



**Tampa Electric Company
Standards of Conduct Procedures
Posted: 01/21/22**

Effective Date: 01/21/22

Introduction

Each employee of Tampa Electric Company (Tampa Electric), TECO Energy, Inc., and the Peoples Gas System Division of Tampa Electric, is individually responsible for strict adherence to the following standards of conduct procedures. These standards of conduct procedures and other related information are available to employees on Tampa Electric's Regulatory Affairs' Federal Energy Regulatory Compliance intranet website.

Employees should address any questions on how to interpret or apply the following procedures or the underlying Federal Energy Regulatory Commission ("FERC") Standards of Conduct rules to Tampa Electric's Standards of Conduct interim Compliance Program Manager ("CPM"), David Crabtree, at (813) 228-4464 or dacrabtree@tecoenergy.com . Any deviation from or need to change the following procedures should be immediately reported to the CPM. Failure to comply with these procedures may result in disciplinary action.

The CPM is responsible for establishing, updating and communicating these procedures to employees as part of the Regulatory Compliance function under the direction of Frank L. Busot, Regulatory Compliance Officer, and David Crabtree, Director, Federal Regulatory Affairs, Compliance & Transmission Policy.

Functional Separation

The FERC Standards of Conduct rules are intended to ensure that integrated utilities like Tampa Electric that operate transmission and generation facilities don't provide a competitive advantage to their wholesale electric marketing function employees, by providing them with non-public information regarding the transmission system. The rules require functional separation of employees within Tampa Electric. Employees in the wholesale electric marketing function must operate separately from employees in the transmission function. Non-public transmission information must be identified and secured so that employees in the marketing function do not gain access to such information. All employees are subject to the "no conduit" rule and must not provide non-



public transmission information to marketing function employees. This document explains the physical, cyber and functional procedures employees must follow in order to comply with the functional separation requirements.

Marketing and Transmission Function Employees

In order for employees to follow the functional separation and information restriction procedures, each employee must first understand which employees perform the affected functions.

Marketing Function Employees:

Marketing function employees are those employees¹ of Tampa Electric who actively and personally engage, on a day-to-day basis, in the sale for resale in interstate commerce, or the submission of offers to sell in interstate commerce, of electric energy, or physical transmission rights. This includes employees engaged in decision-making roles in the price, as well as non-price, terms and conditions of sales contracts, including umbrella agreements. This includes the real-time power traders located on Plaza 7, their supervisor, the director and managing director, as well as risk-management employees responsible for negotiating credit, financial, and legal terms of sales contracts. A list of current marketing employees is available by accessing the employee roster on the company intranet website, selecting search option “FERC (M or T),” and entering “M” as a search term,

Transmission Function Employees:

Transmission function employees are those employees of Tampa Electric who actively and personally engage on a day-to-day basis in the day-to-day operation of the transmission system, including the studying, granting and denying of transmission service requests. This includes those involved in short-term real-time operations, including those making operational decisions in advance of real time, but does not include those involved in long-range planning. Transmission function employees include the Energy System Operators, their trainer and supervisor located in the Energy Control Center, the Director, Energy Control Center, the Manager, Transmission Tariff and Contracts and his back-up, the Director, Tariffs Compliance and FRCC Relations, the Manager, Unit Commitment, the Compliance Manager (ED), the Manager of System Planning and staff, and the Manager of Grid Operations and staff. A list of current transmission function employees is available

¹ The term “employees” includes contractors, consultants or agents performing this function for Tampa Electric.



by accessing the employee roster on the company intranet website, selecting search option “FERC (M or T),” and entering “T” as a search term,

The functional separation rules require that transmission and marketing function employees operate separately and that all non-marketing function employees must not act as “conduits” or sources of restricted information.

Transmission Information Restrictions

The Vice President in charge of Electric Delivery and Asset Management ED/ES, and his/her designees, is responsible for identifying and securing restricted transmission information. All employees are individually responsible for ensuring that they do not provide such information to marketing function employees.

In order to adhere to these information restrictions, employees must understand what specific information cannot be shared with marketing function employees. For purposes of these procedures, restricted transmission information is any information about the short-term real time operation of the transmission system that has not been posted or made available on a public website or other forum, such as regulatory proceedings or the media. This includes, but is not limited to the following types of information:

- Real-time transmission flows
- Real-time transmission equipment status
- Non-Posted available transmission capability (ATC)
- Non-Posted curtailments
- Real-time balancing information

Employees are encouraged to call the CPM at any time to address any questions about information restrictions.

Physical Access Restrictions

All employees who have access to or possess restricted transmission information in their offices or work areas are individually responsible for securing such information such that marketing function employees cannot gain access to that information. Restricted transmission information should not be left in open areas, conference rooms, halls or other areas open to marketing function employees. For the most part, restricted transmission information is contained within the Energy Control Center Control Room, the office of the



Manager Transmission Tariff and Contracts, and via access to certain computer directories and applications.

- Marketing function employees are restricted from entering the following work areas, which are protected by card-key access:
 - Card-keyed areas of the Energy Control Center
 - Card-keyed area of the Ybor office containing the back-up EMS system for the Energy Control Center.

Employees in the above work areas shall promptly report to the CPM the presence of any marketing function employee in the above-mentioned work areas.

Emergency Access: Marketing function employees may have access to the restricted areas during actual emergency operations, as reported to the CPM in accordance with the procedures posted on the TECOnet Emergency Management website. Such access must be reported to the CPM immediately or as soon as possible so that the CPM can post and report such emergency deviations to FERC.

The Vice Presidents of Electric Delivery and Asset Management ED/ES and Information Technology and CIO, or their designees, are responsible to ensure that marketing function employees are not granted card-keys to the restricted areas and to conduct annual audits to ensure no marketing function employee has a card-key.

Cyber Access Restrictions

Each employee is individually responsible for ensuring that he/she does not improperly share restricted transmission information through e-mail communication, proxy rights, intranet sites, or shared bulletin boards.

All marketing function employees do not have access and must not attempt to gain access to any and all Tampa Electric software applications and directories that contain restricted transmission information. A list of such applications and directories, and their designated “owners” responsible for approving employee access, is maintained by the Energy Delivery Department.

All employees are responsible for promptly notifying the CPM if they discover that a marketing function employee has access to the restricted transmission applications and directories. Upon receipt of such notice, the CPM is responsible for ensuring that such improper access is promptly terminated. Marketing function employees may have access



to transmission information obtained through public means, through the transmission OASIS website, or through entities other than Tampa Electric.

The Vice President in charge of Information Technology and CIO, and his/her designees, are responsible for ensuring that new access to the restricted applications and directories is provided by the Information Technology security function only after approval by the “owner”, and is secured at the “user ID” and “password” level. The “owner” is responsible to ensure that access to applications or directories containing restricted transmission information is not approved for marketing function employees.

The Vice President of Electric Delivery and Asset Management (ED/ES), and his/her designees, are responsible for identifying and securing email distribution lists used to routinely distribute restricted transmission information. “Owners” of each such list are responsible for ensuring that no marketing function employees are added to these lists. The CPM monitors transfers and additions of new marketing function employees and advises “Owners” of these changes and verifies that access to restricted applications and directories previously provided to employees who transfer to marketing function positions is revoked within seven business days of the transfer.

The Vice President of Information Technology and CIO, and his/her designees, are responsible for conducting annual audits of access to restricted applications and directories, interface applications and views of applications available to marketing function employees, and the CPM conducts annual audits of restricted email distribution lists to ensure no marketing function employees are included on the distribution lists.

Communications and Meeting Procedures

- Emails sent by “T” to “M” employees are automatically copied to the Compliance Program Manager.
- Daily Unit Commitment Calls
 - Operations Planning sets up the video recording of the daily calls, reminds participants about the Standards of Conduct rules at the beginning of each call, and asks participants to identify themselves.
- Routine Periodic Calls Between Energy System Operators and Traders (including supervisors)
 - All phones used for such calls are automatically recorded on CallParrot
- Meetings or Calls Between “M” and “T” employees regarding transmission service or generation interconnection requests
 - Must be recorded using CallParrot



- Annual affidavits signed by all “M” employees stating that they understand the Standards of Conduct rules and that no restricted transmission information was improperly divulged to them that wasn’t immediately reported to the Compliance Program Coordinator.

Generation Dispatch Communication Process

Employees may provide information about the dispatch, availability of Tampa Electric’s network resources, or information necessary to maintain the reliability of the system to marketing function employees on a regular basis over recorded phone lines and/or electronically through e-mail or through shared programs and databases.

During daily recorded communications, employees may discuss subjects including the availability, maintenance plan and status of Tampa Electric’s network resources and associated dispatch costs, forecasted network load, daily unit commitment and generation dispatch plan, including any “must-run” units, forecasted power supply shortages, power purchases arranged by the marketing function employees, the status of gas availability as reported by the marketing function employees, and the availability of any additional generating capacity that can be sold off-system.

Books and Records

The Vice President Finance who is in charge of Accounting, and his/her designees, are responsible for ensuring that Tampa Electric’s books of account and records are maintained separately from those of its energy affiliates.

Accounting procedures for charging the Tampa Electric Wholesale Marketing & Sales function for deposits under the Transmission Tariff:

- 1) Record the incoming deposit as a credit to a balance sheet account (with a sub-account established for each request) in the Transmission Planning function accounting records, and correspondingly record the outgoing deposit as debit to a balance sheet account (with a sub-account established for each request) in the Wholesale Marketing & Sales function accounting records.
- 2) Costs incurred to complete the study request will be debited to the appropriate balance sheet sub-account in the Transmission Planning function accounting records.
- 3) After all the requested study work is completed and accounted for, the net balance due will be charged from the Transmission Planning function to the Wholesale Marketing &



Sales function, which will net the balance sheet accounts to zero. The Wholesale Marketing & Sales function will debit the full amount of the study cost to an appropriate capital, O&M or recoverable expense account to reflect the full cost of the study in its accounting records.

Training

The CPM is responsible for training employees about their obligations under the standards of conduct.

The CPM develops and administers annual training and certification on the Standards of Conduct rules. All marketing and transmission function employees, as well as other employees likely to work closely with these groups and who might have access to restricted transmission information are identified by the CPM and required to take the annual training. The CPM is also responsible for identifying new employees who are required to take the training and ensure they do so not longer than 30 days from the date of hire.

Transmission Tariff Administration

The Manager Transmission Tariff and Contracts shall be responsible for administration of, and strict adherence to, the terms and conditions of Tampa Electric's OATT and OASIS rules and for ensuring that transmission access to Tampa Electric's transmission system is provided in a non-discriminatory manner, in accordance with FERC rules, regulations and orders. The Manager Transmission Tariff and Contracts will post all uses of discretion not allowed by the OATT provisions. The Manager Transmission Tariff and Contracts shall promptly report any transmission customer complaints to the CPM, who shall be responsible for monitoring the resolution of any such complaints to ensure compliance with the standards of conduct. The CPM is responsible for monitoring compliance with OATT and OASIS regulations.

Enforcement

The CPM is responsible for the Standards of Conduct compliance program, including ongoing monitoring and compliance, and the communication of these procedures to employees. The CPM will arrange for periodic independent internal and external compliance audits, as needed.

The CPM keeps a log of all compliance issues brought to the CPM's attention and follows up to resolve all such issues with employees, and, as necessary, their supervisors, senior



management, and ultimately with the Regulatory Compliance Officer, Frank L. Busot, who reports to and through Tampa Electric’s Chief Ethics and Compliance Officer, who has direct access to the Tampa Electric Board of Directors and through Emera Incorporated’s (Emera’s) Chief Ethics and Compliance Office to the Emera board of directors.

The CPM shall post or report all deviations from the Standards of Conduct to FERC, as required.

Change/Reason Log

Date	Summary of Change	Reason for Change	Changed By
6/29/09	P. 5, in the Communications and Meeting Procedures section -- Added the Tandberg Video Conferencing System as an acceptable recording device for M/T meetings.	M employees requested this and have demonstrated that it works, can be monitored by the CPC, and recordings will be stored for at least 5 years.	Gail McKaig



10/1/09	P. 1 and P. 7: Updated name of Regulatory Compliance Officer	Change in personnel	Gail McKaig
11/23/09	P. 2: Added that M function includes non-price terms and conditions, and T function includes studies of requests.	Implement Orders 717-A and 717-B – new definitions of marketing and transmission functions	Gail McKaig
7/8/10	P. 5: Added follow-up by CPC to ensure personnel transferred to M positions have access rights to restricted T info revoked within 7 days.	Access incident in June, 2010, indicated a need for improvement in this process	Gail McKaig
6/22/11	P. 5: Removed quarterly audits by IT	The applications that were audited quarterly are no longer on the restricted application lists	Gail McKaig
8/12/11	Meeting procedures revised to add annual affidavit signed by M employees in lieu of recording all discussions between M and T employees	To reduce burdensome procedures not necessary for compliance	Gail McKaig
4/22/14	Updated CPC and Regulatory Officer names. Added information for generating lists of current marketing and transmission function employees by using the search function of the online employee roster. Changed effective date and posted dates.	Account for changes in assignments and procedures	Ralph Painter
1/21/22	Updated CPM and Regulatory Officer names. Changed effective date and posted dates. Changed the methodology for WebEx recordings of the daily Morning Calls and	Account for changes in assignments and procedures	David Crabtree



	maintenance of these records for 3 years.		
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