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1. PURPOSE / SCOPE

- 1.1. This procedure governs the activities related to PPL Electric Utilities Corporation (PPL EU) obligations under Federal Energy Regulatory Commission (FERC), Standards of Conduct regulations, published in 18 CFR Part 358.
- 1.2. FERC Standards of Conduct regulations (18 CFR Part 358) impose obligations on PPL EU, its affiliates and all employees, contractors, and consultants thereof. This procedure explains the regulations and achievement of compliance related to the protection of non-public PPL EU Transmission Function Information (TFI).
- 1.3. Each general principle of the FERC Standards of Conduct is explained in a dedicated section of this document. The four principals are:
 - 1.3.1. Non-Discrimination
 - 1.3.2. Independent Functioning Rule
 - 1.3.3. No Conduit Rule
 - 1.3.4. Transparency Rule
- 1.4. PPL EU is a subsidiary of PPL Corporation. PPL EU is a public utility that owns facilities used for the transmission of electric energy in interstate commerce. PPL EU is subject to the jurisdiction of the FERC, a governmental agency that regulates the interstate transmission of natural gas, oil, and electricity.
 - 1.4.1. PPL EU is a Transmission Provider and has a Transmission Function, including transmission service provided over lower voltage facilities (e.g., 12KV service).



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1.4.2. PPL EU has a limited Marketing Function due to its sales to PJM Interconnection, L.L.C. (“PJM”) of excess power purchased for Provider of Last Resort (“POLR”) customers. PPL EU currently has no Marketing Function Employees.

1.5. PPL EU affiliates include all subsidiaries of PPL Corporation, including but not limited to PPL Services Corporation, PPL EU Services Corporation, Louisville Gas and Electric Company, Kentucky Utilities Company, Electric Energy, Inc., LG&E and KU Energy Services Company, PPL TransLink, Inc, PPL Distributed Energy Resources (DER), LLC and The Narragansett Electric Company d/b/a Rhode Island Energy.

1.5.1. The PPL EU affiliates that engage in Marketing Functions are Louisville Gas and Electric Company, Kentucky Utilities Company, and Electric Energy, Inc.

2. ROLES & RESPONSIBILITIES

2.1. Corporate HR Operations

2.1.1. Maintain accuracy of automated HR reports, e.g., FERC Job Description Report.

2.2. Corporate Security

2.2.1. Establish controls to restrict physical access to non-public Transmission Function Information.

2.3. NERC & FERC Compliance (N&FC)

2.3.1. Accountable for compliance with the FERC requirements of 18 CFR Part 358 as outlined in this procedure.

2.3.2. Facilitates the determination of non-public disclosure of TFI with owner of information.

2.3.3. Develop and assign the FERC Standards of Conduct training.

2.3.4. Monitor automated completions of 30-day and annual FERC Standards of Conduct Training.

2.3.5. Verify FERC Standards of Conduct Training completion via the PPL Security Request System (SRS) workflow for access requests to TFI.

2.3.6. Review weekly HR Report (FERC Job Descriptions) for completeness and posting.

2.3.7. Assess and approve new and existing applications and SharePoint sites for Transmission Function Information.

2.3.8. Review websites (internal and external) for required postings.

2.3.9. Ensure designation of a Chief Compliance Officer responsible for FERC Standards of Conduct compliance.

2.4. IT Cyber Security



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- 2.4.1. Establish controls to restrict electronic access to non-public Transmission Function Information.
- 2.4.2. Maintain FERC TFI Applications List in ITEAM, SRS, IDM, and AIM applications.
- 2.4.3. Maintain list of individuals with access to FERC TFI for access review and training assignments.

2.5. Communications

- 2.5.1. Post required website postings to the company external website.

2.6. Office of General Counsel (OGC)

- 2.6.1. Provide legal advice to PPL EU and PPL EU affiliates related to FERC matters, including Standards of Conduct.
- 2.6.2. Notify PPL EU of changes to the FERC Standards of Conduct regulations, implementation, or enforcement.

2.7. Transmission Operations

- 2.7.1. Post notice on PJM Oasis of non-public Transmission Function Information disclosed inappropriately.

2.8. Requestor of New Application or Existing Application Changes

- 2.8.1. Complete TFI application.
- 2.8.2. Review TFI application with N&FC group for assessment.
- 2.8.3. Sign approved TFI application.

3. APPLICABILITY

- 3.1. Except as otherwise specified in this section 3, this procedure applies to all PPL EU employees, affiliates and contractors performing business activities directly for, or in support of, PPL EU who have access to, or come into contact with, non-public PPL EU TFI.
 - 3.1.1. PPL EU shares joint assets with First Energy (Met-Ed). The PPL EU FERC Program is not applicable to First Energy (Met-Ed) personnel. First Energy has its own FERC Program and does not have access to PPL EU TFI.
- 3.2. Contractors who have physical-only access to non-Transmission and Substation facilities are exempt from FERC Standards of Conduct training.
- 3.3. For PPL EU affiliates (e.g., Rhode Island Energy and the PPL Kentucky companies) with a separate FERC Standards of Conduct training program, PPL EU accepts that training where the PPL affiliate employees and contractors are performing work on behalf of PPL EU.
- 3.4. For PPL EU affiliates (e.g., PPL Services) without their own FERC Standards of Conduct training program where employees and contractors may perform work on behalf of both PPL EU and another affiliate company with a separate FERC Standards of Conduct training program (e.g., the PPL Kentucky companies), PPL EU accepts that training for calendar year 2022.

- 3.5. For avoidance of doubt, former National Grid employees who become employees of PPL Corporation in 2022 and took National Grid FERC Standards of Conduct training are subject to this policy and must take PPL training if they have access to, or come into contact with, non-public PPL EU TFI.

4. TERMS AND DEFINITIONS

- 4.1. Refer to PPL EU program EU-NERC-PGM-DEFINITIONS.
- 4.2. Refer to NERC Glossary of Terms – web address (<https://www.nerc.com/Pages/default.aspx>)
- 4.3. Marketing Functions – the sale or 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. Bundled retail sales, including sales of electric energy made by providers of last resort (POLRs) acting in their POLR capacity are not marketing functions.
- 4.4. Marketing Function Employee – an employee, contractor, consultant or agent of a Transmission Provider or an affiliate of a Transmission Provider who actively and personally engages on a day-to-day basis in Marketing Functions.
- 4.5. Non-public Transmission Function Information – Transmission Function Information not publicly available.
- 4.6. OASIS – Open Access Same-Time Information System – provides information by electronic means about available transmission capability for point-to-point service and a process for requesting transmission service on a non-discriminatory basis. OASIS enables transmission providers and transmission customers to communicate requests and responses to buy and sell available transmission capacity offered in the PJM Open Access Transmission Tariff.
- 4.7. PJM Open Access Transmission Tariff (OATT) - The tariff is the overall document that governs the operations of PJM. It includes the provisions governing transmission service within the PJM region. The tariff and revisions to it and the other governing documents are subject to acceptance by the Federal Energy Regulatory Commission, the agency that regulates PJM and the other regional grid organizations.
- 4.8. Transmission Functions – The planning, directing, organizing, or carrying out of day-to-day transmission operations, including the granting, and denying of transmission service requests.
- 4.9. Transmission Function Employee – An employee, contractor, consultant, or agent of a Transmission Provider who actively and personally engages in Transmission Functions on a day-to-day basis.
- 4.10. Transmission Function Information (“TFI”) – Information that relates to the planning, directing, organizing, or carrying out of day-to-day transmission operations including, granting, and denying transmission service requests.
- 4.11. Transmission Provider – Any public utility that owns, operates, or controls facilities used for the transmission of electric energy in interstate commerce.

5. MAIN BODY

- 5.1. Non-Discrimination

- 5.1.1. PPL EU treats all transmission customers, affiliated and non-affiliated, on a not unduly discriminatory basis.
- 5.1.2. PPL EU processes all similar requests for transmission service in the same manner and within the same period.
- 5.1.3. No undue preference or advantage may be given to any person related to the sale or purchase of transmission service or wholesale sale of electric energy (including but not limited to price, curtailments, scheduling, priority, ancillary services, or balancing).
- 5.1.4. If permitted discretion, apply tariff (PJM OATT) provisions related to 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.
- 5.1.5. If not permitted discretion, all provisions related to the sale or purchase of open access transmission service will be strictly enforced.

5.2. Independent Functioning Rule

- 5.2.1. PPL EU Transmission Function Employees function independently from Marketing Function Employees.
 - 5.2.1.1. PPL EU has a Marketing Function but does not currently have any Marketing Function Employees.
 - 5.2.1.2. PPL EU affiliates that engage in Marketing Functions are Louisville Gas and Electric Company, Kentucky Utilities Company, Electric Energy, Inc., LG&E and KU Energy Services Company, and PPL TransLink Inc.,
- 5.2.2. Transmission Function Employees shall not engage in/perform Marketing Functions.
- 5.2.3. Marketing Function Employees shall not:
 - 5.2.3.1. Engage in/perform Transmission Functions; or
 - 5.2.3.2. Have or be granted access to the system control center or any facility used for transmission operations.
- 5.2.4. Exceptions to the independent functioning rule must be granted by a FERC order.

5.3. No Conduit Rule

- 5.3.1. Do not disclose or use anyone as a conduit to disclose non-public TFI to any Marketing Function Employee of PPL EU or any affiliate.
- 5.3.2. PPL EU employees, contractors, consultants, or agents and those of its affiliates are prohibited from acting as a conduit to disclose non-public TFI to any Marketing Functioning Employee of PPL EU or its affiliates.

5.4. Implementing the No Conduit Rule:

- 5.4.1. The NERC & FERC Compliance group assesses new and existing applications for TFI. Refer to Attachment 4 and 5.
- 5.4.2. Corporate Security (CS) develops and implements appropriate controls for physical access to FERC TFI.

5.4.2.1. Card readers and other security measures restrict access to Transmission Control Centers, locations with Transmission Function Employees, and locations with Transmission Function Information.

5.4.2.2. Work locations include:

- 5.4.2.2.1. Primary Transmission Control Center
- 5.4.2.2.2. Backup Transmission Control Center
- 5.4.2.2.3. Primary Distribution Operations Center
- 5.4.2.2.4. Secondary Distribution Operations Center
- 5.4.2.2.5. General Office North Building floors N2, N3, N4 and N5
- 5.4.2.2.6. Lehigh Service Center

5.4.3. Information Technology (IT) Cyber Security maintains the FERC TFI Applications List (ITEAM flagged applications). See EU-NERC-CIP-040 PPL EU Access Control and Management procedure for details.

5.4.3.1. IT Security flags the application that grants access to FERC TFI data in a FERC TFI Application in Account Information Management (AIM).

5.4.4. IT Cyber Security develops and implements appropriate controls for electronic access to FERC TFI.

5.4.4.1. Access to TFI Applications is granted via SRS requests.

5.4.4.2. The SRS request process requires completion of FERC Standards of Conduct Training prior to approval for Applications.

5.5. Transparency Rule

5.5.1. All affiliated and non-affiliated transmission customers shall have equal access to non-public TFI that is disclosed to a Marketing Function Employee.

5.5.2. Protocol for contemporaneous disclosure of non-public TFI

5.5.2.1. Upon notification or discovery, owner of information, N&FC and OGC, and if needed PJM determines if non-public Transmission Function Information has been disclosed to a Marketing Function Employee of PPL EU or any PPL EU affiliate or PPL Distributed Energy Resources (DER), LLC.

5.5.2.2. PJM and/or N&FC group notifies PPL EU Transmission Operations to immediately post the non-public TFI that was disclosed on PJM Oasis.

5.5.2.3. With respect to TFI, if one of the following types of information is disclosed, PPL EU Transmission Operations immediately posts notice of the disclosure on PJM Oasis: (but not the information itself).

- Non-public customer information
- Critical Energy Infrastructure Information (CEII)
- Information determined to be subject to limited dissemination by FERC

5.5.2.4. Exclusions for Transaction Information:

- A PPL EU Transmission Function Employee is permitted to discuss with a Marketing Function Employee information related solely to a specific request for transmission service submitted by the Marketing Function Employee. Contemporaneous disclosure is not required in this instance.

5.5.2.5. Exclusions for voluntary consent provision:

- A transmission customer may voluntarily consent, in writing, to allow PPL EU to disclose the transmission customer's non-public information to Marketing Function Employees.
- If the transmission customer authorizes PPL EU to disclose its information, PPL EU must post notice of the consent and a statement that it did not provide any preferences, operational or rate-related, in exchange for the voluntary consent on its internet website within seven business days.

5.5.2.6. Exclusions for and recordation of certain information exchanges:

5.5.2.6.1. The non-public TFI listed below may be exchanged between Transmission Function Employees and Marketing Function Employees

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

5.5.2.6.2. When the non-public TFI listed above is exchanged between a Transmission Function Employee and a Marketing Function Employee or Distributed Energy Resources (DER) Aggregators, PPL EU shall, at the same time, make and retain a record of the exchange and make it available to FERC upon request. The record must be retained for a period of five years and may consist of:

- Hand-written or typed notes,
- Electronic records, such as emails and text messages,
- Recorded telephone exchanges,
- Any other documentation related to the exchange.

5.6. Required Website Postings

5.6.1. PPL Communication posts on PPL company's website the following as identified and requested by PPL OGC and N&FC.

- Name and contact information of the PPL EU Chief Compliance Officer who is responsible for Standards of Conduct compliance. PPL EU's designated Chief Compliance Officer is the President of PPL Electric Utilities.

- This procedure and any other written procedures implementing the FERC Standards of Conduct. Any change to a written procedure requires reposting within seven business days.
- List of all PPL EU affiliates that employ or retain Marketing Function Employees. The list shall include names and addresses.
- List of employee-staffed facilities shared by any Transmission Function Employee(s) and Marketing Function Employee(s). The list shall include the type of facility shared and address.
- Information regarding potential merger partners as affiliates that may employ or retain Marketing Function Employees.
- Job titles and job descriptions of PPL EU Transmission Function Employees.
- Any transfer of a Transmission Function Employee to a position as a Marketing Function Employee. The posting must remain for 90 days and include name of transferring employee, titles held while performing each function, and effective date of transfer.
- Any transfer of a Marketing Function Employee to a position as a Transmission Function Employee. The posting must remain for 90 days and include name of transferring employee, titles held while performing each function, and effective date of transfer.
- Notice of each waiver of a tariff provision that favors an affiliate unless the waiver is approved by FERC. Waiver must be posted within one business day of the grant/application of a waiver. PPL EU retains a log of the acts of waiver for five years from the date of each waiver.

5.6.2. All required website postings are made within seven days unless otherwise noted.

5.6.3. Each website posting includes the date the information was most recently updated.

5.6.4. All website postings are sufficiently prominent and readily accessible.

5.6.5. In the event of an emergency, such as an earthquake, flood, fire, or hurricane, that severely disrupts normal business operations; the posting requirements may be suspended. If the disruption lasts longer than one month, PPL EU notifies FERC and seeks further exemption from the posting requirements.

5.6.6. PPL EU does not currently have any employee-staffed facility that is shared by Transmission Function Employees and Marketing Function Employees.

5.6.7. N&FC reviews the posting of Job titles and job descriptions of PPL EU Transmission Function Employees. Refer to Attachment 3.

5.6.8. N&FC reviews website (internal and external) postings annually to ensure postings are accurate and current.

5.7. Distribution of Written Procedures

5.7.1. N&FC posts EU-FERC-100 procedure with reference to the transparency rule for all Transmission Function Employees, Marketing Function Employees, officers,

directors, supervisory employees, and any other employees likely to become privy to TFI.

5.8. FERC Standards of Conduct Training (FERC SoC Training)

5.8.1. PPL EU ensures that the general principles of the FERC Standards of Conduct requirements are communicated to employees and employees of its affiliates via completion of the FERC SoC Training.

5.8.2. FERC SoC Training is required as follows:

- Within the first 30 days of employment for employees, and within 30 days of PPLNet Account activation for contractors.

Automated preventive control deactivates account if training is not completed by day 26, and individuals will need to complete the training to re-instate the account. Refer to attachment 8.

- Annually for existing employees and contractors with active PPLNet Account.

Automated preventive control deactivates account if training is not completed by day 360, and individuals will need to complete the training to re-instate the account. Refer to attachment 8.

- Employees and contractors that are considered privy to transmission function information are required to maintain current training.

5.8.3. The FERC SoC Training is developed and updated, as needed, by the N&FC Group.

5.8.4. The required training for FERC SoC is provided via PPL Computer Based Course (CBT) titled FERC Standard of Conduct Training.

5.8.5. All employees and contractors with a PPLNet account are automatically assigned the FERC SoC training. Refer to Attachment 1.

5.8.6. Each employee or contractor electronically or in writing certifies that training has been completed.

- FERC SoC training is continuously being monitored by automated controls through the Human Capital Management (HCM) and Learning Management System (LMS) by tracking due dates and sending reminders to trainees. Additionally, if a training is nearing the due date, the user receives a warning and access is temporarily restricted to only the training module. If the due date passes, then the user loses access.
- It is recommended that employees complete their annual FERC SoC training prior to going on leave, LTD, or other reasons to ensure continuity of PPLNet account access.
- In the case of failure to complete 30 Day (new accounts) and annual FERC SOC training, if the training passes the due date, it is overdue. This results in placement of the user into the penalty box (user can only access training).

5.8.7. In accordance with good utility practice, applicability of the FERC Standards of Conduct Training does not include job functions related to storm restoration or

performed by personnel from an unaffiliated utility company, unless otherwise specified, refer to Section 3 - Applicability.

5.8.8. Contractors (Foreign Utility Worker, facility workers) with physical access to substation gates and/or fences, regional facilities are not assigned FERC Standards of Conduct.

5.8.8.1. Quarterly review of contractors with physical access to non-NERC facilities or PSP is not required as a detective control.

5.9. Addressing Potential Compliance Conditions

5.9.1. At any time, an individual may identify a potential compliance issue.

5.9.2. Upon identification, an employee or contractor reports the potential compliance condition to NERC & FERC Compliance Group.

5.9.2.1. PPL EU expects all potential compliance conditions to be reported to NERC & FERC Compliance Group upon identification, i.e., without delay for determination of potential non-compliance.

5.9.3. After NERC & FERC Compliance receives notification, the process for documenting and reviewing the compliance issue, the same as documented in EU-NERC-100 Section 5.6, is applied.

5.9.4. Use Attachment 9 to document the CCR for FERC related Compliance Analysis.

5.9.4.1. Completed FERC related CCRs are retained as records.

6. REFERENCES

6.1. 18 CFR Part 358, Standards of Conduct

6.2. Corporate Policy 407 (CP-407), Records Management

6.3. FERC Order 717, Standards of Conduct for Transmission Providers, October 16, 2008 (Docket No. RM 07-1-000)

6.4. FERC Order 717-A, Standards of Conduct for Transmission Providers, October 15, 2009. (Docket No. RM07-1-001)

6.5. PPL Electric Utilities Corporation, 157 FERC ¶ 61,028 (2016) (denying Confirmation of Exemption) (Docket No. TS16-2-000)

6.6. FERC Standard of Conduct (SOC) Training Job Aid – Attachment 3

7. REGULATORY REQUIREMENTS

7.1. This procedure complies with and supports the PPL EU FERC Compliance Program and is facilitated by the NERC & FERC Compliance Group.

8. TRAINING

8.1. Updates are distributed via email distribution list, posted on NERC & FERC Compliance SharePoint site and/or announced at NERC & FERC compliance meetings.

9. COMPLIANCE AND EXCEPTIONS

- 9.1. All PPL EU employees and contractors are expected to fully comply with this procedure.
- 9.2. Exceptions to this procedure need written approval in advance from PPL EU VP Transmission & Substations or CIP Senior Manager.
- 9.3. Report any concerns with adherence to this procedure to a member of the NERC & FERC Compliance Group.

10. ATTACHMENTS

- 10.1. Attachment 1 – FERC Standards of Conduct Applicability Matrix
- 10.2. Attachment 2 – Obsolete
- 10.3. Attachment 3 - FERC Standard of Conduct (SOC) Training Job aid
- 10.4. Attachment 4 – Identification & Notification of TFI
- 10.5. Attachment 5 – Application Assessment for TFI
- 10.6. Attachment 6 – Obsolete
- 10.7. Attachment 7 – Obsolete
- 10.8. Attachment 8 – Obsolete
- 10.9. Attachment 9 - PPL EU FERC Compliance Condition Report (CCR) Template

11. RECORD RETENTION

- 11.1. Record retention is consistent with the PPL Corporation Records Management Retention Schedule.
- 11.2. PPL EU maintains its books of accounts and records (as prescribed under parts 101, 125, 201 and 225 of Title 18 of the Code of Federal Regulations) separately from those of its affiliates that employ or retain marketing function employees.
 - 11.2.1. Books of accounts and records shall be available for FERC inspections.
- 11.3. NERC & FERC Compliance Group reviews this procedure annually.
- 11.4. Records supporting this procedure include:
 - 11.4.1. FERC Standards of Conduct Training Report
 - 11.4.2. Training Assignment & Completion Records
 - 11.4.3. FERC TFI Application Report
 - 11.4.4. Review of TFI Access
 - 11.4.5. Website Posting Reports
 - 11.4.6. Compliance Condition Report
- 11.5. Any records subject to litigation hold must be retained until instructed otherwise.



12. PROCESS CONTROLS

- 12.1. Annual Review of website postings – preventive control.
- 12.2. Annual Training reports – detective control.
- 12.3. Automated reminders of training due dates and limiting access to training only – preventive control.
- 12.4. Automated reports from Human Capital Management (HCM) system – detective control.
- 12.5. Automated monitoring and removal of access when training dated expire – preventive control.
- 12.6. Automated monthly report to identify inconsistency of TFI flags across ITEAM, SRS, AIM or IDM – preventive control.
- 12.7. Automatic training assignments and notifications – preventive control.
- 12.8. Implementation of FERC process refer to GP 719 – preventive control.
- 12.9. Attachment 3 - FERC Standard of Conduct (SOC) Training Job Aid – preventive control.

13. REVISION HISTORY

| | |
|---------------------|--|
| Prepared by: | <u>Brian Wynn</u> <small>Brian Wynn (Nov 2, 2023 09:21 EDT)</small> |
| | Brian Wynn Sr Specialist – NERC & FERC Compliance |
| Reviewed by: | <u>Michelle Longo</u> <small>Michelle Longo (Nov 2, 2023 09:32 EDT)</small> |
| | Michelle Longo Manager - NERC & FERC Compliance |
| Approved by: | <u>David Quier</u> <small>David Quier (Nov 2, 2023 14:01 EDT)</small> |
| | David A. Quier VP – Transmission & Substations |

| Revision | Date | Revision Comments |
|----------|------------|-------------------------------------|
| 0 | 12/31/2015 | Initial Release. |
| 1 | 2/26/2016 | Corrected Assigned Procedure Number |



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|---|------------|---|
| 2 | 6/15/2017 | <ol style="list-style-type: none"> 1. Annual review of complete procedure. 2. Section 2 - Revised Roles and Responsibilities for EU Compliance, IT Security Compliance, OGC and HR. Added IT Strategy & Business Services and Transmission Operations. 3. Attachment 1, 2, 3, 4 and 5 – Added. 4. Errata Changes throughout procedure. |
| 3 | 12/31/2017 | <ol style="list-style-type: none"> 1. Annual review of complete procedure. 2. Transitioned some responsibilities from OGC to EU Compliance. 3. Section 5.4.5 – Updated FERC SoC assignment. 4. Attachment 1 – Updated applicability 5. Attachment 2 – Obsoleted 6. Attachment 3 – Update contact information 7. Attachment 6 and 7 - Added |
| 4 | 3/15/2018 | <ol style="list-style-type: none"> 1. Annual review of complete procedure. 2. Change EU Compliance group to Reliability Assurance group throughout procedure. 3. Section 5.4 – Added 30-day monitoring report. 4. Attachment 1 – Clarified actions taken. 5. Attachment 5, 6 and 7 - Updated |
| 5 | 4/15/2018 | <ol style="list-style-type: none"> 1. Section 5.3.5 – Added clarification. 2. Section 12 – Added control. 3. Attachment 7 – Updated. 4. Attachment 8 – Added. |
| 6 | 2/15/2019 | <ol style="list-style-type: none"> 1. Annual review of entire procedure. 2. Section 2 – Removed requirement for annual certification and approval of 3. Section 5 – Updated with PJM and FERC Regulatory group actions. 4. TFI application. 5. Section 6 - Removed reference to EU-FERC-900 as procedure is obsoleted. 6. Updated Attachment 7 - additional fields in SRS Exception Request. 7. Attachment 8 - Obsoleted |
| 7 | 10/31/2020 | <ol style="list-style-type: none"> 1. Annual review of procedure during 2020 Procedure Summit. 2. Errata changes. 3. Updated throughout – Reliability Assurance changed to NERC & FERC Compliance. 4. Section 2 – Updated Roles and Responsibilities. 5. Section 6.9 - Addressing Potential Compliance Conditions. 6. Updated – Attachment 1, 3, 6, 7 and 8. 7. Attachment 9 – PPL EU FERC Compliance Condition Report (CCR) Template – Added. |



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| 8 | 4/14/2021 | <ol style="list-style-type: none">1. Updated section 5.8 to add clarity regarding FERC SoC training requirements.2. Updated Attachments 1, 6, 7, and 8 to add clarity regarding FERC SoC training requirements. |
| 9 | 8/31/2021 | <ol style="list-style-type: none">1. Sections 1.5 and 5 – added PPL Distributed Energy Resources (DER), LLC. |
| 10 | 11/5/2021 | <ol style="list-style-type: none">1. Annual review of entire procedure during 2021 Procedure Summit.2. Updated Attachment 8 for increased accuracy. |
| 11 | 3/1/2022 | <ol style="list-style-type: none">1. Update throughout – PPL affiliate to include and PPL Services (on behalf of Rhode Island Energy).2. Section 5.8 – Updated with automated monitoring of training and applicability of FERC SOC training.3. Attachment 1 – Updated RC for Transmission Function Employees.4. Attachment 6 and 7 – obsoleted. |
| 12 | 11/30/2022 | <ol style="list-style-type: none">1. Annual review of entire procedure during 2022 Procedure Summit.2. Section 1.5 – Added Rhode Island Energy and removed Safari LLC3. Section 5.8.6 – Updated with detail on restricting access for users where training due dates are approaching.4. Errata changes throughout. |
| 13 | 05/15/2023 | <ol style="list-style-type: none">1. Annual review of entire procedure.2. Section 3 – Updated with Contractors who have physical-only access.3. Section 5.8.8 – Updated with Contractors with physical access.4. Sections 6 and 12 – Updated with job aid reference.5. Attachment 3 – Updated.6. Attachment 8 – Obsoleted due to automated controls.7. Errata changes throughout. |
| 14 | 11/30/2023 | <ol style="list-style-type: none">1. Removed reference to MRC.2. Errata changes throughout. |



ATTACHMENT 1 – FERC STANDARDS OF CONDUCT APPLICABILITY MATRIX

| FERC 358.8 - Implementation Requirements | FERC Definition | Requirements - Monitored by NERC & FERC Compliance | PPL Implementation | Action Taken if Requirements not Met |
|---|---|--|---|---|
| A. Transmission Function Employee | Employee, contractor, consultant or agent of a transmission provider who actively and personally engages on a day-to-day basis in transmission functions | <ol style="list-style-type: none"> 1. Complete FERC Standards of Conduct Training annually and within the first 30 days of employment for employees/ within 30 days of PPLNet Account activation for contractors. 2. Post Job Titles and Job Descriptions. Changes posted within 7 days. 3. Post any job transfer of a TFE to an MFE or MFE to TFE. Post within 7 days. | <u>Employees and Contractors in:</u> RC 1590 - TOps RC 481 - DOps RC 482 – DOps RC 1574 - DOps *Note: DOps is considered a TFE because some Distribution lines are considered Transmission lines under FERC regulations and DOps operates these lines via TMS. | Access is revoked. |
| B. Marketing Function Employee | 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 | <ol style="list-style-type: none"> 1. Complete FERC Standards of Conduct Training annually and within the first 30 days of employment for employees/ within 30 days of PPLNet Account activation for contractors. 2. Post any job transfer of a TFE to an MFE or MFE to TFE. Post within 7 days. | None in PPL EU PPL Services *PPL Services will have Marketing Function employees working on behalf of the RI Company. | N/A |



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| FERC 358.8 - Implementation Requirements | FERC Definition | Requirements - Monitored by NERC & FERC Compliance | PPL Implementation | Action Taken if Requirements not Met |
|--|------------------------|--|---|---|
| C. Officers, Directors, Supervisory Employees | None | 1. Complete FERC Standards of Conduct Training annually and within the first 30 days of employment for employees/ within 30 days of PPLNet Account activation for contractors. | <u>PPL EU:</u> - Officers = Set List - Directors = Salary Grade 12 and above - Supervisor = Supervisors in TFE RCs | Access is revoked. |
| D. Employees Likely to Become Privy to TFI | None | 1. Complete FERC Standards of Conduct Training annually and within the first 30 days of employment for employees/ within 30 days of PPLNet Account activation for contractors. | <u>Employee or Contractor with access to:</u> - TFI Applications with TFI Role - Physical Access to Primary or Backup Ops Centers | Access is revoked. |
| E. Employees Likely to Become Privy to TFI | None | 1. Complete FERC Standards of Conduct Training annually and within the first 30 days of employment for employees/ within 30 days of PPLNet Account activation for contractors. | Employees and Contractors in PPL EU, PPL EU Services, PPL Services and TransLink | Access is revoked. |



ATTACHMENT 3 – FERC STANDARD OF CONDUCT (SOC) TRAINING JOB AID

Purpose

This document describes the steps for filling email evidence for FERC standards of Conduct (SOC) that meets the requirements detailed in PPL EU FERC Standards of Conduct Implementation, EU-FERC-100 procedure.

Process

- **FERC Training Report – Required 30-day training for employment for employees, and within 30 days of PPLNet Account activation for contractors**

- Email will be sent daily with the subject FERC Training Report (do not include weekends for this task)
- Click on email and drag it into the 30 Day monitoring folder for the current year
<\\ppl.com\PPLCorp\BusData\Electric Utilities\TRANSMISSION\Compliance\FERC\SoC Training\30 Day Monitoring\2023>
- Right click on the file and rename it PPERB73K - FERC 30 Day Monitoring YYYY MM DD (i.e., PPERB73K - FERC 30 Day Monitoring 2023 04 18)
- Once completed, file the original email in an email folder.

➤ **If discrepancies are identified in FERC training report, follow the below steps**

- Names that are past the 30-day time frame must be checked to see if they have FERC access, if they do this must be corrected ASAP.
- In Teams select the Employee Data tab
- Click on a line item to get the filter tab activated, under Employee ID enter the Employees ID whose name is still on the report past the 30-day time frame. Hit search.
- The employee’s information will be displayed, under where it says FERC Qualified it must state N for no. Which means they are not FERC qualified.

| Employee Operator ID | Employee ID | Active/Inactive | Employee Name | Job Title | Company | FERC Qualified | NERC Qualified | Supervisor ID | Supervisor Name | Record Last Updated |
|----------------------|-------------|-----------------|---------------|-----------|---------|----------------|----------------|---------------|-----------------|---------------------|
| | | Active | | | | N | N | | | |

- If it would state Y under FERC qualified, you must inform NFC Manager as this could be a PNC.
- **Job Description Email – Required every 7 days**
- Email will be sent on Monday (7th day) with the subject PPERA90D – FERC Job Descrs
- Open attachment and look through document to ensure there is a job description listed for each job title.
If a job title is missing a job description alert the NFC Manager.



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- Once you confirm each job title has a job description, drag the email into the TFE Job Description folder for the current year. <\\ppl.com\PPLCorp\BusData\Electric Utilities\TRANSMISSION\Compliance\FERC\TFE Job Descriptions\2023>
- Right click on the file and rename it as ferc_job_desc-MMDDYYYY (i.e., ferc_job_desc-04172023)
- An email confirmation from Communications is received once the document has been posted to the website, take the confirmation email and drag it to Posting Confirmations folder for the current year. <\\ppl.com\PPLCorp\BusData\Electric Utilities\TRANSMISSION\Compliance\FERC\TFE Job Descriptions\Posting Confirmations\2023>
- Right click on the file and rename it as RE_PP ERA90D-Jobcode Descrs - PPLEU FERC YYYY MM DD PPL (i.e., RE_PP ERA90D-Jobcode Descrs - PPLEU FERC 2023 04 17 PPL)
- Once completed, file the original email in an email folder.

ATTACHMENT 4 – IDENTIFICATION & NOTIFICATION OF TFI

Purpose

This document describes the responsibilities and required actions as it relates to identifying and monitoring Transmission Function Information (TFI) and responding to inadvertent disclosure of non-public Transmission Function Information (TFI).

Applicability

This job aid is intended for use by Subject Matter Experts (SME), Business Managers and Business Owners.

Triggering Event

Developing a new application or upgrading an existing application, which could contain non-public Transmission Function Information (TFI).

- Review PPL EU Job Aids on NERC & FERC Compliance SharePoint site for FERC requirements. Complete FERC Application Assessment Form. (Business Owner)
- Schedule meeting with PPL EU N&FC Group to review and complete the assessment. (Business Owner)
- Provide the PPL EU Application Assessment form to IT Cybersecurity when completing IT Form 5059 for new applications. (Business Owner)

Triggering Event

Identifying potential non-public TFI shared with individuals that have not completed PPL's FERC Standards of Conduct training or a marketing function employee (internal or external).

- Refer to the Transmission Function Information – refer to FAQs on NERC & FERC Compliance SharePoint site and section 5.5 for additional clarification on Transmission Function Information.
- Take an electronic screenshot to capture the original information that is suspected to be TFI. Save the image to a word document and contact NERC & FERC Compliance to send file (EUFERCCompliance@pplweb.com).
- If you are the data owner, remove the entire posting or change the suspected text sufficiently enough such that TFI is no longer part of the posting.

Note: NERC & FERC Compliance and PJM and FERC Regulatory Group will assess the information, working with OGC, to determine whether the information was TFI and take the appropriate next actions.



ATTACHMENT 5 – APPLICATION ASSESSMENT FOR TFI

Purpose

This document describes the steps to assess an application for adherence to Federal Energy Regulatory Commission (FERC) Standards of Conduct regarding protection of Transmission Function Information (TFI).

The Business Owner shall complete this TFI Application Assessment Form and schedule a meeting with NERC & FERC Compliance to conduct the review and compliance determination.

Application Information

Application Name/Code: _____
(From the CMDB System of Record)

Business Owner: _____

Is application data
obtained from another
PPL source? Yes No

If yes, what is Data
Source(s) Application
Name(s)/Code(s): _____
(From the CMDB System of Record)

Description and
Intended Business Use
of Application: _____

Potential Users: _____
(List of RCs, groups, etc.)



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Conclusion

- Application ***contains*** TFI.
FERC Standards of Conduct ***apply*** to the required security model. Other regulatory security requirements may also apply.

- Application ***does not contain*** TFI.
FERC Standards of Conduct ***do not apply*** to the required security model. Other regulatory security requirements may apply.

Reason: _____

Signatures

Business Owner: _____
Typed Name Here / Above Reserved for Adobe Sign
Job Title

Reviewed By: _____
Typed Name Here
Sr. Compliance Specialist – NERC & FERC Compliance

Approved By: _____
Typed Name Here
Manager – NERC & FERC Compliance

Assessment Date: _____

Upon completion of this form:

1. NERC & FERC Compliance routes the completed form for signatures.
2. NERC & FERC Compliance sends the signed form to the submitter.
3. The submitter sends to IT Cybersecurity and ensures the appropriate compliance flags are set in the CMDB system of record.



ATTACHMENT 8 – REINSTATEMENT OF PPLNET ACCOUNTS

Applicability

This job aid is for instruction to reinstate revoked PPLNet Accounts in the case of account being disabled due to FERC Standards of Conduct (SoC) Training not being completed timely.

Triggering Event

An employee or contractor who has failed to complete their training by the due date must complete the following to have PPLNet account restored.

- Employee or contractor who has had their PPLNet account disabled because of incomplete training must complete the FERC SOC training. To do so, contact IT Help Desk 610 – 774 - 7777 .



ATTACHMENT 9 – PPL EU FERC COMPLIANCE CONDITION REPORT (CCR) TEMPLATE

| | |
|----------------------|--|
| CCR # | |
| CCR Title | |
| FERC Requirement | |
| Date Identified | |
| Identified By | |
| Condition Start Date | |
| Condition End Date | |

Event Details:

Extent of Condition:

Potential FERC Non-Compliance: Yes No If no, why not:

Cause and Contributing Factors:

1.

Active Human Performance: Yes No

Latent System Weakness: Yes No

Mitigation Activities to correct the nonconforming condition and prevent recurrence:

1. Xxxxx. Completed xx/xx/xxxx
2. Xxxxx. Target Completion xx/xx/xxxx

Event Analysis Lead Date
Name
Title

Reviewer Date
Name
NERC & FERC Compliance Specialist

Reviewer (Responsible for Corrective Action) Date
Name
Title

Approver (Director Responsible for Corrective Action) Date
Name
Title

Approver Date
Name
Manager – NERC & FERC Compliance











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Final Audit Report

2023-11-02

| | |
|-----------------|--|
| Created: | 2023-11-02 |
| By: | Brian Wynn (bwynn@pplweb.com) |
| Status: | Signed |
| Transaction ID: | CBJCHBCAABA7MsYD1dYSqhDrXG0Gkwkq3LoOfmWbWu |

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