

Dominion Energy South Carolina, Inc.
FERC Standards of Conduct
Implementing Procedures



Introduction

Dominion Energy is committed to ensuring its employees conduct business in compliance with all applicable regulations and policies of the Federal Energy Regulatory Commission (“FERC”).

These implementing procedures (“Procedures”) are designed and implemented to specifically address the Standards of Conduct (“SOC” or “Standards”) requirements set forth in 18 C.F.R 358 for Dominion Energy South Carolina (“DESC”)¹

Principles

The Standards govern the relationship between Transmission Providers (both electric and natural gas) and their customers (affiliated and non-affiliated).

The elements of the Standards are as follows:

- Non-Discrimination Requirement requires a Transmission Provider to treat all transmission customers, affiliated and non-affiliated, in a non-discriminatory manner and to provide equal access to Non-Public Transmission Information (“NPTI”).
- Independent Functioning Rule requires Transmission Function and Marketing Function Employees (“MFEs”) to operate independently of each other and requires that MFEs not have access to transmission facilities.
- No-Conduit Rule prohibits passing of NPTI to Marketing Function Employees.
- Transparency Rule imposes posting requirements for the Transmission Provider.

Oversight

Dominion Energy has designated Morenike K. Miles, Esq. as its Chief Compliance Officer (“CCO”). Ms. Miles can be contacted in writing at 120 Tredegar Street, Richmond, VA 23219. Her telephone number is (804) 385-9539 and her email address is Morenike.K.Miles@dominionenergy.com.

For DESC, Ms. Miles has appointed Catherine D. Taylor as her designee. Ms. Taylor can be contacted at CATHERINE.TAYLOR@dominionenergy.com or (803) 217-9356

Reporting

Dominion Energy employees can seek guidance, or report potential or actual violations, by contacting the CCO or by utilizing the following mechanisms:

¹ These procedures are specific to DESC. Dominion Energy has posted separate procedures to implement SOC for its other Transmission Providers.

Senior Regulatory Compliance Coordinator
Mary C. Salane-Walker
Mary.Salane-Walker@dominionenergy.com;
(803) 217-8110

Anonymous Reporting
Dominion Energy (DE) Hotline
1-800-628-1798 or www.DConcern.com

FERC Enforcement Hotline
Hotline@ferc.gov
(888) 889-8030

Policy Against Retaliation

Dominion Energy has a strict policy prohibiting retaliation against any individual who comes forward with a good faith report of alleged wrongdoing or who participates in an investigation. Suspected retaliation should be reported immediately to the CCO. Individuals who retaliate will be disciplined, which could include termination of employment. In certain instances, those found guilty of retaliation could be subject to criminal prosecution.



**DESC Standards of Conduct
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Appendix A
to
DESC Standards of Conduct
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Definitions

Affiliate of a specified entity means:

(1) Another person that controls or is controlled by or is under common control with, the specified entity. An Affiliate includes a division of the specified entity that operates as a functional unit.

(2) "Control" as used in this definition means the direct or indirect authority, whether acting alone or in conjunction with others, to direct or cause to direct the management policies of an entity. A voting interest of 10 percent or more creates a rebuttable presumption of control.

FERC Classification refers to DESC method for identifying employees' responsibilities under the Standards of Conduct. FERC Classifications correlate with an employee's job functions.

Internet Website refers to the Internet location where a public utility posts the information, by electronic means, required under by the Standards of Conduct. DESC utilizes the Open Access Same Time Information Systems ("OASIS").

Marketing Function (electric) refers to making transactions for the sale for resale 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; subject to exclusion for bundled retail sales.

Marketing Function Employee ("MFE") means an employee, contractor, consultant or agent of a Transmission Provider or of an Affiliate of a Transmission Provider who actively and personally engages on a day-to-day basis in marketing functions. Dominion Energy identifies these employees with a FERC Classification of "Marketing Affiliate"

Non-Public Transmission Information ("NPTI") – means information relating to transmission functions that are not posted on OASIS. Examples of transmission function information includes, but is not limited to, available transmission capability, price, curtailments, ancillary services, balancing, maintenance activities, expansion plans, transmission customer and prospective customer information, transmission outages both planned and unplanned, system maintenance activity, design and expansion plans such as new construction and system upgrades, and detailed system diagrams and maps such as some information in GIS. There is no distinction between historical, future or real-time information.

Tariff is a document, approved by the FERC which lists the binding terms and conditions, including price, under which utility services will be provided. A FERC regulated tariff is intended to ensure transmission services are provided on a basis that is just, reasonable and not unduly discriminatory or preferential.

Transmission means electric transmission, network or point-to-point service, ancillary services or other methods of electric transmission, or the interconnection with the FERC jurisdictional transmission facilities.

Transmission Customer means any eligible customer, shipper or designated agent that can or does execute a transmission service agreement or can or does receive transmission service, including all persons who have pending requests for transmission service or for information regarding transmission.

Transmission Functions means 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. Dominion Energy identifies these employees with a FERC Classification of "Transmission"

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

Waiver means the determination by a Transmission Provider, if authorized by its Tariff, to waive any provisions of its tariff for a given entity.

Appendix B to DESC Standards of Conduct Implementing Procedures

Training

I. Procedure Overview

Dominion Energy South Carolina (“DESC”) is required by the Federal Energy Regulation Commission, (“FERC”) under 18.C.F.R. Part 358.8(c), (“Standards of Conduct” or “Standards”) to provide annual training on the Standards to all Transmission Function Employees (“TFEs”), Marketing Function Employees (“MFEs”), officers, directors, supervisory employees, and any other employees likely to become privy to transmission function information. In addition, DESC must provide training for new employees in these categories within thirty (30) days of their hire.

DESC is also required to provide the above training to similar contractors or agents (“Contractors”) of Dominion Energy.

II. Responsibilities

The **Chief Compliance Officer (“CCO”)** will develop training material, determine rosters, approve administration methods, and reconcile completion of training.

Any **Employee** or **Contractor** identified by the CCO as needing training must complete such training within the established time period.

The **Human Resources Department (“HR”)** will ensure new employees attend Standards training within thirty (30) days of being hired.

The **Dominion Energy Contact (“Contact”)** will ensure their associated Contractors are listed in Dominion Energy’s Non-Employee Database (“NED”) and have completed the Supplier Authorization Form (“SAF”). In addition, the Contact will be responsible for coordinating their associated Contractor(s) completion of annual training required by the CCO.

III. Training Material

The CCO will develop and maintain training material which:

- Communicates the Standards in a clear and easily understood manner.
- Ensure Employees and Contractors understand their obligations and whom to contact for questions, or to report potential violations.
- Communicates Dominion Energy’s expectations for Employees and Contractors to adopt the corporation’s commitment to full compliance.

IV. Newly Hired Employee Training

The CCO, or designee, shall administer training for newly hired employees of the Dominion Energy Southeast Energy group¹, which includes DESC, at New Employee Orientation (“NEO”). HR is required to ensure all newly hired employees attend NEO within thirty (30) days of being hired. Employees’ training records will be maintained in PeopleSoft.

V. Newly Hired Contractor Training

¹ Dominion Energy’s Southeast Energy Group is comprised of the following Dominion Energy entities which employ employee personnel: Dominion Energy South Carolina, Public Service Company of North Carolina, Inc., SCANA Energy Marketing, and Dominion Energy Southeast Energy Group Services Company, Inc.

The CCO provides newly hired Contractors of the Dominion Energy Southeast Energy Group (including DESC) training via the SAF. The SAF contains training material and requires a Contractor to sign acknowledging they have reviewed such material. The Contact is required to obtain a completed SAF from their associated Contractor on or before the Contractor's arrival date. Completed SAFs will be maintained in NED.

VI. Annual Employee Training

- a. Utilizing PeopleSoft, the CCO will annually develop a roster of Employees requiring training.
- b. The CCO may utilize a variety of methods to administer training (In-person, CBT, *etc.*). Training shall only be administered as approved by the CCO. Employees are required to certify their completion of the training by utilizing certificates provided by the CCO or by electronically certifying when such method is provided and approved by the CCO. Certificates shall be forwarded to the CCO by either the employee or the facilitator of the training.
- c. Employees' training records will be updated in PeopleSoft to reflect completion of training.

VII. Annual Contractor Training

- a. Utilizing NED, the CCO will annually develop a roster of Contractors requiring training.
- b. The CCO may utilize a variety of methods to administer training (In-person, CBT, *etc.*). Training shall only be administered as approved by the CCO.
- c. The CCO may require the Contact to coordinate training for their respective Contractors.
- d. Contractors are required to certify their completion of the training by utilizing certificates provided by the CCO or by electronically certifying when such method is provided and approved by the CCO. Certificates shall be forwarded to the CCO by either the Contractor or Contact.
- e. The CCO will maintain Contractor training records.

VIII. Documentation

The CCO's Office will maintain all documentation necessary to support the Employees' and Contractors' training records for a minimum of five (5) years.

Revision History

Version	Date	Performed By:	Description
1.0	01/13/13	Kevin Painter	Reformatting of procedure and inclusion of versioning.
2.0	02/01/15	Kevin Painter	Removed references to CGT. Updated to include information concerning Contractors.
3.0	05/06/19	Kevin Painter	Updated to reflect name changes and other administrative edits.

Appendix C
To
DESC Standards of Conduct
Implementing Procedures

Physical Access Restriction

I. Procedure Overview

Dominion Energy South Carolina (“DESC”) is required by the Federal Energy Regulatory Commission (“FERC”) under 18 C.F.R. Part 358.2(d) and 358.5(b)(1)(ii) (“Standards of Conduct” or “Standards”) to provide equal access to Transmission Information to all transmission customers, affiliated and non-affiliated, and to ensure Marketing Function Employees (“MFEs”) do not have access to the system control centers or similar facilities used for transmission operations that differs in any way from the access available to other transmission customers.

This procedure outlines Dominion Energy’s processes for identifying physical locations where Non-Public Transmission Information (“NPTI”) is located and processes for ensuring access is appropriately restricted.

II. Responsibilities

Management of DESC (“Transmission Management”) will identify physical locations where NPTI is located (“Transmission Restricted Areas” or “TRAs”) and will establish access controls to ensure compliance with the Standards.

Corporate Security (“Corporate Security”) will manage access processes for TRAs utilizing electronic badging. Corporate Security will ensure monitoring tools are developed and implemented to demonstrate compliance with the Standards.

The **Chief Compliance Officer (“CCO”)** will maintain and control the list of card readers utilized by Corporate Security for monitoring purposes.

The **Transmission Compliance Administrator (“TCA”)** will maintain a list of physical locations containing NPTI and ensure periodic reviews are conducted by Transmission Management.

III. Identification

- a. The TCA will maintain a list of TRAs identified by Transmission Management. The list will identify the locations and associated access controls (*i.e.* badge readers, lock and key, key pad) as well as designate the employees that are responsible for securing the TRAs.
- b. Transmission Management will promptly notify the TCA of any changes to facilities that may affect the list.
- c. The TCA shall promptly notify the CCO of any changes to the list.
- d. Prior to NPTI occupying new facilities, Transmission Management will coordinate with the CCO to ensure appropriate access controls are implemented.

IV. Electronic Access

- a. Identification of Readers
 - i. For each TRA utilizing electronic access controls, Transmission Management, in coordination with the TCA and CCO, will identify all perimeter entryways and their associated badge reader IDs (“Readers”).
 - ii. The CCO will maintain and update the list of Readers in the Corporate Securities reporting tool.

- b. Monitoring Report
 - i. Corporate Security will run a daily automated report (“Report”) that verifies MFEs do not have access to the Readers specified by the CCO.
 - ii. The Report will be provided to the CCO.
 - iii. If the Report identifies MFE access, Corporate Security will contemporaneously make changes in EBI to remove access.
- c. Change Management
 - i. Corporate Security will ensure maintenance changes that may affect the Readers are communicated to the TCA and CCO. Corporate Security will coordinate any necessary changes to the Report.
- d. Marketing Function Employee Access Changes
 - i. Corporate Security must obtain the approval of the CCO before adding additional areas to MFE access levels. This approval is required in addition to any approval necessary from business owners.

V. Other Access Controls

For areas relying on other methods for access control, Transmission Management must work in conjunction with the CCO to develop and administer procedures for managing access.

VI. Reviews

- a. At least semi-annually the TCA will send the TRA list to an appropriate subset of Transmission Management and request they verify its accuracy. The subset will be approved by the CCO’s Office.
- b. The subset of Transmission Management is required to respond to the TCA within 10 business days.
- c. The TCA shall promptly notify the CCO’s Office of any changes to the list.

VII. Documentation

The below documentation shall be retained for a period of no less than five (5) years:

- The TCA will maintain documentation to support TRA reviews and changes.
- The CCO will maintain a copy of the Monitoring Reports

Revision History

Version	Date	Performed By:	Description
1.0	01/13/13	Kevin Painter	Reformatting of procedure and inclusion of versioning.
2.0	02/01/15	Kevin Painter	<ul style="list-style-type: none"> • Updated IV. to change frequency of quarterly reviews and limit distribution to subset. • Made additional minor updates for clarity. • Removed references to CGT. • Other minor updates.
3.0	05/06/19	Kevin Painter	Updated to reflect name changes and other administrative edits.

Appendix D
to
DESC Standards of Conduct
Implementing Procedures

Electronic Access Restriction

I. Procedure Overview

Dominion Energy South Carolina (“DESC”) is required by the Federal Energy Regulatory Commission (“FERC”) under 18 C.F.R. Part 358.2(d) and 358.5(b)(1)(ii) (“Standards of Conduct” or “Standards”) to provide equal access to Transmission Information to all transmission customers, affiliated and non-affiliated, and to ensure Marketing Function Employees (“MFEs”) do not have access to system control centers or similar facilities used for transmission operations that differs in any way from the access available to other transmission customers.

This procedure outlines Dominion Energy’s process for identifying electronic systems where Non-Public Transmission Information (“NPTI”) is located and processes for ensuring access is appropriately restricted.

II. Responsibilities

Management of DESC (“Transmission Management”) will identify electronic systems owned and managed by DESC where NPTI is located (“Transmission Owned and Managed Systems”) and establish access controls to ensure compliance with the Standards.

Information Services and Technology (“IST”) will work in conjunction with the CCO to identify systems managed by IST (“IST Managed Systems”) where NPTI is located and establish access controls to ensure compliance with the Standards.

The **Information Resource Manager (“IRM”)** will be responsible for following established IST procedures for approval and review of electronic access to IST Managed Systems.

The **Chief Compliance Officer (“CCO”)** will review IST Managed Systems for potential Standards considerations.

The **Transmission Compliance Administrator (“TCA”)** will maintain a list of Transmission Owned and Managed Systems and ensure reviews are conducted by Transmission Management.

III. Security Models

Systems containing NPTI will employ one of the following security models outlined in Section IV and V of this document.

IV. IST Managed Systems Model

IST utilizes a framework of policies and procedures to ensure systems are appropriately secured. This section provides a summary of those controls. The complete IST policies and procedures are located at <http://eportal.scana.com/DepartmentSites/ist/Pages/MAP.aspx>.

a. Identification

- i. IST requires use of a project management framework for projects where software or systems are being implemented.
- ii. “Phase 1”, or the “Idea” phase, requires the project manager to submit a “Business Case” document to the CCO. The CCO will review the Business Case and determine if the case is impacted by the FERC Standards of Conduct.
- iii. If so, the CCO will identify the system as being “FERC”.

- iv. IST will work in conjunction with the CCO to ensure that any proposed FERC systems have appropriate security measures prior to the system being placed into production.
- v. Systems are labeled as being FERC in the IST's System Information Repository (SIR).
- b. Access Authorization
 - i. FERC systems are secured by the utilization of SAR roles.
 - ii. SAR roles are assigned to the IRMs who are responsible for approving security requests.
 - iii. The IRM will be knowledgeable of the Standards and ensure user access is appropriate.
- c. Change Management
 - i. IST utilizes "Process Change Management" to identify any changes (patches, upgrades, *etc.*) affecting FERC systems.
 - ii. IST will ensure access controls are not impacted by any changes.
- d. Reviews
 - i. IST maintains a master list of the FERC systems and their corresponding SAR Roles.
 - ii. IST requires the CCO to review the list for accuracy every quarter.
 - iii. Utilizing the master list, IST requires IRMs to review user access for appropriateness quarterly.

V. Transmission Managed Systems Model

- a. Identification
 - i. Transmission Management will identify systems owned and managed by the Transmission Provider that contain NPTI or customer information.
 - ii. These systems are referred to as "Transmission Owned and Managed".
 - iii. Transmission Management will work in conjunction with the CCO to identify FERC implications for any proposed systems.
 - iv. Transmission Management will ensure appropriate user access controls are in place prior to the system being placed into production.
 - v. The TCA will maintain a list of Transmission Owned and Managed Systems and the corresponding member of Transmission Management that is responsible for authorizing and reviewing access ("Owner").
- b. Access Authorization
 - i. For each Transmission Owned and Managed System the Owner is responsible for authorizing appropriate access.
- c. Reviews
 - i. Verification of Systems
 - 1. At least semi-annually, the TCA will send the list of Transmission Owned and Managed Systems to an appropriate subset of Transmission Management. The subset will be approved by the CCO's Office.
 - 2. Within ten (10) businesses days of receipt, the subset of Transmission Management will review the list and notify the TCA if changes are needed (adding system, removing system, *etc.*).
 - ii. Verification of Access
 - 1. At least semi-annually, based on the approved list of Transmission Owned and Managed Systems, the TCA will instruct the System Owners to conduct reviews of user access.
 - 2. The System Owners will complete the review and notify the TCA of such completion along with any access changes made within ten (10) business days of receiving the request.

VI. Documentation

The below documentation shall be retained for a period of no less than five (5) years:

- The TCA will maintain documentation to support Transmission Owned and Managed reviews and any associated changes.
- Transmission Management will maintain documentation to support access changes and associated approvals.
- IST will maintain all documentation associated with IST Managed Systems Model

Revision History

Version	Date	Performed By:	Description
1.0	01/13/13	Kevin Painter	Reformatting of procedure and inclusion of versioning.
2.0	2/1/15	Kevin Painter	<ul style="list-style-type: none"> • Updated V.c.i to limit review to a subset of Transmission Management and to change the review frequency to semi-annual. • Updated V.c.ii. to define frequency as semi-annual. • Removed references to CGT. • Other Minor Updates
3.0	05/06/19	Kevin Painter	Updated to reflect name changes and other administrative edits.

Appendix E
to
DESC Standards of Conduct
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Job Titles and Descriptions

I. Procedure Overview

In compliance with Sections 358.7(f) and (g) of the Federal Energy Regulatory Commission’s (“FERC”) regulations, Dominion Energy South Carolina (“DESC”) will post on its Internet Website the job titles and descriptions of the Transmission Function Employees (“TFEs”).

DESC will update such postings within seven (7) business days of the effective date of an applicable change.

II. Responsibilities

The **Transmission Compliance Administrator (“TCA”)** will ensure the job titles and descriptions posting are accurate, updated within seven (7) business days of any change in job title and/or description, and documentation necessary to support such change is retained.

Management of DESC (“Transmission Management”) will provide the TCA with job descriptions and will conduct reviews of job title and description postings.

The appropriate **HR Generalist (“Generalist”)** will coordinate with Transmission Management and the TCA to ensure all required action items are addressed prior to making employee changes with large¹ potential impact to postings. The HR Generalist will ensure employee changes affecting the required postings are not retro dated.

The **Human Resources Department (“HR”)** will ensure that employee records are promptly added or updated in the PeopleSoft system. The HR Department will also issue the FERC Employee Changes Report (“Report”) ².

III. Notification

- a. Transmission Management will promptly notify the Generalist of any upcoming personnel change within their department.
- b. If the Generalist determines the change is large, he/she will promptly notify the TCA.
- c. If the Generalist determines the change is not large, the TCA will receive notification of the change via the Report.
- d. Retro dating of employee changes affecting required postings is NOT PERMITTED.

IV. Posting

- a. The TCA will ensure that the job title and description posting is updated within seven (7) business days from the effective date of an applicable change.
- b. The posting will be made on the Internet Website at “Standards of Conduct” “Job Titles and Descriptions”.
- c. The posting will included:
 - i. TFE job titles and descriptions
 - ii. Date for when the posting was last updated

¹ “Large” is any change that potentially impacts 3 or more posting entries.

² The Report indicates any changes to an employee’s data in HR (job title, chain of command, department, FERC Classification, etc).

- d. Transmission Management will promptly provide the TCA with any information that is necessary to complete the required update (*i.e.* job description changes, *etc.*).
- e. The TCA will notify the Chief Compliance Officer (“CCO”) and Transmission Management when posting changes have been made.

V. Review

The TCA in conjunction with appropriate Transmission Management will perform semi-annual reviews, at a minimum, of job titles and descriptions to ensure posted information is accurate.

VI. Documentation

The below documentation shall be retained for a period of no less than five (5) years:

- The TCA will maintain documentation to support job title and description reviews and any associated changes.
- The TCA will maintain documentation to support job title and description posting updates.
- HR will maintain documentation of employee job title changes.

Revision History

Version	Date	Performed By:	Description
1.0	01/13/13	Kevin Painter	Reformatting of procedure and inclusion of versioning.
2.0	02/01/15	Kevin Painter	Updated to remove references to CGT. Changed V. review period from quarterly to semi-annual.
3.0	05/06/19	Kevin Painter	Updated to reflect name changes and other administrative edits.

**Appendix F
to
DESC Standards of Conduct
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Employee Transfers

I. Procedure Overview

In compliance with Sections 358.7(f) and (g) of the Federal Energy Regulatory Commission's ("FERC") regulations, Dominion Energy South Carolina ("DESC") will post notice of any transfer of a Transmission Function Employee ("TFE") to a position as a Marketing Function Employee ("MFE"), or any transfer of a MFE to a position as a TFE, on its Internet Website.

DESC will make such postings within seven (7) business days of the effective date of an applicable change.

II. Responsibilities

The **Transmission Compliance Administrator ("TCA")** will ensure applicable transfers are posted within seven (7) business days of the effective date and remain posted for ninety (90) days and that the documentation necessary to support such posting is retained.

The **Transmission Management ("TM")** and **Marketing Management ("MM")** of the transferring employee are responsible for contacting the Chief Compliance Officer ("CCO") before the transfer occurs to ensure appropriate changes are made to electronic and physical user access.

The appropriate **HR Generalist ("Generalist")** will ensure that the transferring employee's manager notifies the CCO's Office prior to the actual employee transfer and the transferring employee's FERC Classification is modified in the PeopleSoft system as needed.

The **Human Resources Department ("HR")** will ensure that employee records are promptly updated within PeopleSoft. The HR Department will also issue the FERC Employee Changes Report ("Report")¹.

The **Chief Compliance Officer ("CCO")** will coordinate the transfer of each employee to include the review of physical and electronic user access with the appropriate support areas and Transmission Management as well as address other compliance matters as required.

The **Transferring Employee** will maintain the confidentiality of Non-Public Transmission Information ("NPTI") acquired during their tenure in their previous position. The transferring employee will not take or utilize NPTI (paper or electronic) and under no circumstances may the transferring employee be a conduit of NPTI.

III. Notification

The TM and MM for the transferring employee will notify the CCO as soon as the transfer is anticipated. The proposed effective date will be a minimum of five (5) business days after notification to the CCO.

IV. Security Review

- a. For IST Managed Systems, the CCO will contact IST's Security Admins to coordinate the de-provisioning of the transferring employees account on the effective date of the transfer.

¹ The Report indicates any changes to an employee's data in HR (job title, chain of command, department, FERC Classification, etc).

- b. For Transmission Owned and Managed Systems, if the employee is transferring from a Transmission Provider, the CCO will coordinate with the TCA and TM to ensure electronic access is removed by the effective date of the transfer.
- c. For physical security, the CCO will contact Corporate Security and coordinate the de-provisioning of the transferring employee's badge on the effective date of the transfer.

V. Training

The CCO will determine the need for additional training for the transferring employee and acquiring/releasing managers.

VI. Posting

- a. The TCA will ensure that the "Employee Transfers" posting on the Internet Website is updated within seven (7) business days from the effective date of an applicable transfer.
- b. The posting will included:
 - i. The name of the transferring employee.
 - ii. The respective titles held while performing each function, as a Transmission Function Employee and as a Marketing Function Employee.
 - iii. The effective date of the transfer.
- c. The Generalist will promptly provide the TCA with any information that is necessary to complete the required posting.

VII. Documentation

The below documentation shall be retained for a period of no less than five (5) years:

- The TCA will maintain documentation to support updates to postings.
- The CCO will maintain documentation to support the security review process.

Revision History

Version	Date	Performed By:	Description
1.0	01/13/13	Kevin Painter	Reformatting of procedure and inclusion of versioning.
2.0	02/01/15	Kevin Painter	Removal of CGT references and other minor changes.
3.0	05/06/19	Kevin Painter	Updated to reflect name changes and other administrative edits.

**Appendix G
to
DESC Standards of Conduct
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**Communications
Between
Transmission Function Employees and Marketing Function Employees**

I. Procedure Overview

Sections 358.2(a), 358.2(d), 358.7(b) and 358.7(h) of the Federal Energy Regulatory Commission's ("FERC") regulations require Dominion Energy South Carolina ("DESC") limit communications between Marketing Function Employees ("MFEs") and Transmission Function Employees ("TFEs") to certain permissible topics. In addition, DESC must maintain records of any such communications.

II. Responsibilities

Transmission Function Employees ("TFEs") and Marketing Function Employees ("MFEs") will ensure communication topics and use of associated recordation tools are approved by the CCO prior to communications occurring.

The **Chief Compliance Officer ("CCO")** will approve communication topics and associated utilization of recordation tools.

Any **DESC Employee ("Employee")** who plans, organizes, or assists the organization of a meeting involving a TFE and MFE shall follow the Joint Meeting Procedure

The **Transmission Management ("TM")** and **Marketing Management ("MM")** shall be responsible for notifying the TCA of any shared email boxes¹ utilized by their respective groups. Transmission Management shall also be responsible for communicating any changes occurring to any phones utilized for voice recordation.

The **Transmission Compliance Administrator ("TCA")** shall be responsible for maintaining security groups utilized in email capture.

Telecommunications and Information Services and Technology ("IST") will work in cooperation with the CCO to ensure all applicable phones are recorded and that all applicable recordings meet retention requirements. In addition, IST will work in cooperation with the CCO to ensure the email capture process is functioning and emails identified meet retention requirements.

The **Human Resources Department ("HR")** shall ensure that employee records are promptly added or updated within PeopleSoft. HR shall issue the FERC Employee Changes Report ("Report")²

III. Public Release

From time to time, DESC may need to disclose non-public transmission information (NPTI) to facilitate discussions with government agencies, councils and the general public. In these instances, the transmission information must be posted on the Internet Website prior to the release of such information.

¹ Shared email boxes are email boxes that are not associated with an individual's network account. This does not include distribution list.

² The Report indicates any changes to an employee's data in HR (job title, chain of command, department, FERC Classification, etc).

IV. Communications Approval

Communications between MFEs and TFEs must be approved by the CCO prior to communications occurring. The CCO maintains a list of preapproved communication topics and the appropriate recordation tools (Attachment 1).

V. Recordation Tools

Employee use of these tools shall be approved by the CCO as outlined in Section IV.

a. Email

- i. Communication through Dominion Energy's Microsoft Outlook. Server based rules within Microsoft Exchange are used to identify and capture emails between MFEs and TFEs. These rules rely on the following Security Access Request ("SAR") roles:
 - "EXC SOC Elec Trans Users" (all TFEs)
 - "EXC SOC MFE Users" (all MFEs)
- ii. Captured emails are placed in the "FERC SOC" mailbox and are monitored by the CCO.
- i. The TCA shall monitor the Report for any changes that impact the email groups. Contemporaneous upon receiving notice, the TCA shall request changes by utilizing IST's SAR system.
- ii. The TCA shall perform semi-annual reviews with Transmission Management to ensure all shared mailboxes are identified and captured (i.e. Reliability Desk, Balance and Interchange Desk)

b. Recorded Phone – Communication utilizing Dominion Energy's phone network and Virent and Witness voice recording software.

- i. The CCO maintains a list of "Approved Phones" for use in voice communications (see Attachment 1).
- ii. Transmission Management shall notify the CCO when changes are made that affect Approved Phones.

c. Joint Meeting Procedure – In-person or conference call meetings where the CCO monitors and maintains meeting notes.

- i. Before the meeting may occur, the meeting requester must provide the CCO the following information within a reasonable time period prior to the requested meeting date:
 1. Purpose and/or agenda for the meeting
 2. List of attendees
 3. Meeting logistics (date, time, location)
 4. Any material to be distributed
- ii. The CCO will be responsible for approving or denying such meeting request.
- iii. If approved, the CCO will be responsible for arranging the meeting request.
- iv. The CCO, or designee, is responsible for attending the meeting and maintaining an auditable record of the list of attendees, minutes regarding the subject matter discussed handouts and any other supporting documentation. Only agenda topics will be discussed during the meeting.

VI. Documentation

The below documentation shall be retained for a period of no less than five (5) years:

- TCA will maintain documentation to support any updates to SAR Roles.
- TCA will maintain documentation to support semi-annual reviews of shared mailboxes.
- The CCO will maintain the documentation to support Joint Meetings for a period of five (5) years.

Revision History

Version	Date	Performed By:	Description
1.0	01/13/13	Kevin Painter	Reformatting of procedure and inclusion of versioning.
2.0	02/01/15	Kevin Painter	Removed references to CGT. Merged with Joint Meeting procedure. Other minor updates.
3.0	05/07/19	Kevin Painter	Updated to reflect name changes and other administrative edits.

**Attachment 1
of
Appendix G**

**Approved Communications
Between
Marketing Function and Transmission Function Employees**

I. Purpose

This document provides communication topics and methods which have been approved by the CCO. Any communication topics not defined below must be approved by the CCO (as outlined in Appendix G, IV).

II. General Interactions

- a. The CCO has approved the following general interactions between Transmission Function Employees (“TFEs”) and Marketing Function Employees (“MFEs”):
 - Social Events
 - Dominion Energy Charitable Events (*i.e.* United Way, Walk for Life)
- b. These interactions do not require any form of recordation with the exception that ANY communication on Dominion Energy South Carolina phones – be it a business communication or a social communication – must occur on approved recorded lines (listed below).
- c. **The No-Conduit Rule must be followed at all times.**

III. DESC Business Interactions

The CCO has pre-approved the following email and phone interactions between DESC’s TFEs and MFEs:

Group	Approved Topic	Email	Phone	Approved Phone
Electric System Control	Discussing day-to-day activities such as generation dispatch, load forecast, unit commitment, reliability, purchasing needs, generation for sale	Approved	Approved	32570; 72099; 32571 (JIC Only); 71991 (JIC Only)
Operations Planning	Discussing day-to-day activities such as supply availability, meter check outs	Approved	Approved	72046
Electric Computer Support	Discuss problems and issues associated with use of EMS	Approved	Approved	32512

Revision History

Version	Date	Performed By:	Description
1.0	01/13/13	Kevin Painter	Reformatting of procedure and inclusion of versioning.
2.0	02/01/15	Kevin Painter	Removed references to CGT and other minor changes
2.1	03/27/15	Mary C. Salane-Walker	Addition of JIC only approved phone.
3.0	05/07/19	Kevin Painter	Updated to reflect name changes and other administrative edits.

Appendix H
to
DESC Standards of Conduct
Implementing Procedures

Information Disclosure

I. Procedure Overview

Sections 358.7(a) of the Federal Energy Regulatory Commission's ("FERC") regulations requires Dominion Energy South Carolina ("DESC") immediately post on its Internet Website any Non-Public Transmission Information ("NPTI") that was improperly disclosed to a Marketing Function Employee ("MFE"). If the disclosure is of non-public customer information, or critical energy infrastructure information ("CEII"), only a notice of the disclosure occurrence will be posted.

The following procedure will apply in the event a DESC employee improperly discloses NPTI to a MFE.

II. Responsibilities

Any **DESC Employee ("Employee")** that becomes aware of any potential prohibited disclosure will immediately notify the Chief Compliance Officer either directly or through their management chain.

The **Chief Compliance Officer ("CCO")** will review any potential prohibited disclosure and coordinate with the Transmission Compliance Administrator to make any necessary postings.

The **Transmission Compliance Administrator ("TCA")** will make any posting to DESC's Internet Website that the CCO deems necessary as a result of a prohibited disclosure.

III. Notification

- a. Any employee, who becomes aware of a potential prohibited disclosure, including the employee making such potential prohibited disclosure, will immediately notify the CCO either directly or through their management chain. The notification must contain the following information:
 - i. The name of the employee who disclosed the information.
 - ii. The date and time the information was disclosed.
 - iii. The method of disclosure (whether verbally, electronically or by paper copy).
 - iv. The MFE to whom the information was disclosed.
 - v. The specifics of the information disclosed to the MFE.
- b. In the event the potential disclosure occurred electronically, providing the CCO with a copy of the electronic media will satisfy the notification requirements in Section III, a, i-v.

IV. Review and Posting

- a. Once notified, the CCO will determine whether a prohibited disclosure occurred.
- b. If a prohibited disclosure has occurred:
 - i. The CCO will work in conjunction with appropriate employees to draft the required disclosure posting.
 1. If the information disclosed does not contain customer information or CEII, the posting will contain the following:
 - a. The date and time of the disclosure.
 - b. To whom the disclosure was made.
 - c. The information disclosed.
 2. If the information disclosed does contain customer information or CEII, the posting will contain the following:
 - a. The date and time of the disclosure.
 - b. To whom the disclosure was made.
 - c. A general description of the type of information disclosed.

- ii. The CCO will provide to the TCA the drafted posting.
- iii. The TCA will immediately post on the Internet Website, under “Standards of Conduct” “Information Disclosure”.
- iv. The posting will remain on the Internet Website indefinitely.

V. Documentation

The below documentation shall be retained for a period of no less than five (5) years:

- The TCA will maintain documentation to support any required postings.
- The CCO will maintain documentation to support any notification and review of potential prohibited disclosures

Revision History

Version	Date	Performed By:	Description
1.0	01/13/13	Kevin Painter	Reformatting of procedure and inclusion of versioning.
2.0	02/01/15	Kevin Painter	Removal of references to CGT. Other minor edits.
3.0	05/06/19	Kevin Painter	Updated to reflect name changes and other administrative edits.

Appendix I
to
DESC Standards of Conduct
Implementing Procedures

Emergency Situations

I. Procedure Overview

The Federal Energy Regulation Commission's regulations, ("FERC") under 18.C.F.R. Part 358.7(g)(2), ("Standards of Conduct" or "Standards") state that in the event of an emergency, such as an earthquake, flood, fire or hurricane, severely disrupts normal business operations, Dominion Energy South Carolina ("DESC") may suspend postings as required in 18.C.F.R. Part 358.7. If the disruption lasts longer than one (1) month, DESC must notify the FERC and seek a further exemption from the posting requirements.

II. Responsibilities

The **Transmission Management (TM)** shall contact the **Chief Compliance Officer ("CCO")** as soon practical after declaring an unanticipated emergency. If the emergency is anticipated, TM shall contact the CCO before declaring an emergency and provide information regarding the potential emergency situation.

If emergency conditions exist, the CCO will determine appropriate recordation methods for communications between Transmission and Marketing Function employees. If emergency conditions persist longer than one (1) month, the CCO shall contact the FERC and determine whether to seek a further exemption of posting requirements.

III. Documentation

The below documentation shall be retained for a period of no less than five (5) years:

- TM shall maintain documentation to support any emergency situation that resulted in a suspension of the Standards posting requirements.
- The CCO shall maintain documentation to support any notification to FERC as a result of an emergency lasting over one (1) month.

Revision History

Version	Date	Performed By:	Description
1.0	01/13/13	Kevin Painter	Reformatting of procedure and inclusion of versioning.
2.0	02/01/15	Kevin Painter	Removal of references to CGT.
3.0	05/06/19	Kevin Painter	Updated to reflect name changes and other administrative edits.

**Appendix J
to
DESC Standards of Conduct
Implementing Procedures**

Voluntary Consent

I. Procedure Overview

In compliance with Sections 358.7(c) of the Federal Energy Regulatory Commission's ("FERC") regulations, a transmission customer may Voluntarily Consent, in writing, to allow Dominion Energy South Carolina ("DESC") to release its information to a Marketing Function Employee ("MFE").

DESC must obtain a customer's Voluntary Consent prior to disclosing any of its information to a MFE and post notice of such consent on its Internet Website within seven (7) business days.

II. Responsibilities

The **Manager of Electric Transmission Support ("Manager")** will obtain a customer's Voluntary Consent prior to DESC disclosing its information to a MFE.

The **Transmission Compliance Administrator ("TCA")** will ensure notice of Voluntary Consent is posted on the Internet Website within seven (7) business days.

III. Execution and Notification

The Manager will be responsible for obtaining a customer's Voluntary Consent by executing a Voluntary Consent Form (see Attachment 1). Once executed, the Manager will contemporaneously provide the executed form to the TCA. In addition, the Manager will notify applicable Transmission Management that the Voluntary Consent has been obtained.

IV. Posting

The TCA will be responsible for posting notice of the Voluntary Consent on DESC's Internet Website within seven (7) business days of receipt. The posting will contain the following information:

- Legal name of customer;
- Statement that DESC did not provide any preferences, either operational or rate related in exchange for the consent.

V. Withdrawal

Voluntary Consent shall remain effective and posted until a customer requests withdrawal. The Manager will notify Transmission Management of such withdrawal. The TCA shall remove the associated posting within seven (7) business days of notification.

VI. Documentation

The below documentation shall be retained for a period of no less than five (5) years:

- The TCA will maintain documentation to support obtainment of the customers' Voluntary Consent and posting notice of such consent.
- The Manager will maintain customers' executed Voluntary Consent forms.

Revision History

Version	Date	Performed By:	Description
1.0	01/13/13	Kevin Painter	Reformatting of procedure and inclusion of versioning.
2.0	02/01/15	Kevin Painter	Updated ETCA to TCA.
3.0	05/06/19	Kevin Painter	Updated to reflect name changes and other administrative edits.



For Details, Contact:
Jay Cole
jay.cole@dominionenergy.com
Phone (803) 217-1998

Voluntary Customer Consent

Transmission Customer Information Voluntary Release Consent Agreement

_____ (“Customer”)
voluntarily authorizes Dominion Energy South Carolina (“DESC”) (“Transmission Provider”) to
release its customer information to: _____
 (“A Marketing Affiliate”).

Customer hereby acknowledges that DESC did not offer nor provide any preferences, either
operational or rate-related, in exchange for this voluntary consent.

Customer Name: _____
Title: _____
Signature: _____
Date: _____

**Appendix K
to
DESC Standards of Conduct
Implementing Procedures**

Affiliate Tariff Waivers

I. Procedure Overview

In compliance with Sections 358.7(i) of the Federal Energy Regulatory Commission's ("FERC") regulations, Dominion Energy South Carolina ("DESC") will post on its Internet Website the notice of each waiver of a Tariff provision that is granted in favor of an Affiliate. The posting will be made within one (1) business day of the act of waiver. DESC will also maintain a written log detailing the circumstances and manner of any such waiver.

II. Responsibilities

The **Requesting Employee** will obtain necessary approval prior to granting a waiver in favor of an Affiliate and for providing the **Transmission Compliance Administrator ("TCA")** documentation to support any such waiver.

The **VP of Electric Transmission ("VP")** and **Chief Compliance Officer ("CCO")** will approve waivers in favor of an Affiliate prior to such waivers being granted.

The TCA shall ensure approved waivers are posted within one (1) business day of the waiver being approved and it shall remain posted for five (5) years. The TCA shall also maintain a log of such waivers for a period of five (5) years.

III. Waiver Review and Approval

- a. Prior to granting a waiver, the Requesting Employee shall circulate the information in Section IV.b.i-v to the following departments for commercial and legal review:
 - VP of Electric Transmission
 - Manager of System Control Center
 - Manager of Transmission Planning
 - Manager of Operations Planning
 - Manager of Electric Transmission Support
 - CCO
- b. The VP must provide final commercial approval.
- c. The CCO must provide final legal approval.
- d. If approved, the Requesting Employee shall provide documentation to support the waiver to the TCA contemporaneously.

IV. Log

- a. The TCA shall be responsible for maintaining a log of applicable waivers.
- b. The log will contain the following information, as applicable:
 - i. The name of the affiliate requesting the waiver.
 - ii. The date the waiver was requested.
 - iii. Identification of the specific Tariff provision for which the affiliate is requesting a waiver.
 - iv. Term of the waiver.
 - v. How the Tariff provision was waived.
 - vi. Who approved the waiver.
 - vii. Date the waiver was approved.

V. Posting

The TCA shall be responsible for posting notice of applicable waivers on DESC's Internet Website within one (1) business day of the waiver being granted. The posting will contain the information provided in Section IV.b.

VI. Documentation

- The TCA shall maintain documentation to support the waiver log and posting.
- Documentation should be indexed and readily accessible for a period of five (5) years.

Revision History

Version	Date	Performed By:	Description
1.0	1/13/13	Kevin Painter	Reformatting of procedure and inclusion of versioning.
2.0	02/01/15	Kevin Painter	Updated ETCA to TCA. Other Minor changes
3.0	05/06/19	Kevin Painter	Updated to reflect name changes and other administrative edits.

Appendix L
to
DESC Standards of Conduct
Implementing Procedures

Chief Compliance Officer

I. Procedure Overview

Dominion Energy South Carolina (“DESC”) is required by the Federal Energy Regulation Commission, (“FERC”) under 18.C.F.R. Part 358.8(c)(2), (“Standards of Conduct” or “Standards”) to designate a Chief Compliance Officer (“CCO”) who will be responsible for Standards compliance. In addition, the name and contact information for the CCO will be posted on DESC’s Internet Website.

II. Responsibilities

The **Chief Compliance Officer (“CCO”)** will ensure that the required posting remains accurate and any change is updated within seven (7) business days of the change and that the documentation necessary to support such change is retained.

The **Transmission Compliance Administrator (“TCA”)** will be responsible for posting and updating the “Chief Compliance Officer” posting as directed by the CCO.

III. Posting

- a. The CCO will ensure the posting contains the CCO’s name and contact information.
- b. The CCO will provide the TCA with any applicable updates within three (3) business days of a change.
- c. The TCA will post any updates provided by the CCO within four (4) business days on the Internet Website under the “Standards of Conduct”, “Chief Compliance Officer”.

IV. Documentation

The below documentation shall be retained for a period of no less than five (5) years:

- The CCO will maintain documentation to support any updates to the required postings.
- The TCA will maintain documentation to support the performance of the posting.

Revision History

Version	Date	Performed By:	Description
1.0	01/13/13	Kevin Painter	Reformatting of procedure and inclusion of versioning.
2.0	02/01/15	Kevin Painter	Removed references to CGT.
3.0	05/06/19	Kevin Painter	Updated to reflect name changes and other administrative edits.

**Appendix M
to
DESC Standards of Conduct
Implementing Procedures**

Affiliate Names and Addresses

I. Procedure Overview

Dominion Energy South Carolina (“DESC”) is required by the Federal Energy Regulation Commission, (“FERC”) under 18.C.F.R. Part 358.7(e), (“Standards of Conduct” or “Standards”) to post on its Internet Website the names and addresses of all Affiliates that employ or retain Marketing Function Employees (“MFEs”).

II. Responsibilities

The **Chief Compliance Officer (“CCO”)** will ensure that the list of Affiliates remains accurate and any change is updated within seven (7) business days of the change.

The **Transmission Compliance Administrator (“TCA”)** will be responsible for posting and updating the Affiliates’ Names and Addresses as directed by the CCO.

III. Identification

- a. The CCO will be knowledgeable of the job responsibilities of DESC’s Affiliates to ensure those who employ or retain MFEs are appropriately identified for posting.
- b. The CCO will be knowledgeable of any changes to the names and addresses of identified Marketing Affiliates.

IV. Posting

- a. The CCO will provide the TCA with any applicable updates within three (3) business days of the change.
- b. The TCA will post any updates provided by the CCO within four (4) business days on the Internet Website under the “Standards of Conduct”, “Affiliate Names & Addresses”.

V. Documentation

The below documentation shall be retained for a period of no less than five (5) years:

- The CCO will maintain documentation to support any updates to the required postings.
- The TCA will maintain documentation to support the performance of the posting.

Revision History

Version	Date	Performed By:	Description
1.0	01/13/13	Kevin Painter	Reformatting of procedure and inclusion of versioning.
2.0	02/01/15	Kevin Painter	Removed references to CGT. Other minor updates.
3.0	05/06/19	Kevin Painter	Updated to reflect name changes and other administrative edits.

**Appendix N
to
DESC Standards of Conduct
Implementing Procedures**

Shared Facilities

I. Procedure Overview

Dominion Energy South Carolina (“DESC”) is required by the Federal Energy Regulation Commission, (“FERC”) under 18.C.F.R. Part 358.7(e), (“Standards of Conduct” or “Standards”) to post on its Internet Website a complete list of the employee-staffed facilities shared by Transmission Function Employees (TFEs) and Marketing Function Employees (“MFEs”). The list must include types of facilities shared and the addresses of the facilities.

II. Responsibilities

The **Chief Compliance Officer (“CCO”)** will ensure that the list of facilities shared by TFEs and MFEs remains accurate and any change is updated within seven (7) business days of the change and that the documentation necessary to support such change is retained.

The **Transmission Compliance Administrator (“TCA”)** will post and update the “Shared Facilities” posting on DESC’s Internet Website as directed by the CCO.

III. Identification

The CCO will be knowledgeable of the facilities utilized by TFEs and MFEs to ensure shared facilities are appropriately identified in the posting.

IV. Posting

- a. The CCO will provide the TCA with any applicable updates within three (3) business days of the change.
- b. The TCA will post any updates provided by the CCO within four (4) business days on the Internet Website under the “Standards of Conduct”, “Shared Facilities”.

V. Documentation

The below documentation shall be retained for a period of no less than five (5) years:

- The CCO will maintain documentation to support any updates to the required postings.
- The TCA will maintain documentation to support the performance of the posting.

Revision History

Version	Date	Performed By:	Description
1.0	01/13/13	Kevin Painter	Reformatting of procedure and inclusion of versioning.
2.0	02/01/15	Kevin Painter	Removal of references to CGT. Other minor changes.
3.0	05/06/19	Kevin Painter	Updated to reflect name changes and other administrative edits.

Appendix O
to
DESC Standards of Conduct
Implementing Procedures

Potential Merger

I. Procedure Overview

Dominion Energy South Carolina (“DESC”) is required by the Federal Energy Regulation Commission, (“FERC”) under 18.C.F.R. Part 358.7(e)(3), (“Standards of Conduct” or “Standards”) to post on its Internet Website information concerning potential merger partners as Affiliates that may employ or retain Marketing Function Employees (“MFEs”) within seven (7) business days of the merger announcement.

II. Responsibilities

The **DESC Public Affairs Department (“Public Affairs”)** will notify the Chief Compliance Officer of a proposed merger at least one (1) business day prior to the merger being publicly announced.

The **Chief Compliance Officer (“CCO”)** will review the proposed merger to determine if the potential merging partner does or will employ or retain Marketing Function Employees. The CCO will be responsible for providing the **Transmission Compliance Administrator (“TCA”)** with any posting necessary as a result of a proposed merger.

The TCA will post and update the “Potential Merger” posting on DESC’s Internet Website as directed by the CCO.

III. Notification and Review

- a. Public Affairs will provide the CCO with information concerning a proposed merger at least one (1) business day prior to the merger being publically announced. The information provided will be sufficient enough for the CCO to conduct a review.
- b. Upon being notified, the CCO will review the proposed merger and will determine if a posting is necessary.

IV. Posting

- a. If necessary, the CCO will provide the TCA with a posting concerning a proposed merger within three (3) business days of the merger’s public announcement.
- b. The TCA will post the information within four (4) business days on the Internet Website under the “Standards of Conduct”, “Potential Merger”.

V. Documentation

The below documentation shall be retained for a period of no less than five (5) years:

- The TCA will maintain documentation to support the performance of the posting.

Revision History

Version	Date	Performed By:	Description
1.0	01/13/13	Kevin Painter	Reformatting of procedure and inclusion of versioning.
2.0	02/01/15	Kevin Painter	Removed references to CGT. Other minor changes.
3.0	05/06/19	Kevin Painter	Updated to reflect name changes and other administrative edits.

**Appendix P
to
DESC Standards of Conduct
Implementing Procedures**

Books and Records

I. Procedure Overview

Dominion Energy South Carolina (“DESC”) is required by the Federal Energy Regulatory Commission (“FERC”) under 18 C.F.R. Part 358.8(d) (“Standards of Conduct” or “Standards”) to maintain the books of accounts and records (as prescribed under 18 C.F.R. Parts 101, 125, 201, and 225) separately from those of its affiliates that employ or retain Marketing Function Employees (“MFEs”) and make these available for the Commission inspection.

II. Responsibilities

The **DESC Controller (“Controller”)** will ensure all books and records are maintained in accordance with all applicable regulations and standards, conform to generally accepted accounting principles, company policies, procedures and system of internal controls and accurately reflect the true nature of the transaction they record. The Controller will ensure all books and records comply with applicable record retention regulations, and company policies and procedures. The Controller will maintain documentation necessary to support compliance with the FERC rules and regulations.

Revision History

Version	Date	Performed By:	Description
1.0	01/13/13	Kevin Painter	Reformatting of procedure and inclusion of versioning.
2.0	02/01/15	Kevin Painter	Removed references to CGT.
3.0	05/06/19	Kevin Painter	Updated to reflect name changes and other administrative edits.

Appendix Q
To
DESC Standards of Conduct
Implementing Procedures

The FERC's Standard of Conduct Regulations

Title 18 Code of Federal Regulations

§ 358.1 Applicability.

- (a) This part applies to any interstate natural gas pipeline that transports gas for others pursuant to subparts B or G of part 284 of this chapter and conducts transmission transactions with an affiliate that engages in marketing functions.
- (b) This part applies to any public utility that owns, operates, or controls facilities used for the transmission of electric energy in interstate commerce and conducts transmission transactions with an affiliate that engages in marketing functions.
- (c) This part does not apply to a public utility transmission provider that is a Commission-approved Independent System Operator (ISO) or Regional Transmission Organization (RTO). If a public utility transmission owner participates in a Commission-approved ISO or RTO and does not operate or control its transmission system and has no access to transmission function information, it may request a waiver from this part.
- (d) A transmission provider may file a request for a waiver from all or some of the requirements of this part for good cause.

§ 358.2 General principles.

- (a) As more fully described and implemented in subsequent sections of this part, a transmission provider must treat all transmission customers, affiliated and non-affiliated, on a not unduly discriminatory basis, and must not make or grant any undue preference or advantage to any person or subject any person to any undue prejudice or disadvantage with respect to any transportation of natural gas or transmission of electric energy in interstate commerce, or with respect to the wholesale sale of natural gas or of electric energy in interstate commerce.
- (b) As more fully described and implemented in subsequent sections of this part, a transmission provider's transmission function employees must function independently from its marketing function employees, except as permitted in this part or otherwise permitted by Commission order.
- (c) As more fully described and implemented in subsequent sections of this part, a transmission provider and its employees, contractors, consultants and agents are prohibited from disclosing, or using a conduit to disclose, non-public transmission function information to the transmission provider's marketing function employees.
- (d) As more fully described and implemented in subsequent sections of this part, a transmission provider must provide equal access to non-public transmission function information disclosed to marketing function employees to all its transmission customers, affiliated and non-affiliated, except as permitted in this part or otherwise permitted by Commission order.

[74 FR 54482, Oct. 22, 2009]

§ 358.3 Definitions.

(a) *Affiliate* of a specified entity means:

- (1) Another person that controls, is controlled by or is under common control with, the specified entity. An affiliate includes a division of the specified entity that operates as a functional unit.
- (2) For any exempt wholesale generator (as defined under §366.1 of this chapter), affiliate shall have the meaning set forth in §366.1 of this chapter, or any successor provision.

Current as of 2/1/15

(3) "Control" as used in this definition means the direct or indirect authority, whether acting alone or in conjunction with others, to direct or cause to direct the management policies of an entity. A voting interest of 10 percent or more creates a rebuttable presumption of control.

(b) *Internet Web site* refers to the Internet location where an interstate natural gas pipeline or a public utility posts the information, by electronic means, required under this part 358.

(c) *Marketing functions means:*

(1) in the case of public utilities and their affiliates, 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; and

(2) in the case of interstate pipelines and their affiliates, the sale for resale in interstate commerce, or the submission of offers to sell in interstate commerce, natural gas, subject to the following exclusions:

(i) Bundled retail sales,

(ii) Incidental purchases or sales of natural gas to operate interstate natural gas pipeline transmission facilities,

(iii) Sales of natural gas solely from a seller's own production,

(iv) Sales of natural gas solely from a seller's own gathering or processing facilities, and

(v) On-system sales by an intrastate natural gas pipeline, by a Hinshaw interstate pipeline exempt from the Natural Gas Act, by a local distribution company, or by a local distribution company operating under section 7(f) of the Natural Gas Act.

(d) *Marketing function employee* means an employee, contractor, consultant or agent of a transmission provider or of an affiliate of a transmission provider who actively and personally engages on a day-to-day basis in marketing functions.

(e) *Open Access Same Time Information System or OASIS* refers to the Internet location where a public utility posts the information required by part 37 of this chapter, and where it may also post the information required to be posted on its Internet Web site by this part 358.

(f) *Transmission* means electric transmission, network or point-to-point service, ancillary services or other methods of electric transmission, or the interconnection with jurisdictional transmission facilities, under part 35 of this chapter; and natural gas transportation, storage, exchange, backhaul, or displacement service provided pursuant to subparts B or G of part 284 of this chapter.

(g) *Transmission customer* means any eligible customer, shipper or designated agent that can or does execute a transmission service agreement or can or does receive transmission service, including all persons who have pending requests for transmission service or for information regarding transmission.

(h) *Transmission functions* means the planning, directing, organizing or carrying out of day-to-day transmission operations, including the granting and denying of transmission service requests.

(i) *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.

(j) *Transmission function information* means information relating to transmission functions.

(k) *Transmission provider* means:

(1) Any public utility that owns, operates or controls facilities used for the transmission of electric energy in interstate commerce; or

(2) Any interstate natural gas pipeline that transports gas for others pursuant to subparts B or G of part 284 of this chapter.

(3) A transmission provider does not include a natural gas storage provider authorized to charge market-based rates.

Current as of 2/1/15

(l) *Transmission service* means the provision of any transmission as defined in §358.3(f).

(m) *Waiver* means the determination by a transmission provider, if authorized by its tariff, to waive any provisions of its tariff for a given entity.

[73 FR 63829, Oct. 27, 2008, as amended at 74 FR 54482, Oct. 22, 2009]

§ 358.4 Non-discrimination requirements.

(a) A transmission provider must strictly enforce all tariff provisions relating to the sale or purchase of open access transmission service, if the tariff provisions do not permit the use of discretion.

(b) A transmission provider must apply all tariff provisions relating to the sale or purchase of open access transmission service in a fair and impartial manner that treats all transmission customers in a not unduly discriminatory manner, if the tariff provisions permit the use of discretion.

(c) A transmission provider may not, through its tariffs or otherwise, give undue preference to any person in matters relating to the sale or purchase of transmission service (including, but not limited to, issues of price, curtailments, scheduling, priority, ancillary services, or balancing).

(d) A transmission provider must process all similar requests for transmission in the same manner and within the same period of time.

§ 358.5 Independent functioning rule.

(a) *General rule.* Except as permitted in this part or otherwise permitted by Commission order, a transmission provider's transmission function employees must function independently of its marketing function employees.

(b) *Separation of functions.* (1) A transmission provider is prohibited from permitting its marketing function employees to:

(i) Conduct transmission functions; or

(ii) Have access to the system control center or similar facilities used for transmission operations that differs in any way from the access available to other transmission customers.

(2) A transmission provider is prohibited from permitting its transmission function employees to conduct marketing functions.

§ 358.6 No conduit rule.

(a) A transmission provider is prohibited from using anyone as a conduit for the disclosure of non-public transmission function information to its marketing function employees.

(b) An employee, contractor, consultant or agent of a transmission provider, and an employee, contractor, consultant or agent of an affiliate of a transmission provider that is engaged in marketing functions, is prohibited from disclosing non-public transmission function information to any of the transmission provider's marketing function employees.

§ 358.7 Transparency rule.

(a) *Contemporaneous disclosure.* (1) If a transmission provider discloses non-public transmission function information, other than information identified in paragraph (a)(2) of this section, in a manner contrary to the requirements of §358.6, the transmission provider must immediately post the information that was disclosed on its Internet Web site.

(2) If a transmission provider discloses, in a manner contrary to the requirements of §358.6, non-public transmission customer information, critical energy infrastructure information (CEII) as defined in §388.113(c)(1) of this chapter or any successor provision, or any other information that the Commission by law has determined is to be subject to limited dissemination, the transmission provider must immediately post notice on its Web site that the information was disclosed.

Current as of 2/1/15

(b) *Exclusion for specific transaction information.* A transmission provider's transmission function employee may discuss with its marketing function employee a specific request for transmission service submitted by the marketing function employee. The transmission provider is not required to contemporaneously disclose information otherwise covered by §358.6 if the information relates solely to a marketing function employee's specific request for transmission service.

(c) *Voluntary consent provision.* A transmission customer may voluntarily consent, in writing, to allow the transmission provider to disclose the transmission customer's non-public information to the transmission provider's marketing function employees. If the transmission customer authorizes the transmission provider to disclose its information to marketing function employees, the transmission provider must post notice on its Internet Web site of that consent along with a statement that it did not provide any preferences, either operational or rate-related, in exchange for that voluntary consent.

(d) *Posting written procedures on the public Internet.* A transmission provider must post on its Internet Web site current written procedures implementing the standards of conduct.

(e) *Identification of affiliate information on the public Internet.* (1) A transmission provider must post on its Internet Web site the names and addresses of all its affiliates that employ or retain marketing function employees.

(2) A transmission provider must post on its Internet Web site a complete list of the employee-staffed facilities shared by any of the transmission provider's transmission function employees and marketing function employees. The list must include the types of facilities shared and the addresses of the facilities.

(3) The transmission provider must post information concerning potential merger partners as affiliates that may employ or retain marketing function employees, within seven days after the potential merger is announced.

(f) *Identification of employee information on the public Internet.* (1) A transmission provider must post on its Internet Web site the job titles and job descriptions of its transmission function employees.

(2) A transmission provider must post a notice on its Internet Web site of any transfer of a transmission function employee to a position as a marketing function employee, or any transfer of a marketing function employee to a position as a transmission function employee. The information posted under this section must remain on its Internet Web site for 90 days. No such job transfer may be used as a means to circumvent any provision of this part. The information to be posted must include:

(i) The name of the transferring employee,

(ii) The respective titles held while performing each function (*i.e.*, as a transmission function employee and as a marketing function employee), and

(iii) The effective date of the transfer.

(g) *Timing and general requirements of postings on the public Internet.* (1) A transmission provider must update on its Internet Web site the information required by this part 358 within seven business days of any change, and post the date on which the information was updated. A public utility may also post the information required to be posted under part 358 on its OASIS, but is not required to do so.

(2) In the event an emergency, such as an earthquake, flood, fire or hurricane, severely disrupts a transmission provider's normal business operations, the posting requirements in this part may be suspended by the transmission provider. If the disruption lasts longer than one month, the transmission provider must so notify the Commission and may seek a further exemption from the posting requirements.

(3) All Internet Web site postings required by this part must be sufficiently prominent as to be readily accessible.

(h) *Exclusion for and recordation of certain information exchanges.* (1) Notwithstanding the requirements of §§358.5(a) and 358.6, a transmission provider's transmission function employees and marketing function employees may exchange certain non-public transmission function information, as delineated in §358.7(h)(2), in which case the transmission provider must make and retain a contemporaneous record of all such exchanges except in emergency circumstances, in which case a record must be made of the exchange as soon as practicable after the fact. The transmission provider shall make the record available to the Commission upon request. The record may consist of hand-written or typed notes, electronic records such as e-mails and text messages, recorded telephone exchanges, and the like, and must be retained for a period of five years.

(2) The non-public information subject to the exclusion in §358.7(h)(1) is as follows:

(i) Information pertaining to compliance with Reliability Standards approved by the Commission, and

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(ii) Information necessary to maintain or restore operation of the transmission system or generating units, or that may affect the dispatch of generating units.

(i) *Posting of waivers.* A transmission provider must post on its Internet Web site notice of each waiver of a tariff provision that it grants in favor of an affiliate, unless such waiver has been approved by the Commission. The posting must be made within one business day of the act of a waiver. The transmission provider must also maintain a log of the acts of waiver, and must make it available to the Commission upon request. The records must be kept for a period of five years from the date of each act of waiver.

§ 358.8 Implementation requirements.

(a) *Effective date.* A transmission provider must be in full compliance with the standards of conduct on the date it commences transmission transactions with an affiliate that engages in marketing functions.

(b) *Compliance measures and written procedures.* (1) A transmission provider must implement measures to ensure that the requirements of §§358.5 and 358.6 are observed by its employees and by the employees of its affiliates.

(2) A transmission provider must distribute the written procedures referred to in §358.7(d) to all its transmission function employees, marketing function employees, officers, directors, supervisory employees, and any other employees likely to become privy to transmission function information.

(c) *Training and compliance personnel.* (1) A transmission provider must provide annual training on the standards of conduct to all the employees listed in paragraph (b)(2) of this section. The transmission provider must provide training on the standards of conduct to new employees in the categories listed in paragraph (b)(2) of this section, within the first 30 days of their employment. The transmission provider must require each employee who has taken the training to certify electronically or in writing that s/he has completed the training.

(2) A transmission provider must designate a chief compliance officer who will be responsible for standards of conduct compliance. The transmission provider must post the name of the chief compliance officer and provide his or her contact information on its Internet Web site.

(d) *Books and records.* A transmission provider must maintain its books of account and records (as prescribed under parts 101, 125, 201 and 225 of this chapter) separately from those of its affiliates that employ or retain marketing function employees, and these must be available for Commission inspections.