

LOS ANGELES DEPARTMENT OF WATER AND POWER

**OPEN ACCESS TRANSMISSION SERVICE
STANDARDS OF CONDUCT
IMPLEMENTATION AND
COMPLIANCE PROCEDURES**

DRAFT

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Preface. The Los Angeles Department of Water and Power (LADWP) has developed and continuously updates its Standards of Conduct Implementation and Compliance Procedures as necessary to permit LADWP to voluntarily comply with the separation of wholesale power marketing and transmission functions¹, as is currently the standard in the market participation of the electric utility business.

These Standards of Conduct assure that all LADWP's potential customers receive open access transmission service by accessing information that will enable them to obtain service on a non-discriminatory basis. LADWP's employees engaged in wholesale power marketing must not have preferential access to information about LADWP's transmission service that is not available to all users of an Open Access Same-Time Information System (OASIS). This prevents the use of inside information to gain market advantage. This also requires that personnel engaged in the transmission functions to be separate from personnel conducting wholesale power marketing functions.

LADWP is committed to reach the above objectives by conducting its business in conformity with the Standards of Conduct described below, and by providing an OASIS that is consistent with industry standards².

¹ Although LADWP is a Federal Energy Regulatory Commission (FERC) non-jurisdictional utility, these Standards of Conduct follow as model the FERC Order No. 2004 requirements, including the implementation of Standards of Conduct and the separation of wholesale power marketing and transmission functions.

² The OASIS currently in place at LADWP is consistent with the provisions of 18 C.F.R. Section 358.

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I. Introduction

The Los Angeles Department of Water and Power (LADWP) operates a multi-state generation and transmission system from its Energy Control Center (ECC), located in the metropolitan Los Angeles area. The ECC is responsible for optimizing the use of LADWP's generating resources, as well as for the reliable operation of its transmission control area. The Wholesale Merchant Function employees are responsible for the sale for resale, or purchase for resale, of electric energy in interstate commerce. The Transmission System Operations/Reliability Function employees are responsible for receiving and responding to requests for transmission service through the OASIS, determining available transmission capability (ATC) and total transmission capability (TTC), energy scheduling, transmission system operations, real-time interchange scheduling, power system planning support, and generation operations. There are additional groups (Transmission Operations & Planning, and Power Contracts) located in a different building that perform short/long-term transmission system planning, as well as developing and administering power contracts. Please refer to organizational charts and job descriptions on LADWP's OASIS (<http://www.oatioasis.com/ldwp/index.html>) for additional information.

It is the intent of LADWP to conduct its business in conformity with the Standards of Conduct described below, and to provide an OASIS that is operated in accordance with current industry standards.

II. Applicability

This code of conduct applies to all LADWP employees who engage in or possess information relative to LADWP's Wholesale Merchant and Transmission System Operations/Reliability Functions.

LADWP employees engaged in Wholesale Merchant Functions are currently in the Wholesale Marketing Section at the Energy Control Center (ECC).

LADWP employees engaged in Transmission System Operation/Reliability Functions, excepting field employees, are currently in the following LADWP departments or functions:

- . Grid Operations at the ECC;
- . Contracts Group at the John Ferraro Office Building (JFOB); and
- . Transmission Operations and Planning Group at the JFOB.

III. General Rules

- . LADWP has no affiliates of any kind engaged in Wholesale Merchant Functions or any other functions. Except as provided in paragraph III.C below, the employees of LADWP engaged in Transmission System Operations/Reliability Functions must function independently of employees engaged in Wholesale Merchant Functions.

- . LADWP will post and maintain on the OASIS an organizational chart with the names, job titles, and job description of employees (including those engaged in generation, ancillary services, and bundled retail sales), identifying those that are engaged in Transmission System Operations/Reliability Functions and those that are engaged in Wholesale Merchant Functions, and clearly showing the chain of command. See Section VI for additional information.
- A. Notwithstanding any other provisions in these Standards of Conduct, under System Emergency conditions affecting system reliability as determined by system operators based on Western Electricity Coordinating Council (WECC) and LADWP standards, LADWP may take whatever steps are necessary to keep the system in operation, including allowing for the sharing of information between the transmission function and merchant employees necessary to maintain the reliable operation of the transmission system. LADWP’s Chief Compliance Officer, or its designee, shall report on the OASIS each emergency that resulted in any deviation from these Standards of Conduct, within 24 hours of such deviation.

IV. Prohibitions

Any LADWP employee engaged in Wholesale Merchant Functions is prohibited from:

- . Conducting Transmission System Operations/Reliability Functions; and
- B. Having access to the Energy Control Center Operations Room, the Energy Management System Simulator Training Room, and other facilities used for Transmission Operations/Reliability Functions that differs in any way from access available to other open access Transmission Customers.

V. Shared Employees

- A. *Executive Management.* LADWP senior management members, in the performance of their functions have shared responsibilities in Wholesale Merchant and Transmission Operations/Reliability Functions, as reflected in the company’s organizational charts posted on its OASIS:
<http://www.oatioasis.com/ldwp/index.html>.

The Chief Operating Officer, Assistant General Managers, Directors, and Managers identified as shared functions (e.g., LADWP executives and managers who are not involved in the day-to-day duties and responsibilities, or as otherwise known as non-“operational” transmission and wholesale merchant employees), are to undergo Standards of Conduct training to assure compliance with these requirements (see Section XI for additional information). Furthermore, to the extent that these senior managers receive non-public transmission information necessary to perform their corporate and high level operational functions, they cannot and will not act as a

conduit for the exchange of such non-public transmission information with LADWP's Wholesale Merchant Functions.

- . *Risk Management Employees.* Although the Wholesale Merchant Function shares risk management employees with the Transmission Operations/Reliability Function, these employees are not operating employees of either group [ADD TO ORGANIZATIONAL CHART]. These employees serve only to assess corporate-wide risk exposure of the Department, and are not involved in directing either the Wholesale Merchant or Transmission Operations/Reliability Functions in their response to any risks identified.
- . *Lawyers.* Wholesale Merchant and Transmission Operations/Reliability Functions share City Attorney's services. These lawyers [ADD TO ORGANIZATIONAL CHART], however, are not engaged in planning, directing or organizing transmission, or wholesale energy functions; they are consulted only to provide legal or regulatory advice as mandated by the Los Angeles City Charter.
- . *Other Support Employees.* Wholesale Merchant and Transmission Operations/Reliability Functions share certain support, field and maintenance employees. With the exception of these support employees, shared employee functions are identified by business units and sub-business units in the organizational charts that are posted on LADWP's OASIS:
<http://www.oatioasis.com/ldwp/index.html>.

The categories of employees and specific functions that are shared between Wholesale Merchant and Transmission Operations/Reliability Functions include, but are not limited, to the following:

CHIEF OPERATIONAL OFFICER (COO) – Power System

- Power System Planning and Projects Director
 - o Power System Planning and Projects Assistant Director
 - Manager – Substation & Transmission Design
 - Manager – Integrated Resource Plan and Projects
 - Manager – Planning
 - Manager – Engineering
 - Energy Settlements under Wholesale Marketing
- Power System Operations and Maintenance Director
 - o Generation, Transmission and Distribution Director
 - Engineering Support
 - Steam Generation and ECC Dispatch
 - Control System and ECC Administrative Support under Grid Operations
 - Transmission O&M and Station Maintenance
 - Capital Construction and Service Shops
 - Distribution Operations and Maintenance
- Assistant General Manager – Environmental Affairs and Economic Development

- Manager – Power System Training Center
- Executive Assistant to the COO
 - o Legislative & Regulatory Affairs
- Risk Management Unit
- City Attorney’s Office
- Financial Services Organization

As a general matter and as previously noted, all trained employees understand that shared employees can receive non-public transmission information so long as they do not violate the “no-conduit rule” by passing such information along to the Wholesale Merchant Function employees.

VI. Posting Requirements

The LADWP Chief Compliance Officer shall be responsible for overseeing the timely posting and updating of each of the posting requirements shown below, in a form that is easily accessible on the LADWP OASIS website. To the extent practicable, all postings must comply with industry OASIS standards, and shall include the date of the most recent update.

- A. *Wholesale Merchant Function.* The name and address of LADWP’s Wholesale Merchant Function (ADD TO POSTING).
- B. *Shared Facilities.* A complete and current list of facilities shared by the Wholesale Merchant and Transmission Operations/Reliability Functions (See Section IX for additional information) (ADD TO POSTING).
- C. *Company Organizational Chart (s).* A comprehensive organizational chart(s) that shows the organization structure of the company with relative position of LADWP and its Wholesale Merchant Function. (ADD TO POSTING).
- D. *Employee Organizational Charts.* Comprehensive organizational charts that show the following information for all positions of employment within LADWP, except clerical, maintenance and field positions:
 - The business unit in which the employee is employed;
 - The job title and description; and
 - The chain of command.

Shared employees will be listed by function and business unit. When posting the business units, it must be clear which business units, if any, are shared with the Wholesale Merchant function. (CORRECT ORG. CHARTS, AND ADD TO POSTING LEGAL, RISK MANAGEMENT AND ACCOUNTING. CHANGE JOB DESCRIPTIONS ACCORDINGLY).

- E. *Employee Transfer.* Notice of any employee transfers between the Wholesale Merchant and Transmission Operations/Reliability Functions is posted on the

OASIS. The information to be posted must include the name of the transferring employee, the respective titles held while performing each function and effective date of transfer. The information is to be posted under this section shall remain on the OASIS for 90 days.

F. *Other Postings.* Any other postings as required in the body of this document.

To ensure that all required names and addresses, list of shared facilities and organizational charts are updated within seven days of any change, the Chief Compliance Officer communicates on a weekly basis with the Human Resources Department and Business Unit Directors to receive any updated information regarding personnel and/or organizational changes for each business unit. On a quarterly basis, the Chief Compliance Officer sends the latest employee names and organizational charts to each business unit to further ensure the accuracy of the posted information. Finally, the Chief Compliance Officer will oversee the maintenance of records of all posted organizational charts and job descriptions for a period of three years.

VII. Information Access

Any employee of LADWP engaged in Wholesale Merchant Functions:

- H. Shall have access to only that information available to LADWP's open access Transmission Customers (i.e., the information posted on the OASIS), and shall not have preferential access to any information about LADWP's transmission system that is not available to all users of the OASIS; and
- I. Is prohibited from obtaining information about LADWP's transmission system (including information about available transmission capability, price, curtailments, ancillary services, and the like) through access to information not posted on the OASIS that is not otherwise also available to the general public without restriction, or through information on the OASIS that is not also publicly available to all OASIS users.

VIII. Information Disclosure

LADWP is responsible for ensuring compliance with the following provisions:

- H. An employee of LADWP engaged in Transmission System Operations/Reliability Functions may not disclose to employees of LADWP engaged in Wholesale Merchant Functions any information concerning the transmission system of LADWP or the transmission system of another (including information received from non-affiliates or information about available transmission capability, price, curtailments, ancillary services, *etc.*) through non-public communications conducted off the OASIS that is not at the same time available to the general public without restriction, or

through information on the OASIS that is not at the same time publicly available to all OASIS users (such as E-mail).

- . If any employee of LADWP engaged in Transmission System Operations/Reliability Functions discloses information not posted on the OASIS in a manner contrary to the requirements of these Standards of Conduct, LADWP Chief Compliance Officer shall immediately post such information on the OASIS.
- . LADWP shall not share any market information acquired from non-affiliated Transmission Customers or potential non-affiliated Transmission Customers, or developed in the course of responding to requests for transmission or ancillary services on the OASIS, with its own employees engaged in Wholesale Merchant Functions, except to the limited extent information is required to be posted on the OASIS in response to a request for transmission or ancillary services.

Procedures detailing compliance with this non-disclosure requirement are discussed in the next section.

- . In the event that a customer consents in writing to the sharing of non-public Information relating to that customer, LADWP can share such information by having the Chief Compliance Officer post the customer consent letter along with a statement that it did not provide any preferences, either operational or rate-related, in exchange for that voluntary consent.
- A. LADWP's Transmission System Operations/Reliability Function employees and employees of the Wholesale Merchant Function are permitted to engage in off-OASIS communications relating to specific merchant function requests for transmission service previously submitted over the LADWP OASIS, without triggering any posting requirements.

IX. Implementation of Access Restrictions

These access restrictions are designed so that employees that perform Wholesale Merchant Functions will not have preferential access to any relevant information about LADWP's wholesale transmission system availability or costs, or uses or possible uses of LADWP's transmission system, and thus assuring that potential customers of open access transmission service receive access to information that will enable them to obtain transmission service on a non-discriminatory basis.

LADWP has physically separated Wholesale Merchant Functions employees from personnel engaged in Transmission System Operations/Reliability Functions, and has restricted these employees' access to transmission operations offices and facilities. Furthermore, LADWP has functionally separated these two groups of employees as shown on organizational charts located at the LADWP's OASIS (<http://www.oatioasis.com/ldwp/index.html>). LADWP has also limited information access to its Wholesale Merchant Functions employees by the use of passwords and

screen display restrictions on its Local Area Network (LAN), Intranet and Energy Management System (EMS) systems. Finally, all affected employees are trained and receive a copy of these Standards of Conduct to secure adherence to the Standards of Conduct during the performance of their assigned duties.

A. Facilities Access Restrictions

Wholesale Merchant Function employees and Transmission System Operations/Reliability Function employees currently share the Energy Control Center building, but they are located in separate work areas.

The Wholesale Merchant Function employees do not have physical access to those parts of the building occupied by Transmission System Operations/Reliability Function employees. Access is restricted by signs at entrances of Transmission Operations/Reliability Function rooms stating “No Wholesale Merchant Function Employees Allowed”, and by electronic access cards installed at entrances to parts of the building in the ECC occupied by Transmission System Operations/Reliability Function employees .

B. Communications Restrictions

Transmission System Operations/Reliability Function employees may not disclose to Wholesale Merchant Function employees information regarding the condition of the transmission system, operational planning for scheduled transmission outages, ATC calculations, transmission constraints, curtailments, system security, scheduled or unscheduled transmission outage records, planned transmission maintenance and construction activities, transmission schedules, real-time information about the transmission system (such as loading, capacity rating and ATC), third party loads and transmission pricing, unless already posted on the OASIS

LADWP employees have been trained as to what information is subject to the disclosure prohibitions (i.e., as noted above, information about LADWP’s transmission system and information about other transmission systems). Wholesale Merchant Function employees shall only have access to such information that is publicly available on the LADWP OASIS.

C. Information Access Restrictions

- c. *File Cabinets Security.* File cabinets with information relating to Transmission System Operations/Reliability Functions are located in different parts of the building, separate from the work areas of Wholesale Merchant Function employees, with access restricted by electronic card access, and by posted signs stating: “No Wholesale Merchant Functions Employee.
- i. *EMS System Security.* LADWP employees engaged in Wholesale Merchant Functions share an EMS with LADWP employees engaged in Transmission System Operations/Reliability Functions. Except as specifically permitted below,

the Wholesale Merchant Functions employees shall not have access to information concerning LADWP's transmission system from the EMS that is not publicly available to all OASIS users. LADWP shall implement the following measures to limit the type of information accessible on the EMS by Wholesale Merchant Functions employees:

- LADWP shall identify EMS displays with transmission related information that are not publicly available to all other OASIS users, and which are to be treated in accordance with LADWP's Standards of Conduct
- LADWP shall ensure that all EMS displays containing transmission system information shall be inaccessible to LADWP employees engaged in the Wholesale Merchant Functions through the use of limited EMS displays assignments to each computer console.
- Additions or modifications to the access rights of employees engaged in the Wholesale Merchant Function shall be made upon written permission from the LADWP Director of system Planning & Projects, or from the LADWP Chief Load Dispatcher of Grid Operations, and shall only be permitted in accordance with these Standards of Conduct. A record of such written authorizations shall be maintained for auditing purposes.

The Transmission System Operations/Reliability Function employees can access the following information on the EMS system: generator operating conditions, generation capability data, generation cost data, generator availability and maintenance schedules, system frequency, time error, net interchange (aggregate), automatic generation control information, system reserve, weather data, inadvertent energy, power/energy/ancillary services transactions represented by merchant and transmission operations employees, internal system load (internal load data does not allow Wholesale Merchant Function employees to determine specific load of transmission customers), forecasted system load, historical system load, LADWP control area ancillary services requirements, condition of the transmission system, operational planning for scheduled transmission outages, ATC calculations, transmission constraints, curtailments, system security, scheduled or unscheduled transmission outage records, planned transmission maintenance and construction activities, transmission schedules, real-time information about the transmission system (such as loading, capacity rating and ATC), third party loads and transmission pricing

The Wholesale Merchant Function employees have access only to the information listed above that does not contain non-public transmission information, including: generator operating conditions, generation capability data, generation cost data, generator availability and maintenance schedules, system frequency, time error, net interchange (aggregate), automatic generation control information, system reserve, weather data, inadvertent energy, power/energy/ancillary services transactions involving Wholesale Merchant Functions employees, internal

system load (internal load data does not allow Wholesale Merchant Functions employees to determine specific load of transmission customers), forecasted system load, historical system load, and LADWP control area ancillary services requirements.

The unauthorized access to transmission related information on the EMS by LADWP employees engaged in Wholesale Merchant Functions shall be a dual discipline violation of these Standards of Conduct and may subject the employee to disciplinary action.

c. *LAN System Security.* Wholesale Merchant Functions employees share a Local Area Network (LAN) with Transmission System Operations/Reliability Functions employees. The LAN contains information related to transmission system operations. The Wholesale Merchant Functions employees shall not have access to transmission system information from the LAN system as a result of the following protective measures:

- LADWP employees engaged in Wholesale Merchant Functions activities shall be assigned network user identification and assigned to a network users group.
- LADWP shall ensure that all files and directories containing transmission system information shall be inaccessible to LADWP employees engaged in the Wholesale Merchant Functions through the use of passwords and restricted access rights associated with each network user identification.
- Additions or modifications to the access rights of employees engaged in the Wholesale Merchant Function shall be made upon written permission from the LADWP Director of System Planning and Projects, or from the LADWP Chief Load Dispatcher of Grid Operations, and shall only be permitted in accordance with FERC's Standards of Conduct. A record of such written authorizations shall be maintained for auditing purposes.

The Transmission System Operations/Reliability Function employees can access the following information on the LAN system: generator operating conditions, generation capability data, generation cost data, generator availability and maintenance schedules, system frequency, time error, net interchange (aggregate), automatic generation control information, system reserve, weather data, inadvertent energy, power/energy/ancillary services transactions represented by merchant and transmission operations employees, internal system load (internal load data does not allow Wholesale Merchant Function employees to determine specific load of transmission customers), forecasted system load, historical system load, LADWP control area ancillary services requirements, condition of the transmission system, operational planning for scheduled transmission outages, ATC calculations, transmission constraints, curtailments, system security, scheduled or unscheduled transmission outage records, planned transmission maintenance and construction activities, transmission schedules, real-time

information about the transmission system (such as loading, capacity rating and ATC), third party loads and transmission pricing

The Wholesale Merchant Functions employees have access only to the information listed above that does not contain non-public transmission information, including: generator operating conditions, generation capability data, generation cost data, generator availability and maintenance schedules, system frequency, time error, net interchange (aggregate), automatic generation control information, system reserve, weather data, inadvertent energy, power/energy/ancillary services transactions involving Wholesale Merchant Functions employees, internal system load (internal load data does not allow Wholesale Merchant Functions employees to determine specific load of transmission customers), forecasted system load, historical system load, and LADWP control area ancillary services requirements.

The unauthorized access to transmission related information on the LAN system by LADWP employees engaged in the Wholesale Merchant Function shall be a discipline violation of these Standards of Conduct and may subject the employee to disciplinary action.

d. ECC Intranet Network System Security. Wholesale Merchant Functions employees share an ECC Intranet Network System (a network of computers internal to LADWP that share information through WebPages) with Transmission System Operations/Reliability Functions employees. The Intranet contains information related to transmission system operations. The Wholesale Merchant Functions employees shall not have access to transmission system information from the Intranet system as a result of the following protective measures:

- LADWP employees engaged in Wholesale Merchant Functions activities shall be prevented from accessing transmission related information through the use of “ip addresses.” These addresses (a set of four numbers separated by dots) shall uniquely identify the computers that shall not have the “web pages” with transmission system information.
- Additions or modifications to the access rights of employees engaged in the Wholesale Merchant Function shall be made upon written permission from the LADWP Director of System Planning & Projects, or from the LADWP Chief Load Dispatcher of Grid Operations, and shall only be permitted in accordance with FERC’s Standards of Conduct. A record of such written authorizations shall be maintained for auditing purposes.

The Transmission System Operations/Reliability Function employees can access the following information on the Intranet system: weather data, earthquake data, ECC computer statuses (computers that are either down or running), LADWP operations summary (information contains real-time LADWP generation,

capacity, net power for load, operating reserves, net interchange, and losses; there is no transmission information in it) LADWP generation summary, LADWP real-time and historical system load graphs, LADWP receiving station bank loads, Supervisory Control and Data Acquisition event search, power system MWH data and major path power flows.

The Wholesale Merchant Functions employees have access only to the information listed above that does not contain non-public transmission information, including: weather data, earthquake data, ECC computer statuses, LADWP operations summary (as indicated above, there is no transmission information in it), LADWP generation summary, LADWP real-time and historical system load graphs (load graphs do not allow Wholesale Merchant Functions employees to determine specific load of transmission customers).

The unauthorized access to transmission related information on the intranet system by LADWP employees engaged in the Wholesale Merchant Function shall be a violation of these Standards of Conduct and may subject the employee to disciplinary action.

All LADWP employees are also subject to LADWP's Information Security Standards and Procedures, which include restrictions prohibiting the disclosure of user passwords and the use of access privileges by an individual other than the individual with the original privileges.

X. Implementing Tariffs

- A. Employees of LADWP engaged in Transmission System Operations/Reliability Function shall strictly enforce all tariff provisions relating to the sale or purchase of open access transmission service, if these provisions do not provide for the use of discretion.
- B. Employees of LADWP engaged in Transmission System Operations/Reliability Function shall apply all tariff provisions relating to the sale or purchase of open access transmission services in a fair and impartial manner that treats all customers (including LADWP's employees conducting Wholesale Merchant Functions) in a non-discriminatory manner, if these provisions involve discretion.
- C. LADWP shall keep a log detailing the circumstances and manner in which it exercised its discretion under any terms of the tariff. The information contained in this log shall be posted on the OASIS by the Chief Compliance Officer within 24 hours.
- D. LADWP shall not, through its tariff or otherwise, give preference to sales for resale by the Wholesale Merchant Function, over the interests of any other wholesale

customer in matters relating to the sale or purchase of transmission service (including issues of price, curtailments, scheduling, priority, ancillary services, *etc.*).

- . If LADWP offers discounts to purchases made for its Wholesale Merchant Functions, then it must, at the same time, offer on the OASIS the same discounts for comparable service to all Transmission Customers.

XI. Chief Compliance Officer

The Chief Compliance Officer for LADWP is **Mohammed Beshir** Telephone number: **(213) 367-0237**, e-mail address: mohammed.beshir@ladwp.com In addition to answering employee questions and coordinating audits and investigations as necessary, the Chief Compliance Officer is responsible for assuring:

- . All officers and directors with access to transmission information or information concerning gas or energy purchases, sales or marketing functions receive Standards of Conduct training and a copy of such standards.
- . All employees receiving training sign a document certifying that they have been trained regarding the Standards of Conduct requirements, and that all records relating to training, including a log of all training sessions held (attendees, leaders of training, etc.), and the certificates noted above, are maintained. That a periodic refresher training course takes place for previously trained employees.
- . LADWP keeps a log detailing the circumstances and manner in which it exercised its discretion under any terms of the tariff, and that posting on the OASIS are made within 24 hours of the discretionary act.
- . LADWP keeps reports in which it explains any deviations from the standards of conduct due to a reliability emergency.
- . These written compliance procedures are kept current and posted at all times on the OASIS.
- . The off-OASIS communications log discussed in Section VIII B is maintained.
- . Periodic internal spot checks are conducted within the Department to assure compliance with Standard of Conduct requirements.
- . All information required to be posted pursuant to these Standards of Conduct is timely posted and retained.

XII. Training

- . *Employee Training.* Employee training sessions are to be given to the following categories of employees: (1) Senior management; (2) Transmission System Operations/Reliability Function employees; (3) Wholesale Merchant Function employees; and (4) Additional identified Shared employees.
- . *New Employees.* New employees with access to transmission information or information concerning gas or electric purchases, sales or marketing functions will receive comprehensive training under the supervision of the Chief Compliance Officer or its designee. This training will be based upon these Standards of Conduct.
- . *Tracking System.* The Chief Compliance Officer is to maintain a tracking system to identify employees who require training, whether as a result of being newly hired or transferring within the company.
- . *Annual Refresher Course.* LADWP employees who have previously received standards of conduct training will receive annual refresher training. Such training will include a review of the standards of conduct requirements as well as training relating to any updates or changes in the standards of conduct that have taken place over the course of the year.
- . *Signed Certification and Maintenance of Training Records.* All employees receiving training in Standards of Conduct sign a statement certifying that they have received such training. The Chief Compliance Officer will maintain records of all training sessions held, including the date, time and list of attendees, and will make such records and the signed employee certification available for appropriate agency review.

XIII. Public Place Posting of Standards of Conduct

LADWP shall maintain in a public place these Standards of Conduct as to enable customers to determine that LADWP is in compliance with its stated goal of providing transmission service to all its customers on a non-discriminatory basis.

XIV. Employee Distribution of Standard of Conduct Implementation and Compliance Procedures

This set of comprehensive and detailed compliance procedures is to be distributed to all employees pursuant to Standard of Conduct requirements.

APPENDIX A: GLOSSARY OF TERMS

Chief Compliance Officer means: LADWP officer, or its designee, that has amongst his duties to monitor compliance with these Standards of Conduct requirements. The Chief Compliance Officer may be contacted at (213) 367-XXXX.

OASIS means: LADWP's Open Access Same-Time Information System.

System Emergency means: any abnormal system condition that could adversely affect the reliability of the electric system and which requires automatic or immediate manual action to limit loss of transmission facilities or generation supply.

Transmission Customer means: any eligible customer (or its designated agent) that can or does execute a transmission service agreement or can or does receive transmission service, to include but not limited to LADWP in its Wholesale Merchant Function capacity.

Transmission System Operations/ReliabilityFunction means: the receiving and responding to requests for transmission service through the OASIS, determining Available Transmission Capability (ATC) and total Transmission Capability (TTC), energy scheduling, transmission system operations, real-time interchange scheduling, power system planning, and generation operations.

Wholesale Merchant Function means: the sale for resale, or purchase for resale, of electric energy in interstate commerce by LADWP.