



# **Avangrid Networks**

## **FERC STANDARDS OF CONDUCT**

### **2021 Annual Training**

# Purpose of this Training

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The Federal Energy Regulatory Commission (FERC), the federal government agency that regulates electric transmission utilities such as Avangrid, enforces a set of rules called the Standards of Conduct.

The Standards of Conduct are designed in part to prevent an electric transmission utility from giving preferential access to certain information to its own marketing employees and certain affiliates.

FERC **requires** annual Standards of Conduct training for certain Avangrid employees:

- Non-compliance with the Standards of Conduct could result in a **penalty** to Avangrid of up to \$1 million per day.
- Compliance is part of your job. Employees who deliberately violate these Standards will be referred to Human Resources for disciplinary measures.

# Avangrid Standards of Conduct Compliance Organization

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In order to ensure that Avangrid complies with the FERC Standards of Conduct, and to help you with your compliance responsibilities, Avangrid has set up the following Compliance Organization:

## Avangrid Networks

**Noelle M. Kinsch**

Chief FERC Compliance Officer

Phone: 585-484-3978

Email: [noelle.kinsch@avangrid.com](mailto:noelle.kinsch@avangrid.com)



## United Illuminating, Central Maine Power & MEPCO

**Alexander Novicki**

Coordinating Compliance Manager

Phone: (203) 499-3669

Email: [alexander.novicki@avangrid.com](mailto:alexander.novicki@avangrid.com)

## RG&E and NYSEG

**Tim Lynch**

Coordinating Compliance Manager

Phone: (585) 484-6352

Email: [tjlynch@nyseg.com](mailto:tjlynch@nyseg.com)

# Core Components

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The following are the four core rules of the Standards of Conduct:

- **No Conduit Rule**: Transmission companies, such as Avangrid, are prohibited from using anyone as a conduit for the disclosure of ***Non-Public Transmission Information*** to its ***Marketing Employees***.
- **Transparency Rule**: If Avangrid discloses Non-Public Transmission Information to its Marketing Employees it must immediately post the same information on its public website so that all industry market participants have equal access to the information.
- **Independent Functioning Rule**: Avangrid's personnel that commonly have Non-Public Transmission Information must work separately and independently from its Marketing Employees.
- **Nondiscrimination Rule**: Avangrid must treat all transmission customers, affiliated or nonaffiliated, in the same manner, and cannot operate its transmission system to give preference to its Marketing Employees or to an affiliate.

# What is Non-Public Transmission Information?

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**Non-Public Transmission Information** is information that is not yet publicly known related to the planning, directing, organizing or carrying out of day-to-day transmission functions, including:

- **Transmission line outages;**
- **Future transmission outage plans and maintenance activities;**
- **Available transmission capacity or similar measurements;**
- **The price of transmission (interconnection and ancillary services); and**
- **Granting or denying transmission service requests.**

If this information is later posted on a public website, such as those listed below, it becomes public information, and therefore is no longer considered Non-Public Transmission Information:

- **Website of the Independent System Operator of New England;**
- **Website of the New York Independent System Operator;**
- **Website of the Connecticut Valley Exchange; and**
- **Open Access Same-time Information System.**

# Who are Avangrid's Marketing Employees?

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Non-Public Transmission Information must be secured to prevent unauthorized access by Marketing Employees. The below are Avangrid Marketing Employees.

## New York State Electric and Gas / Rochester Gas & Electric (Binghamton, NY)

- Employees within the Electric Supply A department
- Employees within the Electric Supply B department

## United Illuminating (Orange, Connecticut)

- General Manager - GenConn Energy

## Avangrid Renewables (Portland, Oregon)

- Employees within the Power Trading department

# Your Responsibilities

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**Non-Public Transmission Information must not be communicated to Marketing Employees by anyone or by any means.**

- This includes using any employee, external contractor / consultant / lawyer / agent as a conduit to communicate such information [No-conduit rule].
- If you have Non-Public Transmission Information you must work separately from Marketing Employees and protect that information from inadvertent disclosure [Independent Functioning Rule].
- Marketing Employees must be excused from any meeting or teleconference where Non-Public Transmission Information is being addressed [Independent Functioning Rule].
- If you have an email containing Non-Public Transmission Information you must not forward it to Marketing Employees [No-conduit rule].
- Marketing Employees must not be allowed access into areas that are conducting transmission functions, such as the Energy Control Centers [Independent Functioning Rule].
- Marketing Employees must not conduct transmission functions, and employees who have Non-Public Transmission Information must not conduct marketing functions [Independent Functioning Rule].
- Our transmission system must not be operated in a way that unfairly benefits our own marketing activities. All similar requests for transmission service, affiliated or non-affiliated, must be processed in the same manner and within the same period of time [Nondiscrimination Rule].

# Use of the Meeting Disclaimer Statement

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To help prevent an inadvertent disclosure of Non-Public Transmission Information during a meeting that includes Marketing Employees, it is recommended to announce the following Disclaimer at the beginning of the meeting:

**Joint Transmission and Marketing Standards of Conduct Disclaimer  
(Last Revised 10/1/2018)**

**This meeting includes Avangrid Transmission Function employees and Marketing Function employees. We will not discuss specific non-public transmission projects/operations, including information concerning the planning, directing, organizing, or carrying out of day-to-day transmission operations, including the granting and denying of transmission service requests. Any transgressions should be clearly identified and noted in the minutes of this meeting and appropriately posted on the Avangrid Networks OASIS site.**



# When You Should Ask for Help

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Contact the Avangrid Compliance Organization in the following situations:

- If you are unsure whether something is Non-Public Transmission Information;
- If you are unsure if someone is a Marketing Employee;
- If you plan to transfer into a Marketing employee job from a job that utilized Non-Public Transmission Information;
- If you have any other questions or concerns.

**Note:** There are certain very limited exceptions to the Standards of Conduct. For instance, Non-Public Transmission Information might be communicated to resolve certain operational situations, or a transmission customer may consent in writing to allow communication of their Non-Public Transmission Information. Never use an exception without first contacting someone in the Compliance Organization.

# Reporting Violations

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If you suspect or have knowledge of a Standards of Conduct violation, or believe a violation will occur in the future, you **must** immediately report it.

You can report the violation to either:

- Your supervisor, who must immediately report it to one of the below choices;
- Someone in the Avangrid Compliance Organization;
- The Helpline at 877-606-9171; or
- Online at [avangrid.com/speakup](https://www.avangrid.com/speakup) if you wish to remain anonymous.

Timing is critical – FERC can impose penalties if a company unreasonably delays reporting a violation.

The violation will be investigated, and if warranted, may be immediately posted on Avangrid’s website so that the information becomes public. [Transparency Rule].

**Note:** If there is an emergency affecting safety or reliability, first address the emergency regardless of the Standards of Conduct. If a violation occurred during the emergency report it immediately after the emergency has been resolved.

# Standards of Conduct Web-Page

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**Standards of Conduct information can also be found on the Avangrid Networks web-site, including the:**

- **Compliance Policy and Plan**
- **Compliance Org Chart**
- **This Training Material**
- **List of Marketing Employees**
- **Meeting Disclaimer Statement**


**(Path: Corporate Governance -> Compliance Program -> FERC Standards of Conduct)**

Avangrid Networks Chief FERC Compliance Officer and General Counsel

Noelle M. Kinsch

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Email: [noelle.kinsch@avangrid.com](mailto:noelle.kinsch@avangrid.com)

Help Line: [1-877-606-9171](tel:1-877-606-9171) or [avangrid.ethicspoint.com](http://avangrid.ethicspoint.com) 



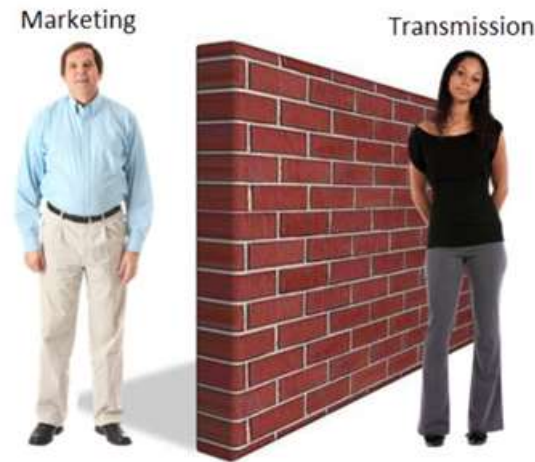
- [Compliance Policy and Plan \[PDF\]](#) 
- [Standards of Conduct Compliance Organization Chart](#)
- [Contemporaneous Disclosures](#)
- [Voluntary Consents](#)
- [Affiliates With Marketing Function Employees](#)
- [Shared Facilities](#)
- [Potential Merger Partners with Market Function Employees](#)
- [Transmission Function Job Titles & Descriptions](#)
- [Employee Transfers](#)
- [Waivers of Tariff Provision – Including Discounts](#)
- [Standards of Conduct Training Material \(abridged version only\) \[PDF\]](#)
- [Avangrid Market Function Employees](#)
- [Meeting Disclaimer Statement](#)



# Key Takeaways

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**Non-Public Transmission Information, such as transmission outages, must not be communicated to Marketing Employees.**



**The transmission system cannot be operated in a manner that unfairly favors our marketing activities.**

**Any actual or suspected violations to the Standards of Conduct must be immediately reported.**

**Avangrid's Compliance Organization is available for your questions or concerns.**

# Standards of Conduct Quiz

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1.) Which information below may be considered Non-Public Transmission Information?

- A distribution line outage not posted on a public web-site
- A transmission line outage not posted on a public web-site
- A transmission line outage posted on a public web-site

2.) To help avoid the disclosure of Non-Public Transmission Information during a meeting that includes Marketing Employees, it is recommended that you:

- Cancel the meeting
- Invite your Coordinating Compliance Manager to the meeting
- Read the Standards of Conduct Disclaimer to the attendees at the start of the meeting

3.) You accidentally emailed Non-Public Transmission Information to a Marketing Employee. What should you immediately do?

- Notify the Marketing Employee's supervisor
- Report the disclosure to either your supervisor, the Compliance Organization, or to the Helpline
- Recall your email

4.) The full Avangrid Networks Standards of Conduct Compliance Policy and Plan can be found on:

- Website of the Independent System Operator of New England
- Online at [ethicspoint.com](http://ethicspoint.com)
- The Avangrid Networks web-site

5.) A transmission line outage was restored earlier than originally publicly reported. What must you be careful not to do?

- Disclose the information to a Marketing Employee
- Disclose the information to the Chief FERC Compliance Officer
- Disclose the information to a Coordinating Compliance Manager

# Standards of Conduct Quiz - Answers

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