

**Standards of Conduct ID: SOC 2015-1**

Date: February 18, 2016

**Submitted by:**

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**Issue:**

In November, 2015, as part of Westar's Quarterly Standards of Conduct (SOC) compliance review, Westar discovered that the listing of job titles and job descriptions of the transmission function employees were not timely updated on the Westar OASIS page in accordance with SOC §358.7(f)(1) following a reorganization of that group which occurred on August 17, 2015. As a result, the abbreviated organizational chart included with the posting showing the reporting structure of the System Planning department was not timely updated. As stated in SOC §358.7(g)(1), the changes to titles and job descriptions were not posted on the Westar OASIS page within seven (7) days of the effective date.

**Reason:**

Although Westar's SOC Quarterly review process requires the organizational charts to be submitted to the supervisors over the transmission function employees to ensure accuracy, no changes were indicated. The email request sent from Regulatory Compliance requested a review of the org chart posting and the supervisors interpreted this as only reviewing the organizational chart, and not the titles and job descriptions. In addition, no notice of a change in job titles or descriptions were sent to Regulatory Compliance and/or the Standards of Conduct Chief Compliance Officer (SOC CCO) at the time the changes occurred.

**Impact:**

The impact is minimal to non-existent. No unauthorized access to non-public transmission information occurred. The Transmission and Generation System Operations department was generally reorganized and that department did not add or lose any transmission function employees. In addition, the entire System Planning department moved over to the System Operations and Transmission Development department and started reporting to the Executive Director, System Operation and Transmission Development. One Distribution Engineer was moved to the Transmission Planning group and the group was renamed to "System Planning". Outside of a few ministerial job title changes, the only significant change was in the Director of Transmission and

## Final Report

Generation System Operations who was also given supervisory authority over Transmission Accounting.

### **Resolution:**

Due to the misinterpretation of the email request, a change in the quarterly review process has been made to ensure the requests for review by the appropriate supervisors clearly indicating that they must review the job titles and job descriptions as well as the organizational chart.

Although the review of the organizational chart, job titles, and job descriptions are part of the operational procedures, to further strengthen the requirement Westar's Policy 4 – Standards of conduct Compliance Review was modified to include such a verification as part of the Quarterly Review.

Even though the Transmission Planning group gained one engineer, the position is a distribution function and, therefore, there were no substantive changes to the actual transmission function employees (*i.e.* actual people) populating the old and new organizational charts. Attached below are the updated policies, the old and new organizational charts with job descriptions.

Westar's Policy 2 – Standards of Conduct Prompt Posting has also been revised so that it clearly requires that written notification of any changes to the job titles, job descriptions, or organization chart affecting transmission function employees must be sent to Regulatory Compliance and the SOC CCO either prior to the change or immediately following the change so the notice can be posted within seven (7) days of the change.

Westar's Policy 5 – Standards of Conduct Organization chart has also been revised to include the requirement of the immediate supervisor(s) over the transmission function employees to promptly notify Regulatory Compliance and the SOC CCO of any change to the title and job descriptions of transmission function employees.

A discussion was held with the Executive Director, System Operation and Transmission Development, the Director of Transmission and Generation System Operations, and the Manager of System Planning to explain the issue and to emphasize that it is their responsibility to provide written notification to Regulatory Compliance and the SOC CCO of any change to the transmission function employees job titles and/or job descriptions in accordance with the revised Policy 2.

### **OASIS Revision History:**

2015/12/15: Original report posted on OASIS.

2015/12/22: Revised CCO from Dennis Reed to Jeff Martin. Added old and new Organizational Charts.

2016/1/15: Added the timeline and minor edits.

2016/2/18: Corrected a typo in the first paragraph. The correct year is 2015 not 2014.

## Corporate Policies

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### FERC Regulatory Policies

#### Policy 2 – Standards of Conduct Prompt Posting

#### Applies To Total Company

#### Standards of Conduct Prompt Posting Policy

**Approved By:** Dennis L. Reed  
**Original Effective Date:** 07/01/2005  
**Date of Previous Version:** 02/01/2009  
**Effective Date:** 12/01/2015

#### PRINCIPLE:

Westar Energy is committed to strict compliance with laws and regulations governing our business activities. This policy addresses how Westar Energy will ensure prompt posting of improperly disclosed transmission information per FERC regulatory requirements.

Company employees engaged in the Marketing Function are prohibited from having preferential access to any information about the transmission system that is not equally available to all OASIS users per FERC regulation. [§ 358.5]

#### PRACTICE:

- I. Westar Energy will post information regarding the status of the transmission system on the Company's OASIS or utilizing the Southwest Power Pool's (SPP) OASIS.
- II. All employees, contractors, consultants or agents of Westar Energy are prohibited from transmitting or communicating any information to those employees engaged in the marketing function except through public communication made available to all OASIS users at the same time. [§ 358.6]
- III. Limited information regarding the transmission system may be released to any transmission customer in response to a request for service as specified in the Company's Open Access Tariff or other applicable Open Access Tariff. Such information may be provided to Marketing Function employees concerning conditions affecting their transactions pursuant to FERC voluntary procedures. Also, such information may be provided to Marketing Function employees acting as agent for transmission customers concerning conditions affecting the transactions of such customers pursuant to FERC Standard of Conduct Policy No. 6. Exceptions to the above rules prohibiting disclosure of information to the Marketing Function may be granted when it is necessary to share crucial operating information with the Marketing Function in order to maintain reliability of transmission system. Such instances will be posted on the Company's OASIS within 24 hours.
- IV. If information about the transmission system that is not posted on the Company's OASIS, or on the SPP OASIS, is disclosed to any person or persons engaged in the Marketing Function in a manner contrary to the requirements of these Standards, the incident must be reported to Regulatory Compliance immediately and posted on the Company's OASIS within 24 hours. Details regarding the type of information supplied, to whom it was supplied, when and the circumstances surrounding the disclosure must be provided. Failure to supply information regarding such disclosures will result in disciplinary action, up to and including discharge.

- V. Westar Employees will consider any information acquired from non-affiliated Transmission Customers or potential non-affiliated transmission customers or developed in the course of responding to requests for transmission service or ancillary service as confidential and will not convey such information to any employee, contractor, consultant or agent engaged in the Marketing Function, except to the limited extent information is required to be posted on the Company's OASIS in response to a request for transmission service or ancillary services.
- VI. A non-affiliated transmission customer may voluntarily consent, in writing, to allow the Company to share the non-affiliated customer's information with the Marketing Function employees. Notice of such voluntary consent must be posted on the Company's OASIS pursuant to Policy 6 – Standards of Conduct Affiliate Access to Customer Information.
- VII. Transfers of personnel between Transmission Function and the Marketing Function are permitted; however, a notice of the transfer must be posted on the Company's OASIS before the transfer takes place and remain posted for 90 days.
- VIII. Westar Energy will utilize the Southwest Power Pool's (SPP) OASIS system as its OASIS server. Public information regarding the Company's transmission system and open-access transmission tariff will be posted, or made accessible through this site.
- IX. Westar Energy shall post any changes to the job titles and/or job descriptions of any transmission function employee within seven (7) days of such change in accordance with Policy 5 – Standards of Conduct Organization Chart.

**SUMMARY:**

Westar Energy is committed to complying with FERC Regulations and Orders and will engage in prompt posting of any transmission information that is preferentially disclosed to Marketing Function.

# Corporate Policies

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## FERC Regulatory Policies

### Policy 4 – Standards of Conduct Compliance Review

#### Applies To Total Company

#### Standards of Conduct Compliance Review Policy

**Approved By:** Dennis L. Reed  
**Original Effective Date:** 07/01/2005  
**Date of Previous Version:** 02/01/2009  
**Effective Date:** 12/01/2015

#### PRINCIPLE:

Westar Energy is committed to strict compliance with laws and regulations governing our business activities. This policy addresses how Westar Energy will ensure compliance with FERC requirements governing disclosures of non-public transmission information, including access to transmission areas and databases as well as electronic communications.

#### PRACTICE:

- I. On a quarterly basis, Westar Energy shall review compliance with FERC requirements utilizing these methods:
  - A. Westar Energy will produce and review reports from the magnetic card reader system for all areas of the company which have restricted access to protect Transmission Function information. Currently these areas are: the third (3<sup>rd</sup>) floor of the General Office Building, lower level of the 800 Kansas building and the Wichita System Control Center (Restricted Access Areas).
  - B. Westar Energy will review for improper access and produce a User Access report for all Restricted Access Areas.
  - C. Westar Energy will produce User Access reports from all shared electronic systems including Energy Management System, Energy Accounting System, and any other shared electronic systems to verify that security access is properly updated and maintained ensuring transmission information is secure.
  - D. Westar Energy will randomly select e-mail communications between Transmission Function Employees and Generation Marketing Employees for review. The review will be based on a random sampling of e-mails generated between these two employee groups. A report summarizing the review will be created. Such report shall include a description of any improper communications and remedial steps taken.
  - E. Westar will validate the currently posted job postings and job descriptions for all Transmission Function employees by sending the posting to the supervisor(s) over the transmission function area(s).
- II. Documentation of such reviews shall be retained for a period of five years.
- III. Instant messaging between Transmission Function Employees and Marketing Function employees is strictly prohibited.

- IV. Westar will maintain a record of calls made to the Standards of Conduct Chief Compliance Officer and Westar Energy's Hotline relating to the Standards of Conduct requirements and related regulations. The CCO will prepare memoranda documenting and explaining how issues raised by such calls were resolved.

**SUMMARY:**

Westar Energy is committed to meeting the requirements of FERC regulations and Orders.

# Corporate Policies

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## FERC Regulatory Policies

### Policy 5 – Standards of Conduct Employee Information

#### Applies To Total Company

#### Standards of Conduct Organization Chart Policy

**Approved By:** Dennis L. Reed  
**Original Effective Date:** 07/01/2005  
**Date of Previous Revision:** 02/01/2009  
**Effective Date:** 12/01/2015

#### **PRINCIPLE:**

Westar Energy is committed to strict compliance with laws and regulations governing our business activities. This policy addresses how Westar Energy will ensure compliance with FERC requirements regarding the identification of transmission function employee information [§358.7(f) and (g)].

#### **PRACTICE:**

- I. Westar Energy will post on its Intranet site the titles and job descriptions of its transmission function employees. The supervisor(s) over the transmission function employees are required to notify Regulatory Compliance and the Standards of Conduct Chief Compliance Officer of any such changes to the titles and/or job descriptions of transmission function employees either prior to or immediately following the effective date. The information on the Intranet site shall be updated within seven (7) days upon any change.
- II. Every quarter, the Company's OASIS links will be tested to ensure accuracy of links. The review will be documented with results found and any corrections will be made immediately.
- III. Upon the discovery of any problems related to the posting of the above information, the Standards of Conduct Chief Compliance Officer will submit a report to FERC Enforcement describing such problems noted and the corrective actions, if necessary, taken.
- IV. Documentation of audits shall be retained for a period of five years.

#### **SUMMARY:**

Westar Energy is committed to meeting the requirements of FERC Regulations and related Orders.

# Old Organizational Chart and Job Descriptions



## **Organizational Chart**

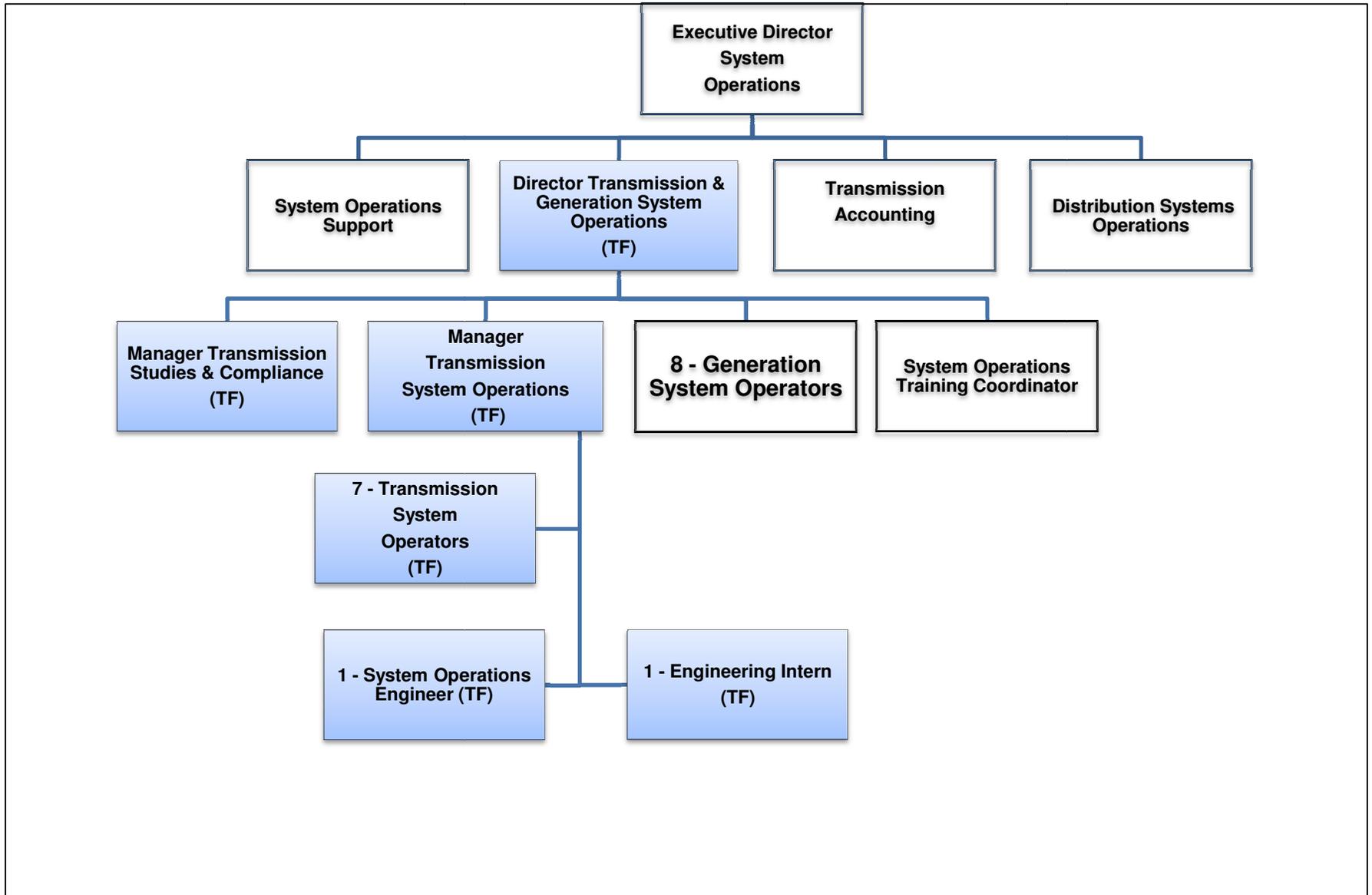
Pursuant to the regulations stated in Title 18, Chapter 1, Section 358.7(f) the following pages give the organizational chart and job descriptions of the Transmission Function employees as of March 31, 2014.

This posting eliminates the job titles which are not classified as Transmission Function employees, but does leave in the name of each functional area for reference.

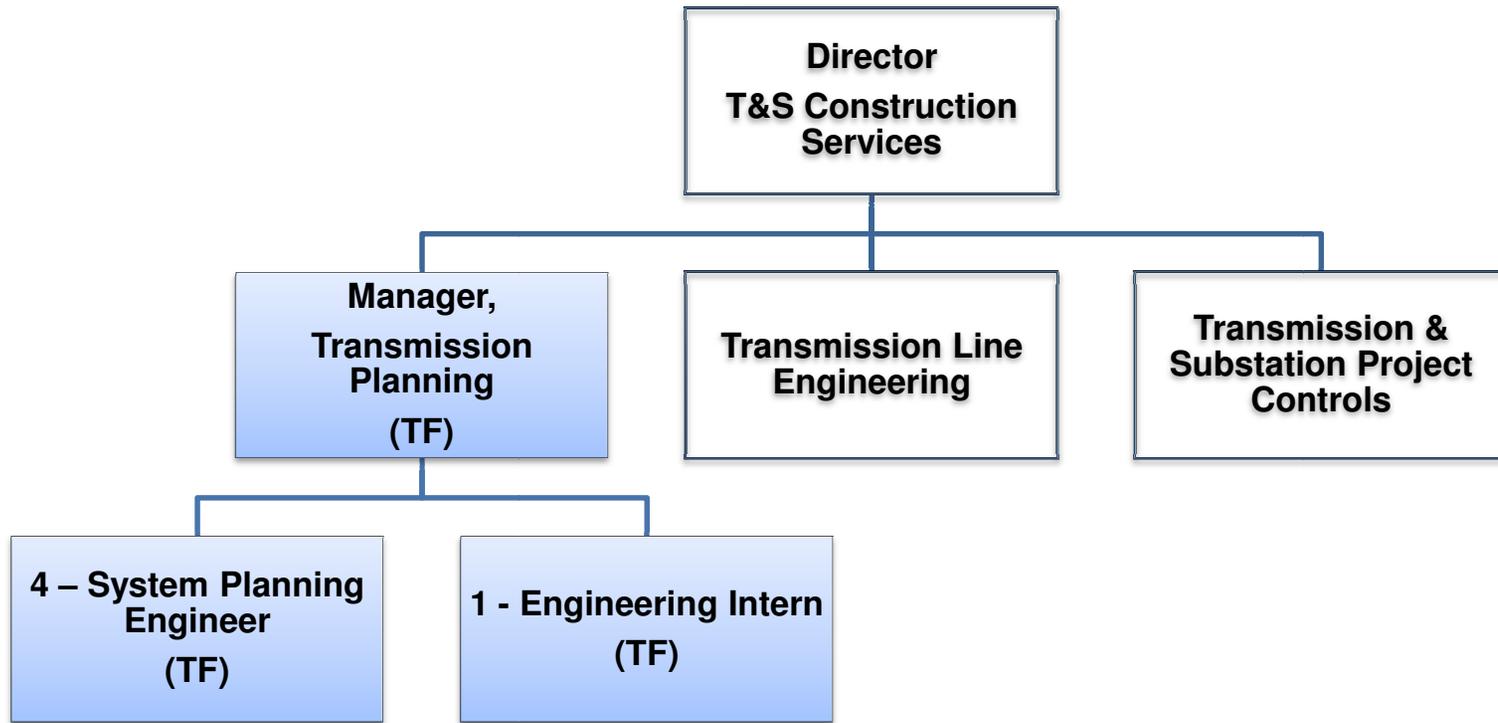
Questions regarding this posting can be directed to:

*Dennis Reed, SOC CCO  
Director, FERC Compliance  
Westar Energy  
785-575-1633  
dennis.l.reed@westarenergy.com*

# Transmission Operations



# Transmission Planning



## **Job Descriptions of the Transmission Function Employees**

### **Manager, Transmission Planning**

Directly supervise the transmission planning group, including assigning work, professional developmental and performance improvement. This position is responsible for customer planning study requests and the short term and long term planning of Westar electric transmission system. Responsible for applying various NERC Reliability Standards and Regional Criteria and FERC tariff requirements (SPP and NERC) when developing these plans. Responsible for such items as responding to transmission or generation interconnect requests on Westar's transmission system, transmission configuration reporting requirements for the various FERC reporting, for the development of SPP models, completing and reporting the NERC and SPP seasonal planning models, support of systems operations and participating in and supporting various regional groups and activities.

### **Director, Transmission & Generation System Operations**

Direct the day to day operations of Westar's electric transmission and generation system in a safe, efficient and reliable manner while maximizing its availability and utilization in a nondiscriminatory manner. This shall be accomplished through direct supervision of the Manager of Transmission System Operations and Operations Engineer, exercising authority over all transmission operations, coordination with distribution, generation, regional authorities, and other departments and in the development of appropriate emergency policies and procedures. Review, comment and attend meetings on new NERC and SPP policies and FERC orders in order to address the Company's interest and ensure regulatory compliance.

### **Manager, Transmission Studies and Compliance**

This position provides technical support and consultation services to the Transmission Systems Operations and the Transmission Maintenances & Construction group, insures and reports NERC compliance with established operations standards, active member on various NERC/SPP working groups, work with various internal departments, and Power Pool offices. This position is responsible for transmission system studies to support system operations. This includes such studies as contingency, stability and major system disturbances. Recommends content and supports the Transmission Operations Training. Responsible for the development of Transmission related regional and NERC transmission operations and planning/compliance programs. Responsible for completing assigned FERC and NERC reporting. This position also provides technical support and consultation services to the Transmission Systems Operations and the Transmission Maintenances & Construction group. insuring and reporting NERC compliance with established operations standards, active member on various NERC/SPP working groups, work with various internal departments, and Power Pool offices.

### **Manager, Transmission System Operations**

Directly supervise the Transmission System Operators and oversee the 24x7 operations of the Transmission System Control Center. This includes such activities as the executing and maintaining real-time power flow and contingency analysis programs, coordinating operations with the SPP Reliability Coordinators, reviewing and recommending changes to operational policies, normal and emergency procedures and directives, evaluating clearance requests and approving switching orders, coordinating outages and construction schedules, developing and implementing various operational tools and EMS features, and making recommendations to the construction budget. Position is also responsible for the continued development and administration of the Transmission System Operator training program to meet NERC requirements and maintain System Operator certifications, as well as providing backup assistance for the Director of Transmission & Generation System Operations as required.

### **Transmission System Operator**

Transmission System Operator shall have at least six (6) months experience as Assistant Transmission System Operator who have successfully completed job related tests and are qualified through education, experience, and physical ability to perform duties of Transmission System Operator. This position is responsible for the safe and reliable day-to-day operation of the transmission system.

### **System Operations Engineer**

Under supervision of manager transmission operations, assists in the study of real-time operations of the transmission system. Also assists in developing and implementing various operational tools and EMS features, preparing drawing, reports and other duties as assigned.

### **Engineering Intern, Transmission Operations**

Under supervision of manager transmission operations, assists in the study of real-time operations of the transmission system. Also assists in the preparing drawing, paperwork and other duties as assigned.

### **Engineering Intern, Transmission Planning**

Under supervision of manager transmission planning, assists in long term and short term studies of the transmission system. Also assists in the preparing drawing, paperwork and other duties as assigned.

### **System Planning Engineer**

Perform Engineering functions for the Transmission Planning Department and provide support for Transmission System Operations. Responsibilities include such items as conducting system studies for various company and regional firm and network transmission request, generation and transmission interconnection requests, developing 10 year construction budget proposals, determination of transmission transfer capabilities, insuring and reporting NERC compliance with established planning standards, active member on various NERC/SPP working groups, and providing analytical support to Operations. Successful Candidate will work with various internal departments, other company system planning departments and Power Pool offices.

# New Organizational Chart and Job Descriptions



## **Organizational Chart**

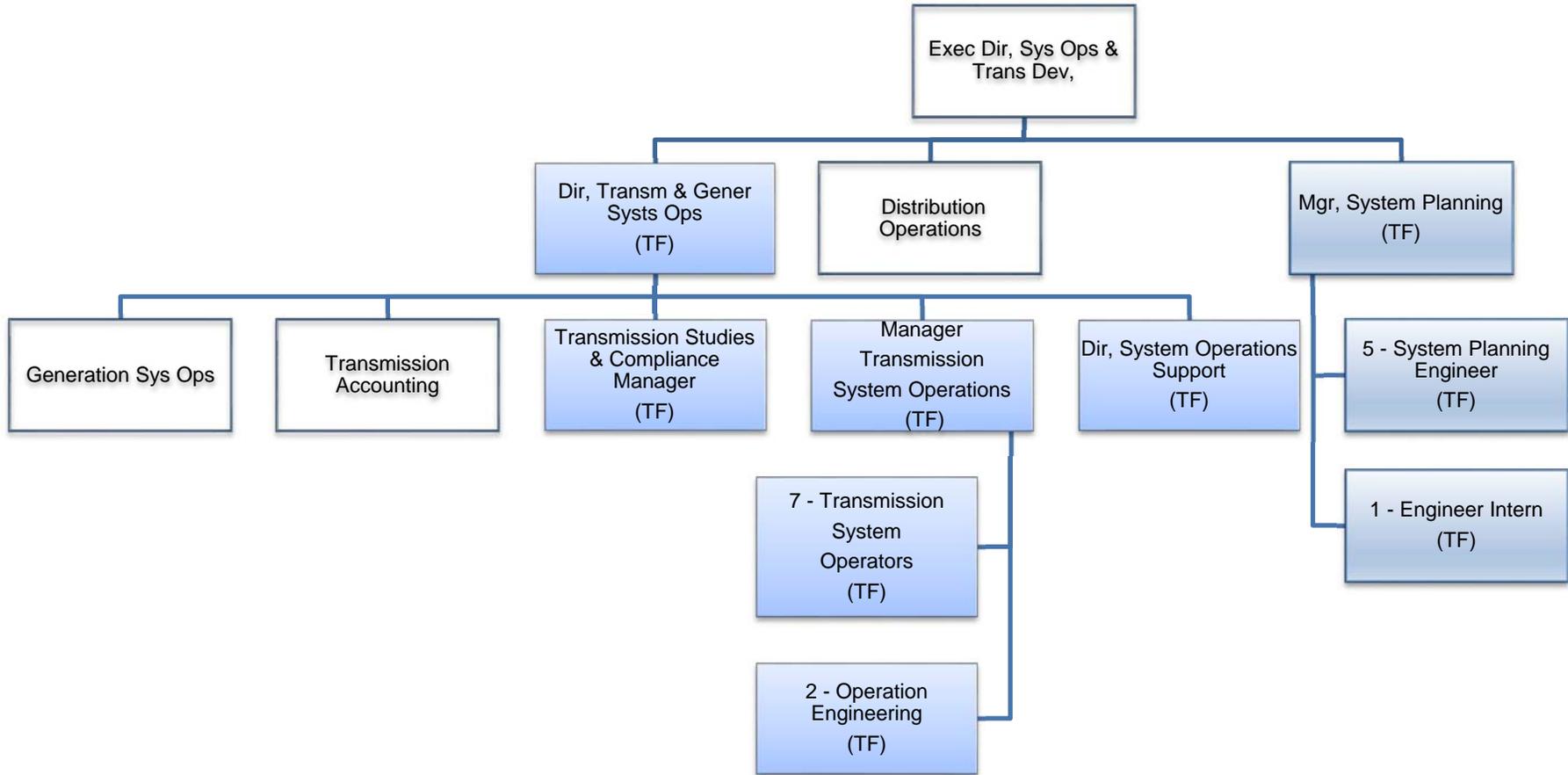
Pursuant to the regulations stated in Title 18, Chapter 1, Section 358.7(f) the following pages give the organizational chart and job descriptions of the Transmission Function employees effective August 17, 2015.

This posting identifies that System Planning now reports to the Exec Dir, Sys Ops & Trans Dev, Transmission Operations, and updated several job descriptions.

Questions regarding this posting can be directed to:

*Jeff Martin, SOC CCO  
VP, Regulatory Affairs  
Westar Energy  
785-575-6362  
[jeff.martin@westarenergy.com](mailto:jeff.martin@westarenergy.com)*

# Transmission Operations



## **Job Descriptions of the Transmission Function Employees**

### **Manager, System Planning**

Directly supervise the transmission and distribution planning group, including assigning work, professional developmental and performance improvement. This position is responsible for customer planning study requests and the short term and long term planning of Westar electric transmission system. Responsible for applying various NERC Reliability Standards and Regional Criteria and FERC tariff requirements (SPP and NERC) when developing these plans. Responsible for such items as responding to transmission or generation interconnect requests on Westar's transmission system, transmission configuration reporting requirements for the various FERC reporting, for the development of SPP models, completing and reporting the NERC and SPP seasonal planning models, support of systems operations and participating in and supporting various regional groups and activities.

### **Director, Transmission & Generation System Operations**

Directly supervise directors, managers and various subject matter experts involved with the 24x7 operations of the transmission and generation system operations. Responsible for keeping abreast of industry changes and propagating this knowledge through the affected areas to ensure all operations activity are in compliance with both internal policies and NERC rules and regulations. Supports the operations function through (1) development of compliance strategies, (2) coordinating and implementing changes to support industry and regulatory changes, (3) actively participating in and monitoring changes in business practices at FERC, NERC, RTO, ISO and other such organizations, (4) assisting in the continued development and administration of the various training programs to meet NERC requirements to maintain operator certifications, (5) ensuring the appropriate accounting of interchange transactions with various wholesale entities, (6) keeping policies and procedures appropriately documented for regulatory and audit compliance, and (7) creating miscellaneous reports and presentations.

### **Director, System Operations Support**

Subject matter expert involved with the 24x7 operations of the transmission and generation system operations. Responsible for keeping abreast of industry changes and propagating this knowledge through the affected areas to ensure all operations activity are in compliance with both internal policies and NERC rules and regulations. Supports the operations function through (1) development of compliance strategies, (2) coordinating and implementing changes to support industry and regulatory changes, (3) actively participating in and monitoring changes in business practices at FERC, NERC, RTO, ISO and other such organizations, (4) assisting in the continued development and administration of the various training programs to meet NERC requirements to maintain operator certifications, (5) keeping policies and procedures appropriately documented for regulatory and audit compliance.

### **Transmission Studies and Compliance Manager**

This position is responsible for short-term transmission system studies initiated by Westar Energy, regional and national organizations, legislative and regulatory bodies. This includes such studies as stability and major system disturbances. Recommends content and supports the transmission operations. Responsible for the development of transmission related regional and NERC transmission operations and planning/compliance programs. Responsible for completing assigned FERC and NERC reporting. This position also provides technical support and consultation services to the transmission operations & construction group.

### **Manager, Transmission System Operations**

Directly supervise the transmission system operators and oversee the 24x7 operations of the transmission system control center. This includes such activities as the executing and maintaining real-time power flow and contingency analysis programs, coordinating operations with the SPP Reliability Coordinators, reviewing and recommending changes to operational policies, normal and emergency procedures and directives, evaluating clearance requests and approving switching orders, coordinating outages and construction schedules, developing and implementing various operational tools and EMS features, and making recommendations to the construction budget. Position is also responsible for the continued development and administration of the transmission system operator training program to meet NERC requirements and maintain system operator certifications.

### **Transmission System Operator**

This position is responsible for the safe and reliable day-to-day operation of the transmission system. A transmission system operator shall have at least six (6) months experience as an assistant transmission system operator and will have successfully completed job related tests and are qualified through education, experience, and physical ability to perform duties of transmission system operator.

### **Engineering Intern, System Planning**

Under supervision of manager transmission planning, assists in long term and short term studies of the transmission system. Also assists in the preparing drawing, paperwork and other duties as assigned.

### **System Planning Engineer**

Responsibilities include such items as conducting system studies for various company and regional firm and network transmission request, generation and transmission interconnection requests, developing 10 year construction budget proposals, determination of transmission transfer capabilities, ensuring and reporting NERC compliance with established planning standards, active member on various NERC/SPP working groups, and providing analytical support to transmission operations. Provide support and long-term outage coordination for transmission system operations.

### **Operation Engineer**

Responsibilities include such items as conducting system studies for various company and short-term load analysis, ensuring and reporting NERC compliance with established standards, and providing analytical and tool support to operations. Provide support and short-term outage coordination for transmission system operations.