

## **Northern Tier Standards of Conduct Policy and Safeguards**

The following policy statement should be adopted by the Northern Tier Steering Committee, and acknowledged at the beginning of every Northern Tier meeting.

### **Northern Tier Standard of Conduct Policy**

It is the policy of the Northern Tier Transmission Group ("Northern Tier") not to facilitate the improper distribution of non-public transmission information. In furtherance of this policy, no participant in any Northern Tier meeting shall discuss non-public transmission information unless Northern Tier's Standards of Conduct Safeguards are satisfied."

The following Standards of Conduct Safeguards should be adopted by the Northern Tier Steering Committee.

### **Northern Tier Standard of Conduct Safeguards**

The Steering Committee of the Northern Tier Transmission Group ("Northern Tier") has adopted a series of general procedures to safeguard against its meetings facilitating a violation of the Federal Energy Regulatory Commission's standards of conduct." These procedures are as follows:

- A. If the meeting is to be attended by only individuals classified by Federal Energy Regulatory Commission standards of conduct regulations as "transmission function" or "shared" employees, the meeting can occur without satisfying the procedures set forth in subsection "B" and "C" below.
- B. If a Steering Committee meeting is attended by individuals classified by Federal Energy Regulatory Commission standards of conduct regulations as "transmission function" and either "Marketing Affiliate" or "Energy Affiliate," the meeting can not occur without satisfying the procedures set forth below.
  1. The individuals classified as "transmission function" and either "Marketing Affiliate" or "Energy Affiliate" may not be from the same utility.
  2. No non-public transmission information shall be disclosed during the meeting.
  3. The Chief Compliance Officer ("CCO") of the transmission function employees attending the meeting shall be advised of the agenda prior to the meeting.
  4. Even if all the above standards are satisfied, the transmission provider's CCO retains the discretion to (a) prohibit the transmission provider's Transmission Function employees from attending the meeting, (b) prohibit the transmission provider's Transmission Function employees from presenting transmission information during the meeting, and (c) place any other conditions on its transmission function employees as the CCO believes are necessary.
- C. If any meeting, other than as set forth in section "B" above, is to be attended by individuals classified by Federal Energy Regulatory Commission standards of conduct regulations as "transmission function" and either "Marketing Affiliate" or "Energy Affiliate," the meeting may not occur without satisfying the procedures set forth below.

1. Advance notice of a public meeting at which transmission information will be disclosed must be posted on the transmission provider's OASIS at least 10 business days prior to the meeting.
2. All "Eligible Customers," as that term is defined in the *pro forma* OATT, must be invited to attend the public meeting.
3. Telephone participation must be provided.
4. If handouts are going to be provided during the meeting, the handouts must be posted on OASIS prior to the start of the meeting, and a contact person must be identified to assist with problems downloading the materials.
5. Meeting notes must be taken during the meeting by an individual approved as the note-taker by the transmission provider's Chief Compliance Officer ("CCO").
6. Meeting notes must be promptly posted on OASIS following the conclusion of the meeting.
7. If the meeting is attended by employees of the transmission provider's Marketing Affiliate or Energy Affiliate, then a representative of at least one additional Eligible Customer must be in attendance at the meeting during the entire period that the Marketing Affiliate or Energy Affiliate employees are in attendance.
8. Without prior approval by the transmission provider's CCO, meetings may not occur more than twice per month.
9. Even if all the above standards are satisfied, the transmission provider's CCO retains the discretion to (a) prohibit the transmission provider's Transmission Function employees from distributing transmission information at the meeting, (b) prohibit the transmission provider's Transmission Function employees from presenting transmission information during the meeting, and (c) place any other conditions on its transmission function employees as the CCO believes are necessary.