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**PROCEDURES TO IMPLEMENT FERC ORDER NO. 717**  
**STANDARDS OF CONDUCT FOR TRANSMISSION PROVIDERS**  
**DOMINION ENERGY QUESTAR PIPELINE, LLC; QUESTAR SOUTHERN**  
**TRAILS PIPELINE COMPANY; DOMINION ENERGY OVERTHRUST**  
**PIPELINE, LLC; WHITE RIVER HUB, LLC;**  
  
**AND**  
  
**VIRGINIA ELECTRIC AND POWER COMPANY (DOMINION ENERGY**  
**VIRGINIA)<sup>1</sup>**

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**I. Definitions** *(Capitalized terms in these Procedures have the following meanings)*

**Affiliate**

means an entity that controls or is controlled by or is under common control (10 percent or more) with Dominion Energy, Inc, including a division that operates as a functional unit. “Control” means the direct or indirect authority, whether acting alone or in conjunction with others, to direct or cause to direct the management policies of the Affiliate.

**Chief Compliance Officer (CCO)**

means the employee identified on the Internet Website who is responsible for managing compliance with the Standards of Conduct. Dominion Energy’s Chief Compliance Officer is Carlos M. Brown, Senior Vice President and General Counsel 120 Tredegar Street, Pump House 3<sup>rd</sup> Floor, Richmond, VA 23219, (804) 819-2690, Carlos.M.Brown@dominionenergy.com.

**Dominion Energy**

means Dominion Energy, Inc., and its Affiliates.

**Employee**

means employee, contractor, consultant or agent of Dominion Energy.

**FERC or Commission**

means the Federal Energy Regulatory Commission or any successor agency thereof.

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<sup>1</sup> Dominion Energy South Carolina, Inc. has posted separate procedures to implement FERC Order No. 717, Standards of Conduct for Transmission Providers on its OASIS.

**Internet Website**

means a location on [www.dominionenergy.com](http://www.dominionenergy.com) where a Dominion Energy Transmission Provider posts certain information required by the Standards of Conduct. The Transmission Provider may also use its proprietary Information System or the OASIS or Electronic Bulletin Board (EBB) to post certain information required by the Standards of Conduct.

**Intranet Website**

means a location on Dominion Energy's corporate data network that is accessible only to Dominion Energy employees. Information on this network may be available to all employees (e.g. telephone directory, Ethics program Intranet Websites, etc.) or may be restricted to certain employees through software access controls.

**Marketing Affiliate**

means Affiliates of Dominion Energy with Marketing Function Employees, which include:

Dominion Energy Solutions, Inc., Dominion Energy Fuel Services, Inc., Public Service Company of North Carolina, Dominion Energy Generation Marketing, Inc., Dominion Energy Virginia – Power Generation Regulated Operations Energy Supply, and Dominion Energy South Carolina, Inc., Power Marketing.

**Marketing Function:**

For Gas: means the sales for resale in interstate commerce, or the submission of offers to sell in interstate commerce, natural gas, subject to the following exclusions: 1) bundled retail sales; 2) incidental purchases or sales to operate interstate natural gas pipeline transmission facilities; 3) sales of natural gas solely from a seller's own production; 4) sales of natural gas solely from a seller's own gathering or processing facilities; or 5) 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 7(f) of the Natural Gas Act.

For Electric: means the sales 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 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.

**Marketing Function Employee (MFE)**

means an employee, contractor, consultant or agent of Dominion Energy who actively and personally engages on a day-to-day basis in marketing functions.

**Procedures** means these Procedures designed to Implement FERC Order No. 717, Standards of Conduct for Transmission Providers pursuant to 18 C.F.R. Section 358.7(d).

**Services Company** means Dominion Energy Services, Inc.

**Standards of Conduct** means the rules governing the relationship between TFEs and MFEs as established by FERC in Order No. 717, Standards of Conduct for Transmission Providers.

### **Transmission**

For Gas: means natural gas transportation, storage, exchange, backhaul, or displacement service provided pursuant to subparts B or G of Part 284 of FERC's regulations.

For Electric: means electric transmission, network or point-to-point service, ancillary services or other methods of electric transmission, or the interconnection with jurisdictional transmission facilities pursuant to Part 35 of FERC's regulations.

### **Transmission Customer**

means any eligible customer, shipper or designated agent that (1) can or does execute a transmission service agreement or (2) can or does receive transmission service, including persons with pending requests for transmission service or 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. Directed at short-term real time operations, including decisions made in advance of real time that are directed at real time operations. Transmission Functions do not include long-range planning.

### **Transmission Function Employee (TFE)**

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. The Internet Website will identify the job titles and job descriptions of TFEs. Examples of TFEs include employees in the following areas: Gas Control or System Operations Centers, System Optimization, Pipeline Operations, Transportation and Customer Services, and Interstate Marketing.

Generally, employees in the following areas are NOT TFEs (unless they are involved in day-to-day operations): Field, Maintenance and Construction, Engineers, Technical Support Staff, Human Resources, Information Technology, Storage Engineers, Pipeline Safety, Measurement, Business Development, Attorneys, Accountants, Risk Management, Regulatory Personnel, Rate Design, Strategic Planning, Clerical.

### **Transmission Function Information**

means information relating to Transmission Functions, as defined above, that is not otherwise also available to the general public without restriction, all users of E-SCRIPT or the Internet Website, as applicable. This can include, but is not limited to, past, present and future information about: transmission maintenance schedules, transmission customer information, curtailments of transmission service, available transmission capacity, including storage, transmission service requests and request status,

transmission service pricing offers, transmission outages, expansion plans and schedules, Cove Point LNG ship schedules, transmission line outage information and transmission loading relief information.

**Transmission Provider** means Cove Point LNG, LP,<sup>2</sup> Dominion Energy Questar Pipeline, LLC, Questar Southern Trails Pipeline Company, Dominion Energy Overthrust Pipeline, LLC, White River Hub, LLC, Dominion Energy Virginia, and Dominion Energy South Carolina, Inc.

## **II. Applicability**

These Procedures implement the Standards of Conduct and apply to the relationship and communications between TFEs including employees with Transmission Function Information and MFEs. All TFEs, MFEs, and all other employees, including senior management and supervisory personnel, are responsible for adhering to these Procedures.

## **III. General Principles of the Standards of Conduct**

The general principles of the Standards of Conduct are as follows:

- A. A Transmission Provider must treat all customers on a not unduly discriminatory basis, and must not grant undue preferences, especially to its Affiliates;
- B. A Transmission Provider's TFEs must function independently from its Affiliate MFEs;
- C. A Transmission Provider must not disclose or use a conduit to disclose non-public Transmission Function Information to its Affiliate MFEs; and
- D. A Transmission Provider must provide equal access to non-public Transmission Function Information to all its customers, except in the case of confidential customer information or Critical Energy Infrastructure Information (CEII).

## **IV. General Rules & Requirements of the Standards of Conduct**

The general rules and requirements of the Standards of Conduct include the following:

- A. Non-Discrimination Requirements (See Section V below)
- B. Independent Functioning Rule (See Section VI below)
- C. No-Conduit Rule (See Section VII below)
- D. Transparency Rule (See Section VIII and XI below)

## **V. Non-Discrimination Requirements**

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<sup>2</sup> Dominion Energy owns 50% of Cove Point LNG, LP (Cove Point); BHE GT&S, LLC and Brookfield Asset Management each own 25% of Cove Point; BHE GT&S, LLC operates Cove Point and has posted procedures to implement the Standards of Conduct.

The Transmission Provider must treat all Transmission Customers, whether affiliated or not, on a not unduly discriminatory basis, and must not operate its Transmission system to give preferential benefits to its Marketing Affiliates. This requirement shall be implemented pursuant to the following standards:

- A. The Transmission Provider will strictly enforce all tariff provisions relating to the sale or purchase of open access transmission service, if these tariff provisions do not permit the use of discretion.
- B. The Transmission Provider will apply all tariff provisions relating to the sale or purchase of open transmission service in a fair and impartial manner that treats all Transmission Customers in a non-discriminatory manner, if the tariff provisions permit the use of discretion.
- C. The Transmission Provider may not, through its tariff or otherwise, give undue preference to any person in matters relating to the sale or purchase of transmission service (included issues of price, curtailment, scheduling, priority, ancillary services or balancing).
  - 1. Tariff Waivers – To the extent the Transmission Provider waives a tariff provision in favor of an Affiliate; it must be posted on its Internet Website. The Transmission Provider must also maintain a log of such waivers which must be retained for five years. “Exercises of discretion” that are allowed in the Transmission Provider’s tariff, or which have been approved by the Commission, do NOT have to be posted or recorded in the waiver log.
- D. The Transmission Provider will process all similar requests for transmission service in the same manner and within the same period of time.

## **VI. Independent Functioning Rule**

- A. **GENERAL RULE:** TFEs must function independently of any MFEs, which means they shall not perform any Marketing Functions or perform any work for any MFE, except as noted below.
- B. **GENERAL RULE:** MFEs will not conduct Transmission Functions for the Transmission Provider.
- C. Facilities:
  - 1. If TFEs work in the same building as MFEs, the TFE’s work space shall be physically separated and restricted to the maximum extent practical from MFEs. Shared facilities that staff both TFEs and MFEs are listed on the Internet Website.

2. MFEs will not have access to the Transmission Provider's Gas Control or System Operations Centers, or any similar Transmission Provider facilities used for day-to-day transmission operations or reliability functions that differs in any way from the access available to other Transmission Customers. Access to these facilities will be restricted by cardkey or other appropriate means on a 24-hour basis.
3. MFEs will not have access to the Transmission Provider's commercial function and system operations area that differs in any way from the access available to other Transmission Customers. Access to these facilities will be restricted by cardkey or other appropriate means on a 24-hour basis. MFEs may have access to these areas upon appropriate registration/sign-in and will be escorted throughout the visit.
  - a. Cardkey Access
    - (i) An automated "Employee Transfer/Termination Notification" program will alert Cardkey administrators to revoke applicable facility access from employees that have been transferred or terminated from a TFE position.
    - (ii) Dominion Energy's Corporate Security or other appropriate personnel will review cardkey access lists to ensure their accuracy.

#### 4. Emergency Exception

In emergency circumstances affecting system reliability, the Transmission Provider may take whatever steps necessary to keep or restore system operation, including exchanging non-public Transmission Function Information between TFEs and MFEs necessary to maintain or restore operation of the transmission system or generating units, or that may affect the dispatch of generating units.

Record of Communication – Record **must** be made as soon as practicable. Please refer to Section VII.D.1 for further details.

#### 5. Reliability Standards Exception

In order to maintain compliance with the Reliability Standards approved by the FERC, the Transmission Provider may exchange certain non-public Transmission Function Information between TFEs and MFEs.

Record of Communication – Contemporaneous record **must** be made of the exchange. Please refer to Section VII.D.1 for further details.

## **VII. No Conduit Rule**

- A. GENERAL RULE: The Transmission Provider is prohibited from using anyone as a

conduit for the disclosure of non-public Transmission Function Information to its MFEs.

- B. **GENERAL RULE:** Transmission Provider employees, contractors, consultants or agents AND employees, contractors, consultants, or agents of an Affiliate with MFEs are prohibited from disclosing non-public Transmission Function Information to MFEs.

## **VIII. Information Exchanges**

### A. Posting of Prohibited Disclosures:

1. Non-Public Transmission Information – The Transmission Provider must immediately post non-public Transmission Function Information on the Internet Website if the Transmission Provider inadvertently discloses such information to an MFE.
2. Non-Public Transmission Customer Information and CEII – The Transmission Provider must immediately post notice on the Internet Website that the Customer Information or CEII information has been disclosed.
3. Exceptions to Posting:
  - a. Customer Voluntary Consent - If a non-affiliated transmission customer consents in writing to allow the Transmission Provider to share its customer information with an MFE, the Transmission Provider may share such information. The Transmission Provider will post notice on the Internet Website (EBB) of the consent along with a statement that it “did not provide any preferences, either operational or rate-related, in exchange for the voluntary consent.”
  - b. Specific Requests Relating to Transmission Provider Service - The Transmission Provider is not required to disclose on the Internet Website information regarding a Marketing Affiliate’s specific request for transmission service (i.e. confirmations, nominations, schedules with upstream producers, interconnecting pipelines), including discussions with the Marketing Affiliate with respect to the Marketing Affiliate’s participation in capacity expansion or new development projects. This exception does not apply to outages or other system conditions. The Law Department- Federal Regulation recommends that a record of the meeting or communication be made and retained as best practice. See Section VII.D.1.b. (ii) for further details.
  - c. Emergencies - The Transmission Provider may share non-public Transmission Function Information between TFEs and MFEs to maintain or restore operation of the transmission system or generating units. A record of any such meetings or communications under this exception must be

maintained. See Section VII.D.1.b.(i) for further details.

- d. Reliability Standards Compliance – The Transmission Provider may share non-public Transmission Function Information between TFEs and MFEs pertaining to compliance with NERC or other Reliability Standards approved by FERC. A record of any such meetings or communications under this exception must be maintained. See Section VII.D.1.b.(i) for further details.

## B. Communications Between TFEs and MFEs:

1. GENERAL RULE: Order No. 717 and its regulations **permit** joint meetings between TFEs and MFEs as long as non-public transmission function information is not shared and the meetings do not relate to transmission or marketing functions. A joint meeting includes, but is not limited to, face-to-face meetings, telephone and conference calls.
  - a. Permitted Meetings or Communications Requiring Recordation between TFEs and MFEs where non-public Transmission Function Information is shared include the following limited situations (record of meeting or communication must be made and retained):
    - (i) the topic of the meeting is in response to an emergency concern that requires information sharing in order to maintain or restore operation of the transmission system or generating units; or
    - (ii) the topic of the meeting is to share non-public transmission information pertaining to compliance with FERC approved Reliability Standards. See Section VII.D.1.b. (i) for further details on required recordation.
  - b. Record of Joint Meetings between TFEs and MFEs
    - (i) Required Recordation - For exchanges between TFEs and MFEs that are permissible under Section VII.D.1.a, a contemporaneous record must be made and maintained for a period of five years. 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; however, the record must be retrievable. In an emergency when a contemporaneous record cannot be made, the record must be made as soon as practicable after the fact.
    - (ii) Recommended Recordation – For exchanges between TFEs and MFEs that are permissible and where non-public Transmission Function Information is **not** disclosed, the Law Department recommends a contemporaneous record be made and maintained for a period of five



years as best practice.<sup>3</sup> 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.

- (iii) The Law Department recommends that Employees follow the Joint Meeting Procedures and Checklists which are available on the Law Department Intranet Website as best practice for both required and recommended recordation of a meeting or communication between TFEs and MFEs.
- (iv) Employees attending the joint meeting must be reminded to comply with the restrictions on the exchange of Transmission Function Information beyond what is allowed by the rules and regulations of FERC. Further, the joint meeting should only be held if the topic of the meeting is one of the topics permissible as identified in the Joint Meeting Procedures and Checklists. If it is unclear whether the topic is permissible, seek clearance from the Law Department - Federal Regulation.

#### C. Information Access “Best Practices:”

1. To implement the no-conduit requirement, the following “best practices” procedures should be followed by the Transmission Provider to ensure proper access to non-public transmission information:
  - a. The Transmission Provider should use the Internet Website to publicly disseminate to transmission customers, including its Marketing Affiliates, information required to be posted pursuant to the Standards of Conduct or other Commission regulations. All postings shall comply, if applicable, with the requirements of Part 284 of FERC’s regulations.
  - b. Dominion Energy’s IT department has erected and maintains appropriate password requirements, firewalls, and other security measures for all Transmission Provider’s information systems. The IT department should conduct a periodic review of passwords, firewalls, and other security measures to ensure that the integrity of the information systems is maintained. Such measures include:
    - (i) Transmission Function Information that is accessible via Dominion Energy’s Intranet Website shall be protected from access by MFEs. The IT department will ensure that the appropriate MFEs do not have access to Transmission Function Information on Dominion Energy’s Intranet

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<sup>3</sup> The Law Department has prepared Joint Meeting Procedures and Checklists that are recommended for all Dominion Energy Employees to use. The Joint Meeting Procedures and Checklists provide a list of permissible exchanges between TFEs and MFEs. Intranet Website link to [Gas Joint Meeting & Checklist](#) and [Electric Joint Meeting & Checklist](#)

Website.

- (ii) Transmission Function Information accessible via Dominion Energy's computer systems shall be protected from access by MFEs. MFEs are identified with an "M" after their name in the telephone directory and e-mail. TFEs are identified with a "T" after their name in the telephone directory and e-mail.
- (iii) An automated program monitors employee terminations and transfers daily and sends a notification to the CCO (or its designee) or applicable system administrators when a qualifying event occurs. When applicable, the CCO (or its designee) will adjust access to all affected computer systems, physical facilities and employee e-mail addresses to prevent inclusion on prior distribution lists.

## **IX. Additional Employee Responsibilities**

### **A. General:**

1. All Dominion Energy employees are individually responsible for strict compliance with Standards of Conduct and these Procedures. Dominion Energy does not condone or tolerate violations of the Standards of Conduct. Employees who fail to comply with these Standards of Conducts may be subject to disciplinary actions up to, and including, termination. In addition to the requirements set forth in these Procedures, all employees are asked when appropriate to consider the safeguards described below.
2. Prior to sharing Transmission Function Information with any Dominion Energy Employee outside of the Transmission Provider organization, employees should check to see whether the recipient is allowed to receive the Transmission Function Information under Standards of Conduct. If you are unsure about whether the information is Transmission Function Information, or whether the requestor is an MFE, consult the Company Directory, ask your supervisor or contact the Law Department - Federal Regulation.
3. Employees should clearly mark all e-mails, documents or other communications that contain Transmission Function Information with the following header or another substantially similar message: **"This communication contains FERC Order 717 Transmission Function Information that must be kept confidential. DO NOT copy or forward to any Marketing Function Employee without express clearance from Dominion Energy's Law Department."**
4. When possible, Employees should protect Transmission Function Information that is sent via an electronic method with passwords or non-copying/non-forwarding features enabled. Employees are encouraged to use the Code of

Conduct Classification Tool within the Company's electronic mail application. This functionality enables users to easily classify messages that contain sensitive content, such as Transmission Function Information. Once the sender marks a message as sensitive and the message is sent, the mail system validates each recipient prior to delivery to prevent any violation. This tool is available to all Dominion Energy Employees. Employees can find more information on this tool on the FERC Policy and Compliance SharePoint site on Dominion Energy's Intranet Website.

5. All Employees also must strictly comply with the "No Conduit" rule. The "No Conduit" rule means that although certain employees may have access to Transmission Function Information, they may never be a "conduit" or pass this Transmission Function Information to MFEs. In particular, employees of Marketing Affiliates who are not considered MFEs must be diligent not to pass any Transmission Function Information to MFEs. Also, employees who provide a corporate service function for both the Transmission Provider and Marketing Affiliates should not pass Transmission Function Information to any MFE.
6. In summary, Employees should abide by the following requirements:
  - Know the extent of access you have to Transmission Function Information.
  - Never act as a "conduit" by providing this information to an MFE.
  - If you are uncertain about whether the information is Transmission Function Information, or whether the requestor is an MFE, consult the Company Directory, ask your supervisor, or the Law Department - Federal Regulation.
  - Make sure Transmission Function Information received from the Transmission Provider is clearly marked as such to prevent inadvertent sharing of information.
  - Err on the side of caution by playing it safe and sharing Transmission Function Information only with employees who are clearly TFEs.

#### B. Marketing Function Employees:

1. MFEs must be aware of the information restrictions and the Independent Functioning Rules that apply between TFEs and MFEs. Generally, MFEs may not have access to Transmission Function Information unless it is obtained via a public source (e.g., the Internet Website). Also, MFEs must operate separately from the TFEs.
2. In practice, MFEs should abide by the following requirements:
  - Do not gain or attempt to gain access to Transmission facilities, including computer systems, or Transmission Function Information by any means. If you have access to Transmission facilities or Transmission Function Information or if you feel you have received access inappropriately, do not

review the information and report the incident immediately to your supervisor, or the Law Department - Federal Regulation.

- If Transmission Function Information is obtained inadvertently or otherwise in violation of the Standards of Conduct or these Procedures, do not use the information in any capacity and report the incident immediately to your supervisor, or the Law Department - Federal Regulation.

## **X. Chief Compliance Officer (CCO) Responsibilities.**

### **A. Duties of the CCO (or its designee) include:**

1. Identify and maintain a list of employees that must receive Standards of Conduct training. Ensure that all affected employees receive the necessary training on an annual basis.
2. Provide guidance on the FERC Standards of Conduct to all affected employees.
3. Monitor employee transfers between various Dominion Energy companies and departments. Ensure that appropriate actions are taken for employees that transfer into or out of the Transmission Provider organization and change from TFEs to MFEs, and vice versa. Actions include necessary postings on Internet Website and restrictions to facilities, including any computer systems.
4. Ensure proper documentation of Standards of Conduct issues and matters. Ensure that documentation is retained for requisite statutory period.
5. Monitor and update informational postings to ensure that data is current and correct, consistent with the procedures described in Section 0 below.

## **XI. Informational Posting Procedures**

### **A. Information to be Posted:**

The following information shall be maintained on the Internet Website by the CCO (or its designee). The CCO will update this information within seven business days of any change and will post the date the information was updated.

1. Names and addresses of Marketing Affiliates. This information will be derived and kept current through communications with the Dominion Energy Corporate Secretary's Department.
2. Complete list of employee-staffed facilities that are shared by both TFEs and MFEs.
3. The job titles and job descriptions of all TFEs.

4. Name and address of potential merger partners to the Transmission Providers that may employ or retain MFEs, within seven days after the potential merger is announced. For purposes of the Standards of Conduct, once a potential merger is announced the Standards of Conduct will apply as if the entity were already acquired or merged.
5. Information on employee transfers. The name of a TFE that transfers to a position as an MFE, or any transfer of an MFE to a position as a TFE. The information must be posted on the Internet Website for 90 days, and include the name of the transferring employee, the respective title held in the Transmission Function and Marketing Affiliate, and the effective date of the transfer. This information will be derived and kept current by Human Resources' information provided via automated reports.
6. Information Disclosure. The Transmission Providers must immediately post any non-public Transmission Function Information, non-public Transmission Customer Information or CEII that was disclosed to MFEs. See Section VII.C above.
7. Waivers. Notice of each waiver of a tariff provision that a Transmission Provider grants in favor of an Affiliate, unless such waiver has been approved by the FERC. See Section V.C.1 above.
8. Name of Chief Compliance Officer. Name and contact information of Dominion Energy's FERC Standards of Conduct CCO.
9. Notice of Customer Voluntary Consent. Notice of customer voluntary consent to allow the Transmission Provider to disclose customer information to MFEs. See Section VII.C.3.a above.
10. These Procedures. These Procedures will be kept current by the Law Department in conjunction with the CCO and the Transmission Providers.

## **XII. Training Procedures.**

### **A. Written Procedures:**

1. The following employees will receive an Intranet Website link to provide assistance and guidance on compliance. The link will include documents related to Standards and Codes of Conduct, helpful tools/guides and frequently asked questions. It will also include these Procedures:
  - Transmission Function Employees.
  - Marketing Function Employees.

- Officers, Directors, Supervisory and other employees of the Transmission Providers who are likely to become privy to Transmission Function Information
  - Officers, Directors, Supervisory and other employees of Affiliates of Dominion Energy (include Services Company Employees) to the extent they are likely to become privy to Transmission Function Information.
2. All Employees of Dominion Energy have access to these Procedures through the Internet Website or the searchable Intranet Website.

**B. Training:**

1. The following employees will be trained regarding FERC Standards of Conduct annually. These employees are required to certify (by signature or electronic certification) that they have participated in training:
- Transmission Function Employees;
  - Marketing Function Employees;
  - Officers, Directors, Supervisory and other employees, contractors, or agents of the Transmission Providers who are likely to become privy to Transmission Function Information; and
  - Officers, Directors, Supervisory and other employees, contractors, or agents of Affiliates of Dominion Energy (include Services Company Employees) to the extent they are likely to become privy to Transmission Function Information.
2. New Employees  
New TFEs, MFEs, officers, directors, supervisory employees, and any other employees, contractors, or agents likely to become privy to Transmission Function Information will be trained as soon as possible upon commencing employment, but no later than thirty (30) days after commencement. These employees are required to certify (by signature or electronic certification) that they have completed the training.

### **XIII. Other**

**A. Fines/Penalties:**

FERC has the ability to impose fines of over \$1 million per day per violation.

**B. Dominion Energy's Commitment to Compliance:**

Dominion Energy does not condone and will not tolerate violations of the Standards of Conduct. Employees that violate the Standards will be subject to disciplinary action, up to and including termination.

C. Contacts:

Employees should report any concerns immediately to your supervisor, to the Regulatory Compliance Department, or to the Law Department - Federal Regulation.

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**Dominion Energy Compliance Line:** 800-628-1798

**Dominion Energy Ethics and Compliance Online Resources:**

<https://ethicsandcompliance.alertline.com/gcs/welcome>