



**San Diego Gas & Electric Company**

**FERC Standards of Conduct**

***Procedures & Compliance Plan***

**January 2025**

## **I. INTRODUCTION**

This document describes San Diego Gas & Electric Company's ("SDG&E") compliance procedures (hereafter, "Compliance Plan") for implementing the Federal Energy Regulatory Commission's ("FERC") Standards of Conduct for Transmission Providers adopted in FERC Order 717, Order 717-A, Order 717-B, and Order 717-C (collectively, "Order 717").

In sections A and B of this Introduction, SDG&E summarizes several compliance mechanisms and guidelines that are central to its general compliance effort. Thereafter, this document addresses, on a rule-by-rule basis, the various requirements of Order 717's Standards of Conduct (codified at part 358, Chapter 1, Title 18, Code of Federal Regulations) with an associated, subsequent discussion of the procedures and mechanisms SDG&E has established to ensure compliance with each specific rule. This document describes SDG&E's most current information regarding its implementation and compliance controls and procedures for Order 717.

### **A. Oversight**

SDG&E is an electric and gas utility subsidiary of Sempra. SDG&E operates in California and, in addition to FERC, is regulated by the California Public Utilities Commission ("CPUC"). As discussed herein, SDG&E is a Transmission Provider under the Standards of Conduct because it owns, operates or controls facilities for the transmission of electric energy in interstate commerce (§358.3(k)). Neither SDG&E nor its affiliated gas utility, Southern California Gas Company, owns or operates an interstate natural gas pipeline that transports gas for others.

SDG&E's Federal Regulatory Compliance Department personnel oversee Standards of Conduct compliance at the company. The Sempra Chief Compliance Officer ("CCO") has oversight responsibility over company-wide compliance activities and each business CCO, including SDG&E's CCO, has oversight responsibility over relevant business compliance activities.

Each business CCO is responsible for the direction and oversight of the design and execution of a compliance management framework. This includes identifying the applicable laws and regulations related to such business and its compliance program and implementing the necessary mechanisms to ensure compliance with those laws and regulations, including assessing performance and addressing any necessary modifications.

## **B. Training and Communications**

SDG&E provides a comprehensive education and training program as a primary means for ensuring compliance with Order 717. This training, which includes knowledge testing, is provided to employees and agents, consultants and contractors likely to be privy to non-public transmission function information. The web-based training is a broad examination of Order 717's requirements. Personnel receive certification after they have successfully completed the training. An anti-conduit attestation is a required element of the training, and records of training are recorded in a database. Order 717 training is completed annually for applicable personnel and within the required 30 days for applicable, newly hired personnel.

SDG&E's Federal Regulatory Compliance Department personnel maintain an internal intranet web site where employees can access a variety of information regarding Order 717, including Order 717 itself, the Compliance Plan, and other related information such as a link to the required internet postings and training materials. This intranet site is maintained on an SDG&E corporate server and is accessible to all SDG&E employees.

## **II. STANDARDS OF CONDUCT**

### **A. § 358.1 Applicability**

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

## **PROCEDURES AND MECHANISMS FOR COMPLIANCE**

By its terms, §358.1 applies to a gas or electric Transmission Provider, as defined in the Standards of Conduct, that “conducts transmission transactions with an affiliate that engages in marketing functions.” The Standards of Conduct do not apply as between a Transmission

Provider and a gas or electric affiliate with a marketing function (as defined herein) that does not conduct transmission transactions with such an affiliate.

Per §358.3, SDG&E is defined as a Transmission Provider. Additionally, SDG&E has an internal department with a marketing function, the Energy Supply & Dispatch (“ES&D”) group, located within SDG&E’s Origination, Energy Supply and Dispatch Department, that engages in marketing functions. ES&D engages in, among other things, sales for resale of electricity in interstate commerce, and its employees are defined as Marketing Function Employees.

**B. § 358.2 General Principles**

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

**PROCEDURES AND MECHANISMS FOR COMPLIANCE**

SDG&E is a Transmission Provider under Order 717 and treats all transmission customers, affiliated and non-affiliated, on a non-discriminatory basis and does not share non-public information related to transmission operations with its Marketing Function Employees.

SDG&E personnel engaged in transmission functions (“Transmission Function Employees”), as defined in the Order 717 Standards of Conduct, function independently of SDG&E Marketing Function Employees and Marketing Function Employees within other Sempra affiliates. Transmission Function Employees do not engage in marketing functions, and Marketing Function Employees do not conduct transmission functions. Further, Marketing Function

Employees do not have access to nonpublic transmission function information or to SDG&E's facilities used for transmission operations.

**C. § 358.3 Definitions**

- (a) Affiliate of a specified entity means:
- (1) *Another person that controls, is controlled by, or is under common control with, the specified entity. An affiliate includes a division of the specified entity that operations as a function unit.*
  - (2) *For any exempt wholesale generator (as defined under 366.1 of this chapter), affiliate shall have the meaning set forth in 366.1 of this chapter, or any successor provision.*
  - (3) *“Control” as used in this definition means the direct or indirect authority, whether acting alone or in conjunction with others, to direct or cause to direct the management policies of an entity. A voting interest of 10 percent or more creates a rebuttable presumption of control.*
- (b) Internet website refers to the Internet location where an interstate natural gas pipeline or a public utility posts the information, by electronic means, required under this part 358.
- (c) Marketing functions means:
- (1) *in the case of public utilities and their affiliates, the sale for resale in interstate commerce, or the submission of offers to sell in interstate commerce, of electric energy or capacity, demand response, virtual transactions, or financial or physical transmission rights, all as subject to an exclusion for bundled retail sales, including sales of electric energy made by providers of last resort (POLRs) acting in their POLR capacity;*
  - (2) *In the case of interstate pipelines and their affiliates, the sale for resale in interstate commerce, or the submission of offers to sell in interstate commerce, natural gas, subject to the following exclusions:*
    - i. *Bundled retail sales,*
    - ii. *Incidental purchases or sales of natural gas to operate interstate natural gas pipeline transmission facilities,*
    - iii. *Sales of natural gas solely from a seller's own production,*
    - iv. *Sales of natural gas solely from a seller's own gathering or processing facilities, and*
    - v. *Sales by an intrastate natural gas pipeline, by a Hinshaw interstate pipeline exempt from the Natural Gas Act, or by a local distribution company making an on-system sale.*
- (d) Marketing functions employee means an employee, contractor, consultant or agent of a transmission provider or of an affiliate of a transmission provider who actively and personally engages on a day-to-day basis in marketing functions.
- (e) Open Access Same Time Information System or OASIS refers to the Internet location where a public utility posts the information required by part 37 of this

chapter, and where it may also post the information required to be posted on its Internet website by this part 358.

- (f) Transmission means electric transmission, network or point-to-point service, ancillary services or other methods of electric transmission, or the interconnection with jurisdictional transmission facilities, under part 35 of this chapter; and natural gas transportation, storage, exchange, backhaul, or displacement service provided pursuant to subparts B or G of part 284 of this chapter.
- (g) Transmission customer means any eligible customer, shipper or designated agent that can or does execute a transmission service agreement or can or does receive transmission service, including all persons who have pending request for transmission service or for information regarding transmission.
- (h) Transmission functions means the planning, directing, organizing or carrying out of day-to-day transmission operations, including the granting and denying of transmission service requests.
- (i) Transmission function employee means an employee, contractor, consultant or agent of a transmission provider who actively and personally engages on a day-to-day basis in transmission functions.
- (j) Transmission function information means information relating to transmission functions
- (k) Transmission provider means:
  - (1) Any public utility that owns, operates or controls facilities used for the transmission of electric energy in interstate commerce; or
  - (2) Any interstate natural gas pipeline that transports gas for others pursuant to subparts G or G part 284 of this chapter.
  - (3) A transmission provider does not include a natural gas storage provider authorized to charge market-based rates.
- (l) Transmission service means the provision of any transmission as defined in 358.3(f).
- (m) Waiver means the determination by a transmission provider, if authorized by its tariff, to waive any provisions of its tariff for a given entity.

## **PROCEDURES AND MECHANISMS FOR COMPLIANCE**

SDG&E's Compliance Plan is based on the definitions provided in this section as applicable.

### **Transmission Provider/Transmission Function Employees**

#### **San Diego Gas & Electric Company**

SDG&E is a Transmission Provider, as it is a public utility that owns, operates, or controls facilities used for the transmission of electric energy in interstate commerce. Since April 1998, pursuant to the California Independent System Operator Corporation's ("CAISO") FERC-approved Tariff, the CAISO has provided operational control of, and third-party access to,

SDG&E's transmission system. SDG&E does not itself operate or control the scheduling of electric transmission capacity on its jurisdictional transmission facilities. SDG&E Electric Grid Operations personnel engaged actively and personally in day-to-day transmission operations are designated as Transmission Function Employees, in accordance with Order 717. In addition, pursuant to the CAISO Tariff, the CAISO will continue to provide operational control of, and third-party access to, SDG&E's transmission system on a non-discriminatory basis.<sup>1</sup>

### **Marketing Function Employees**

#### **SDG&E**

As noted in §358.1 Applicability, SDG&E's ES&D group engages in marketing function activities as defined in Order 717, i.e., SDG&E's ES&D engages in the "*sale for resale in interstate commerce, the submission of offers to sell in interstate commerce, of electricity energy, or capacity, demand response, virtual transactions, or financial and physical transmission rights.*" ES&D schedules energy through the CAISO and is treated no differently than third-party entities requesting access to SDG&E's transmission system. In accordance with Order 717, certain ES&D personnel who actively and personally engage on a day-to-day basis in marketing functions are considered Marketing Function Employees. ES&D is separated both physically and functionally from the transmission function of SDG&E. ES&D does not have access to transmission system operations facilities or any SDG&E non-public transmission function information.

#### **Sempra Gas & Power Marketing, LLC**

Certain affiliate employees transacting on behalf of Sempra Gas & Power Marketing, LLC are engaged in selling energy for resale in California. These employees are physically and functionally separated from SDG&E and do not have access to SDG&E's non-public transmission function information. Sempra Gas & Power Marketing, LLC and any other

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<sup>1</sup> Southern California Gas Company ("SoCalGas"), an affiliate of SDG&E, is a local distribution gas company with no interstate pipelines. SoCalGas's Gas Acquisition Department engages in sales for resale of gas in interstate commerce but does not conduct transmission transactions on SDG&E's transmission system. Therefore, SoCalGas is not an affiliate with a marketing function under FERC's Standards of Conduct, and SoCalGas' employees engaged in sales for resale of gas in interstate commerce are not Marketing Function Employees.

affiliates that employ or retain Marketing Function Employees as defined in Order 717 are posted on SDG&E's internet site at [SDG&E's FERC Standards of Conduct - Order 717 Postings](#).

**D. § 358.4 Non-discrimination requirements**

- (a) *A transmission provider must strictly enforce all tariff provisions relating to the sale or purchase of open access transmission service, if the tariff provisions do not permit the use of discretion.*
- (b) *A transmission provider must apply all tariff provisions relating to the sale or purchase of open access transmission service in a fair and impartial manner that treats all transmission customers in a not unduly discriminatory manner, if the tariff provisions permit the use of discretion.*
- (c) *A transmission provider may not, through its tariffs or otherwise, give undue preference to any person in matters relating to the sale or purchase of transmission service (including, but not limited to, issues of price, curtailments, scheduling, priority, ancillary services, or balancing).*
- (d) *A transmission provider must process all similar requests for transmission in the same manner and within the same period of time.*

**PROCEDURES AND MECHANISMS FOR COMPLIANCE**

SDG&E's transmission system is under the operational control of the CAISO. As such, SDG&E does not have the ability to apply discretion, give undue preference or discriminatorily process requests for transmission service on its transmission system.

**E. § 358.5 Independent functioning rule**

- (a) *General rule. Except as permitted in this part or otherwise permitted by Commission order, a transmission provider's transmission function employees must function independently of its marketing function employees.*
- (b) *Separation of functions.*
  - (1) *A transmission provider is prohibited from permitting its marketing function employees to:*
    - i. *Conduct transmission functions; or*
    - ii. *Have access to the system control center or similar facilities used for transmission operations that differs in any way from the access available to other transmission customers.*
  - (2) *A transmission provider is prohibited from permitting its transmission function employees to conduct marketing functions.*



## **PROCEDURES AND MECHANISMS FOR COMPLIANCE**

### **Independent Functioning**

SDG&E utilizes the following physical and electronic procedures to comply with the independent functioning requirements of Order 717:

***Physical Security*** – SDG&E is primarily situated at its Century Park (“CP”) facility located in San Diego, California. Access to the entire CP facility is card-key controlled. SDG&E’s Marketing Function Employees do not have access to the transmission system control room or other facilities used for transmission operations. This separation is maintained by housing SDG&E’s Transmission Function Employees in buildings that are separated from the buildings where SDG&E’s Marketing Function Employees are located. SDG&E’s transmission operations are located in the buildings known as Electric Grid Operations or the Mission Control center, which are located several miles from CP. Physical access is controlled through a badge access system and is monitored on-site 24 hours per day by trained security personnel and remotely by central security personnel. Access to these transmission function buildings by Marketing Function Employees is prohibited. Similarly, access to SDG&E’s marketing function work areas is controlled through a badge access system monitored onsite 24 hours per day by trained security personnel and remotely by central security personnel.

Additionally, Marketing Function Employees in other Sempra affiliates are physically separated from SDG&E in different locations such as Sempra’s headquarters (“HQ”) building located in downtown San Diego. The HQ facilities are likewise controlled through a badge access system. SDG&E shared service personnel occupy separate suites in the HQ building and are located on separate floors away from Marketing Function Employees.

***Information Security Systems*** - SDG&E’s internal network for transmission functions is functionally separate from its intranet locations to which Marketing Function Employees have access. Access to SDG&E’s transmission function intranet is controlled using firewalls and logical access controls to prevent unauthorized access by its Marketing Function Employees. Access to SDG&E’s transmission function intranet site by SDG&E’s ES&D employees is also controlled using password protection, organizational code identification, internal filters, etc., to achieve the required separation. Firewalls are specialized security hardware and software designed to isolate networks that require different security policy enforcement mechanisms. In

addition to this industry standard approach to network security, the following types of information security systems provide additional levels of protection:

- Remote Access Security Software coupled with Multifactor Authentication
- Privileged Access Management
- Application Security

***Information Security Administration*** - In addition to the physical and security systems described above, unauthorized systems access is prevented via automated and manual information security administration tools and standard procedures, including:

- Individual Employee Identifications and Passwords
- Basic Access Rule is to Deny Access by Default (Least Privilege Principle)
- Security Handling of Terminated and Transferred Employees
- Special Security Handling of Affiliate Employee Access

Additionally, SDG&E and its affiliates each maintain their own IT systems and networks including separate contracts and licenses, directories, server and workstation hardware and software. Communications systems such as e-mail, directories and collaboration tools are also separated. Internal standards and guidelines are in place to manage the limited connectivity between the utilities/Sempra IT network and the affiliates' network for access to allowable shared services. These guidelines are approved by representatives of the respective companies' IT departments and compliance groups and are subject to audit by the Sempra Audit Services department.

**F. § 358.6 No conduit rule**

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

## PROCEDURES AND MECHANISMS FOR COMPLIANCE

### Information Access

An anti-conduit attestation is included in SDG&E's Standards of Conduct training. To successfully complete this training, impacted individuals are required to attest to their understanding of and compliance with the Anti-Conduit provision.

#### **G. § 358.7 Transparency rule**

- a) *Contemporaneous disclosure.*
  - (1) *If a transmission provider discloses non-public transmission function information, other than information identified in paragraph (a)(2) of this section, in a manner contrary to the requirements of §358.6, the transmission provider must immediately post the information that was disclosed on its Internet website.*
  - (2) *If a transmission provider discloses, in a manner contrary to the requirements of §358.6, non-public transmission customer information, critical energy infrastructure information (CEII) as defined in §388.113(c)(1) of this chapter or any successor provision, or any other information that the Commission by law has determined is to be subject to limited dissemination, the transmission provider must immediately post notice on its website that the information was disclosed.*
- b) *Exclusion for specific transmission information. A transmission provider's transmission function employee may discuss with its marketing function employee a specific request for transmission service submitted by the marketing function employee. The transmission provider is not required to contemporaneously disclose information otherwise covered by §358.6 if the information relates solely to a marketing function employee's specific request for transmission service.*
- c) *Voluntary consent provision. A transmission customer may voluntarily consent, in writing, to allow the transmission provider to disclose the transmission customer's non-public information to the transmission provider's marketing function employees. If the transmission customer authorizes the transmission provider to disclose its information to marketing function employees, the transmission provider must post notice on its Internet website of that consent along with a statement that it did not provide any preferences, either operation or rate-related, in exchange for that voluntary consent.*
- d) *Posting written procedures on the public Internet. A transmission provider must post on its Internet website current written procedures implementing the standards of conduct.*
- e) *Identification of affiliate information on the public Internet.*
  - (1) *A transmission provider must post on its Internet website the names and addresses of all its affiliates that employ or retain marketing function employees.*

- (2) *A transmission provider must post on its Internet website a complete list of the employee-staffed facilities shared by any of the transmission provider's transmission function employees and marketing function employees. The list must include the types of facilities shared and the addresses of the facilities.*
  - (3) *The transmission provider must post information concerning potential merger partners as affiliates that may employ or retain marketing function employees, within seven days after the potential merger is announced.*
- f) *Identification of employee information on the public Internet.*
- (1) *A transmission provider must post on its Internet website the job titles and job descriptions of its transmission function employees.*
  - (2) *A transmission provider must post a notice on its Internet website of any transfer of a transmission function employee to a position as a marketing function employee, or any transfer of a marketing function employee to a position as a transmission function employee. The information posted under this section must remain on its Internet website for 90 days. No such job transfer may be used as a means to circumvent any provision of this part. The information posted must include.*
    - i. *The name of the transferring employee,*
    - ii. *The respective titles held while performing each function (i.e., as a transmission function employee and as a marketing function employee), and*
    - iii. *The effective date of the transfer.*
- g) *Timing and general requirements of postings on the public Internet.*
- (1) *A transmission provider must update on its Internet website the information required by this part 358 within seven business days of any change, and post the date on which the information was updated. A public utility may also post the information required to be posted under part 358 on its OASIS, but is not required to do so.*
  - (2) *In the event an emergency, such as an earthquake, flood, fire or hurricane, severely disrupts a transmission provider's normal business operations, the posting requirements in this part may be suspended by the transmission provider. If the disruption lasts longer than one month, the transmission provider must so notify the Commission and may seek a further exemption from the posting requirements.*
  - (3) *All Internet website postings required by this part must be sufficiently prominent as to be readily accessible.*
- h) *Exclusion for recordation of certain information exchanges.*
- (1) *Notwithstanding the requirements of §§ 358.5(a) and 358.6, a transmission provider's transmission function employees and marketing function employees may exchange certain non-public transmission function information, as delineated in § 358.7(h)(2), in which case the transmission provider must make and retain a contemporaneous record of all such exchanges except in emergency circumstances, in which case a*

*record must be made of the exchange as soon as practicable after the fact. The transmission provider shall make the record available to the commission upon request. The record may consist of hand-written or typed notes, electronic records such as e-mails and text messages, recorded telephone exchanges, and the like, and must be retained for a period of five years.*

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

- i. Information pertaining to compliance with Reliability Standards approved by the Commission, and*
- ii. Information necessary to maintain or restore operation of the transmission system or generating units, or that may affect the dispatch of generating units.*

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

## **PROCEDURES AND MECHANISMS FOR COMPLIANCE**

Specific transparency procedures include:

### **Disclosure**

Any non-public transmission function information improperly disclosed will be posted as required on SDG&E's Internet website, [SDG&E's FERC Standards of Conduct - Order 717 Postings](#). SDG&E's Internet website is readily accessible to the public and all information required to be posted pursuant to Order 717 are posted on this website.

### **Affiliate Information**

SDG&E has procedures in place to post the applicable affiliate information within the required timeframe on its Internet website:

- The names and addresses of all its affiliates that employ or retain Marketing Function Employees.
- A complete list of the employee-staffed facilities shared by any of SDG&E's Transmission Function Employees and Marketing Function Employees. Including the types of facilities shared and the addresses of those facilities.

- Information concerning potential merger partners as affiliates that may employ or retain Marketing Function Employees. This data will be posted on the website within seven days after the potential merger is announced, in accordance with the rules.

### **Employee Information**

SDG&E has mechanisms in place to post the necessary employee information within the required time frame on its Internet website:

- Job titles and job descriptions of its Transmission Function Employees.
- Transfers of a Transmission Function Employee to a position as a Marketing Function Employee.
- Transfers of a Marketing Function Employee to a position as a Transmission Function Employee.
- The name of the transferring employee.
- The respective titles held while performing each function (i.e., as a Transmission Function Employee and as a Marketing Function Employee).
- The effective date of the transfer.

Information related to employee transfers remains on the website for 90 days as required.

### **Information Exchange**

SDG&E has procedures to prevent the flow of non-public transmission function information to Marketing Function Employees within the company and its subsidiaries. In the event of an inadvertent disclosure or an emergency exception, employees are trained to notify the relevant personnel as soon as possible, so a determination can be made on the appropriate course of action such as an Internet posting. Records are maintained in accordance with Sempra's record retention schedule.

### **Waivers**

SDG&E will post on its Internet website notice of each waiver of a tariff provision that it grants in favor of an affiliate, unless such waiver has been approved by the Commission. SDG&E is not able to grant waivers of its tariff provisions to affiliates, since, pursuant to the Transmission Control Agreement with CAISO, the CAISO has been granted operational control over SDG&E's transmission lines and associated facilities.

## **H. § 358.8 Implementation requirements**

### *(a) Effective date.*

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

### *(b) Compliance measures and written procedures.*

- (1) A transmission provider must implement measures to ensure that the requirements of §§358.5 and 358.6 are observed by its employees and by the employees of its affiliates.*
- (2) A transmission provider must distribute the written procedures referred to in §358.7(d) to all its transmission function employees, marketing function employees, officers, directors, supervisory employees, and any other employees likely to become privy to transmission function information.*

### *(c) Training and compliance personnel.*

- (1) A transmission provider must provide annual training on the standards of conduct to all the employees listed in paragraph (b)(2) of this section. The transmission provider must provide training on the standards of conduct to new employees in the categories listed in paragraph (b)(2) of this section, within the first 30 days of their employment. The transmission provider must require each employee who has taken the training to certify electronically or in writing that s/he has completed the training.*
- (2) A transmission provider must designate a chief compliance officer who will be responsible for standards of conduct compliance. The transmission provider must post the name of the chief compliance officer and provide his or her contact information on its Internet website.*

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

## **PROCEDURES AND MECHANISMS FOR COMPLIANCE**

### **Written Procedures**

SDG&E distributes the Compliance Plan to all its Transmission Function Employees, Marketing Function Employees, officers, directors, supervisory employees, and any other employees likely to become privy to transmission function information. SDG&E also maintains its Compliance Plan implementing FERC Order 717 on its internal website as well as its internet website at [SDG&E's FERC Standards of Conduct - Order 717 Postings](#), which is accessible to all

employees and to the public. This document is reviewed periodically to reflect updates to the related SDG&E compliance procedures.

### **Training**

As described earlier in these procedures, SDG&E provides a comprehensive education and training program as a primary means for ensuring compliance with Order 717. This training, which includes knowledge testing, is administered to employees and agents, consultants and contractors likely to be privy to non-public transmission function information. The web-based training is a broad examination of Order 717's requirements. Personnel receive certification after they have successfully completed the training. Records are stored in the Learning Management System and Contractor Training System which are utilized to deploy these web-based trainings. An anti-conduit attestation is a required element of the training. Order 717 training is completed on an annual basis for applicable personnel and within the required 30 days for applicable, newly hired personnel.

### **Chief Compliance Officer**

SDG&E's current CCO is Michael Schneider. His contact information is as follows:

**San Diego Gas & Electric Company:**  
Michael Schneider  
VP, Risk Management & Chief Compliance Officer  
8315 Century Park Court  
San Diego, CA 92123

### **Books and Records**

SDG&E maintains separate books of account and records, as detailed in Order 717, separately from those of affiliates that employ or retain Marketing Function Employees.