is to reliably and economically operate the assets of GTC and OPC to the benefit of the Members. GSOC manages and operates GTC's OASIS site. GSOC employs no personnel engaged in marketing, sales or brokering.

### ***Member(s):***

Any Georgia Electric Membership Corporation ("EMC") that has entered into a "Member Transmission Service Agreement" with GTC or any Georgia EMC who has entered into a "Member Services Agreement" with GSOC.

### ***Oglethorpe Power Corporation (An Electric Membership Corporation) ("OPC"):***

Organization's purpose is to operate and manage selected power supply resources to meet the energy needs of its EMCs. OPC employs no personnel engaged in transmission system operation, transmission reliability functions, or marketing functions.

### ***Scheduling Member Groups:***

A Scheduling Member Group ("SMG") is one or more Member EMC(s) acting collectively on power supply decisions.

### ***Consultant:***

A consultant provides services to a SMG to initiate and/or review power supply decisions and transmission arrangements.

### ***Marketer:***

A marketer acts on behalf of the SMG by conducting day-to-day operations of buying-selling, scheduling and tagging energy transactions.

The following table<sup>2</sup> shows the current relationship among the SMGs and their consultants and marketers.

TABLE 1.

Scheduling Member Group (SMG)	EMCs	Consultant	Marketer
SMG – 1	CEN, EXC, SNA, UPS, WAS	CEI	EDF Trading
SMG – 2	COL, SAT	N/A	J.P. Morgan
SMG – 3	CAR, COW, FLI, IRW, SOU, MID, OCO, OKE, OCM, SAW, TRI	EnerVision, Inc.	Southern Power
SMG – 4	ALT, AMI, CAN, COA, GRA, HAB, HAR, JEF, LIT, MIT, PLA, RAY, SLA, SUM, THR	Georgia Energy Cooperative	Constellation Energy
SMG – 5	GRE	N/A	Morgan Stanley
SMG – 6	JAC	GDS Associates	Morgan Stanley
SMG – 7	WAL	N/A	Morgan Stanley
SMG – 8	COB	N/A	Southern Power
SMG – 9	DIV	N/A	Morgan Stanley

## Definitions

**Critical Energy Infrastructure Information<sup>3</sup>:** means specific engineering, vulnerability, or detailed design information about proposed or existing critical infrastructure that: (1) relates details about the production, generation, transportation, transmission, or distribution of energy; (2) could be useful to a person in planning an attack on critical infrastructure; (3) is exempt from mandatory disclosure under the Freedom of Information Act, 5 U.S.C. 552; and (4) does not simply give the general location of the critical infrastructure.

<sup>2</sup> SMG information is accurate as of this printing and is subject to change.

<sup>3</sup> Order 630 revised Part 388.113(c)(1), Title 18 of the Code of Federal Regulations (“CFR”).

**Marketing Functions:** 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, or financial or physical transmission rights, all as subject to an exclusion for bundled retail sales, including sales of electric energy made by providers of last resort (POLRs) acting in their POLR capacity.

**Marketing Function Employee:** An employee, contractor, consultant, or agent who actively and personally engages on a day-to-day basis in Marketing Functions.

**OASIS:** Open Access Same-time Information System, the primary means for a Transmission Provider to post crucial operating and capacity information for all customers to view simultaneously.

**Transmission Functions:** The planning, directing, organizing, or carrying out of day-to-day transmission operations, including the granting and denying of transmission service requests.

**Transmission Function Employee:** means an employee, contractor, consultant, or agent of a Transmission Provider who actively and personally engages on a day-to-day basis in Transmission Functions.

**Transmission Function Information:** means information about the GTC transmission system and/or the Georgia Integrated Transmission System, or the system of another Transmission Provider that concerns Transmission Functions and is not available to all users through an OASIS or internet website, or that is not otherwise generally available to the public without restriction. This data can include, but is not limited to, past, present and future information about:

- Day-to-day planning or system operations
- Line maintenance and other outages
- Available transmission capacity
- Scheduling data
- Customer financial information
- Transmission contracts and agreements
- Pricing or cost data

**Transmission Provider:** is any public utility that owns, operates, or controls facilities used for the transmission of electric energy in interstate commerce.

## **Applying the definitions to GTC/GSOC/OPC Associates:**

### **A. Who are Marketing Function Employees?**

A Marketing Function Employee includes any employee, contractor, consultant, or agent who actively and personally engages on a day-to-day basis in Marketing Functions.

Performing certain marketing activities does not, by itself, make an employee a Marketing Function Employee. These activities include:

- Arranging ancillary services, when calling on its own resources for ancillary service purposes for its own use;
- Generation-related resource planning;
- Making transmission reservations and scheduling transmission;
- Generating operations;
- Involvement by managers and officers in corporate governance.

If an associate believes that his/her job function is such that they meet the definition of a Marketing Function Employee, they have an obligation to immediately notify the appropriate Chief Compliance Office listed under “Compliance Officers, OASIS Website and General Information.”

The marketers identified in Table 1 perform Marketing Functions on behalf of the GTC/GSOC’s Members. The employees of the marketers identified in Table 1 should be treated as Marketing Function Employees under the GTC/GSOC SOC.

### **B. Who are GTC/GSOC’s Transmission Function Employees?**

A Transmission Function Employee includes any person engaged in day-to-day operation of the electric transmission system, including but not limited to the granting and denying of transmission service requests, real-time operations, coordinating the actual physical flows of power and imposing transmission load relief. Further, personnel engaged in “granting or denying transmission service requests” are transmission function employees regardless of the duration of service requested.

Performing certain transmission activities does not, by itself, make an employee a Transmission Function Employee. These activities include:

- Long range planning regarding the transmission system;
- Integrated resource planning;
- Field maintenance and construction work;
- Service on an isolated occasion to perform Transmission Functions, generally under emergency conditions;
- Involvement by managers and officers in corporate governance.

Based on an analysis of the definition and GTC/GSOC activities, it has been determined that the following GSOC and GTC departments do engage in Transmission

Functions and thus the associates of these departments are considered Transmission Function Employees:

**GSOC – Control Area Operations**

**GSOC – Operations Engineering**

**GSOC – Transmission Operations**

**GTC – Bulk System Planning**

**GTC – System Services Department**

**GTC – Interconnection Services**

Other GTC associates who coordinate their activities with GSOC's day-to-day operations of the transmission system are considered Transmission Function Employees.

### **Who is the Transmission Provider?**

GTC is to be considered a Transmission Provider for the purposes of these Standards of Conduct, however GTC is not a public utility under FERC's jurisdiction.

## **Compliance Officers, OASIS Website and General Information**

GTC's Chief Compliance Officer is:

Angela Sheffield

VP, General Audit/Chief Regulatory Compliance Officer

770-270-7910

[angela.sheffield@gatrans.com](mailto:angela.sheffield@gatrans.com)

GSOC's Chief Compliance Officer (Transmission Operations) is:

Paul Turner

Director, Power Delivery

770-270-7493

[paul.turner@gasoc.com](mailto:paul.turner@gasoc.com)

GTC/GSOC SOC Policy Administrator is:

Patrick McGovern

Manager, System Services

770-270-7940

[patrick.mcgovern@gatrans.com](mailto:patrick.mcgovern@gatrans.com)

GTC Transmission Function Information available to the public is posted on the OASIS. Customers and regulators can access the OASIS at <https://www.oasis.oati.com/gtc/index.html>.

General information concerning both GTC and GSOC can be found on the OASIS home page at <https://www.oasis.oati.com/gtc/index.html>. Additional information can be requested from the individuals listed above.



## **Implementing the Standards of Conduct**

### **Independent Functioning**

Person(s) who perform Marketing Functions are prohibited from conducting Transmission Functions or reliability functions on behalf of GTC/GSOC. Such persons are also prohibited from having access to the GSOC control centers or similar facilities used for transmission operations or reliability functions. In order to limit the possibility of inadvertent violations of GTC/GSOC SOC, Transmission Function Employees and Marketing Function Employees must limit their physical movement between the two designated functional areas. Physical access to the GSOC control centers are controlled via an access card entry system. No Marketing Function Employee will have access to the GSOC control centers.

### **Employee Transfers**

Transfers between Transmission Function Employees and Marketing Function Employees will be posted on the OASIS, will remain posted for 90 days, and will include the following information:

- (1) Name of employee(s);
- (2) Respective titles held while performing each job function; and
- (3) Effective date of transfer

### **Information Access**

Marketing Function Employees will not obtain Transmission Function Information (including information about available transmission capability, price, curtailments, and the like) that is not publicly available to all other OASIS users. Marketing Function Employees may, however, seek information concerning transmission services by following the same procedures required of all other transmission customers and OASIS users.

#### *Sharepoint*

GTC and GSOC utilize SharePoint, an access-controlled information management system used by the Family of Companies to manage company documents, data and other corporate information. Associates will not use SharePoint to share, nor disclose, any Transmission Function Information with Marketing Function Employees, unless the information has been posted on the GTC OASIS.

### **Information Disclosure**

GTC/GSOC associates will not divulge Transmission Function Information to Marketing Function Employees unless such information is publicly available through OASIS.

Examples of such information include, but are not limited to, the following:

- Day-to-day planning or system operations
- Line maintenance and other outages
- Available transmission capacity
- Scheduling data



- Customer financial information
- Transmission contracts and agreements
- Pricing or cost data

GTC/GSOC associates will not share any market information with Marketing Function Employees, except to the limited extent information is required to be posted on OASIS in response to a request for service.

If a GTC/GSOC associate discloses to a Marketing Function Employee any information in a manner contrary to GTC/GSOC SOC, the fact that the disclosure occurred will be immediately posted on the OASIS.

If a transmission customer voluntarily consents, in writing, to allow GTC/GSOC to share the customer's information with Marketing Function Employees, GTC/GSOC must post notice on the OASIS of that consent along with a statement that GTC/GSOC did not provide any preferences, either operational or rate-related, in exchange for that voluntary consent.

GTC/GSOC associates will not act as a conduit nor use anyone as a conduit for sharing Transmission Function Information or information acquired from transmission customers with Marketing Function Employees.

Transmission Function Information may be shared with GTC/GSOC Members (EMCs) and their employees if such employees are not actively and personally involved on a day-to-day basis in the sale for resale of electric energy; however, they should not be a conduit for transmitting prohibited information to Marketing Function Employees.

No GTC or GSOC associate, contractor, or consultant may disclose any Transmission Function Information through non public communications conducted off the OASIS to Marketing Function Employees. Should a GTC or GSOC associate, contractor, or consultant discloses, in a manner contrary to this policy, non-public Transmission Function Information, a notice that the Transmission Function Information was disclosed shall be posted on OASIS.

### **Meeting Protocol**

GTC/GSOC associate(s) who chair meetings should determine whether the agenda and meeting invitees are compatible with GTC/GSOC SOC when discussions involve Transmission Function Information. A recommended business practice is for the senior-most meeting attendee to determine if there are any potential conflicts. They should seek Marketing Function clarification from the other attendees if necessary.

### **Tariff Implementation**

GTC/GSOC will apply and enforce tariff provisions related to transmission services in a fair and impartial manner towards any transmission customer, including the GTC/GSOC Members.

GTC or GSOC will not give preference to sales for resale to any wholesale customer over the interests of any other wholesale customers in matters that pertain to the purchase or sale of transmission service.

All discounted ancillary services will be posted on OASIS and made available to all transmission customers.

### **Written Procedures**

GTC/GSOC will maintain on its OASIS and in the offices of the GTC System Services Department, 2100 East Exchange Place, Tucker, GA 30084, written procedures implementing GTC/GSOC SOC in such detail as will enable its associates and customers to understand how GTC/GSOC maintains compliance.

### **Emergency Operations**

Under emergency operating conditions which affect system reliability, Transmission Function Employees will take whatever steps that are deemed necessary to keep the system in operation consistent with applicable policies.

Any actions taken in the event of an emergency that cause GTC/GSOC to deviate from GTC/GSOC SOC requirements shall be posted on the OASIS within 24 hours of the deviation.

### **Written Procedures for Implementing The Standards of Conduct**

These written procedures have been developed by GTC/GSOC to implement GTC/GSOC SOC.

GTC/GSOC SOC are the rules by which GTC/GSOC will conduct GTC's transmission services business. GTC/GSOC SOC will not unduly discriminate when providing access to transmission system information. Associates are required to contact their manager immediately if they have a question about GTC/GSOC SOC or if they suspect any violation (even if inadvertent) has occurred. Suspected violations must be reported immediately to one of the Chief Compliance Officers. If deemed appropriate, the Chief Compliance Officer will notify the OASIS Administrator in the GTC System Services Department and the other Chief Compliance Officer so that appropriate disclosures can be made on the OASIS in a timely manner. GTC and GSOC associates will be notified via e-mail of any changes in the violations reporting procedures. An associate's failure to comply with GTC/GSOC SOC may result in disciplinary action up to and including termination.

The OASIS Administrator in the GTC System Services Department is responsible for the following activities:

1. Administration and compliance with the written procedures and GTC/GSOC SOC.
2. Posting notices of:
  - a. Transfers of Transmission Function Employees to positions of Marketing Functions,
  - b. Transfers of Marketing Function Employees to positions of Transmission Functions.
3. Assisting the Human Resources Department with the computerized tracking of GTC and GSOC associates who have received the GTC/GSOC Standard of Conduct Training and for contractors and others who must sign the Standards of Conduct Acknowledgement form described below.

The GTC System Services Department / GSOC Operations Engineering are responsible for the training of GTC/GSOC SOC to associates to ensure that they are aware of issues related to GTC/GSOC SOC, thereby avoiding violations.

The GTC Contracts Administration Department is responsible for the distribution of GTC/GSOC SOC to GTC's contractors to ensure that they are aware of issues related to GTC/GSOC SOC, thereby avoiding violations. In the contract documents, these contractors agree to read and ensure their employees and subcontractors comply with GTC's policies outlined in the Standards of Conduct and any amendments.

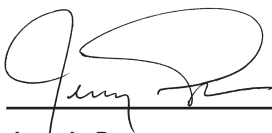
GTC/GSOC will post on its OASIS job descriptions indicating which associates are engaged in Transmission Functions.

Physical access to the GSOC control centers are controlled via an access card entry system. No Marketing Function Employee has access to the GSOC control centers.

Confidential documentation and information pertaining to Transmission Functions, system operations and reliability are to be maintained in secured areas and secured password-protected personal computers. Only personnel engaged in Transmission Functions, system operations and reliability functions have access to such files.

GTC and GSOC each have LAN servers for file and print services to which only employees and contractors of that company have access. A login ID and password are required to obtain access on each server. Furthermore, associates can access only the data that their ID has been granted rights to access. GSOC is responsible for the real-time SCADA and for implementing and maintaining information access and display controls.

## Signatures

A handwritten signature in black ink, appearing to read "Jerry L. Donovan", written over a horizontal line.

**Jerry L. Donovan**  
President and CEO  
Georgia Transmission Corporation

A handwritten signature in black ink, appearing to read "Gregory S. Ford", written over a horizontal line.

**Gregory S. Ford**  
President and CEO  
Georgia System Operations Corporation





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