

# **Oklahoma Municipal Power Authority**

## **Standards of Conduct Policy Statement**

### **Overview**

It is the policy of the Oklahoma Municipal Power Authority ("OMPA") to fully comply with the Standards of Conduct, as they apply to OMPA, as established under Order 717 issued by the Federal Energy Regulatory Commission ("FERC").

OMPA is a small entity that owns and operates a limited amount of transmission facilities within the Southwest Power Pool ("SPP") Regional Transmission Organization, and as such, enacts these policies to comply with the intent of FERC Order 717.

### **Definitions**

The following definitions come from FERC Order 717.

**Marketing functions** 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."

**Marketing function 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.

**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.

**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 requests for transmission service or for 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.

**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.

**Transmission function information** means information relating to transmission functions.

## **General Principles**

In Order 717, FERC outlined four basic principles regarding Standards of Conduct: 1) a nondiscrimination principle, 2) an independent functioning principle, 3) the no-conduit principle, and 4) an equal access to information principle.

## **OMPA Policy**

It is the intent of OMPA to adhere to the principles outlined by FERC in Order 717 as they would apply to OMPA. Given that OMPA owns very little transmission and is not a transmission provider under the SPP OATT, the application of this Order to OMPA is minimal.

Exhibit A outlines how OMPA will define employees in their role as a Transmission Function or Marketing Function employee. These employees are identified by title only.

The following is how OMPA will comply with the four basic principles of Order 717.

### **Nondiscriminatory Access**

OMPA has turned over the control of its transmission assets to SPP, and as such SPP can offer and sell service over the OMPA transmission system. OMPA shall treat all transmission customers, affiliated and non-affiliated, on a nondiscriminatory basis.

### **Transmission Function Employees**

OMPA has made the determination that it does not have employees that serve in this capacity.

### **Independent Function**

As OMPA has determined that it does not have employees serving as Transmission Function Employees, the sharing of information is not relevant. Any transmission function information provided to OMPA from 3rd parties should be considered to be in the public domain. In the event that a 3rd party provides information to a OMPA employee that is specifically identified as confidential, transmission function information, then that employee should not share with marketing function employees.

### **No-Conduit Principle**

With an organization the size of OMPA, there will be key management personnel who may have access to both Transmission Function Information and Marketing Function Information. It is the policy of OMPA that these key personnel shall not disclose non-public transmission function information to OMPA's Marketing Function employees.

## **Equal Access to Information**

OMPA is required to provide equal access to non-public transmission function information to all transmission customers, affiliated and non-affiliated, on a nondiscriminatory basis.

OMPA engineering employees shall provide this information to SPP to post on its OASIS, or on OMPA internet site for equal access by the public.

This does not apply to confidential customer information or Critical Infrastructure Protection (CIP) information that would jeopardize the reliability of the bulk electric system.

## **Training**

OMPA will conduct annual training with engineering employees, marketing function employees, and key management personnel regarding this policy and its application within OMPA.

It will be the responsibility of the departmental manager to provide training to all new employees hired into either the engineering department or marketing function affected classifications. This training shall be documented and copies sent to the OMPA HR department.

## **Public Disclosure**

OMPA will post the following information on its internet website.

1. A copy of this policy statement
2. A list of all affiliates that retain, or employ a marketing function
3. A list of employee-staff facilities shared by any transmission function and marketing function employees
4. The names of any employees, respective job functions, and effective date of any employees that transfer between the transmission function and marketing function positions.

## **EXHIBIT A**

### **LISTING OF IMPACTED POSITIONS**

#### Transmission Function Employees

None

#### Marketing Function Employees

Director of Operations

Operations Manager

Sr. Scheduling Analyst/Trader

Scheduling Analyst/Real-time Trader

Settlements Analyst

Lead Settlements Analyst

### **LIST OF AFFILIATES**

OMPA has no affiliates that either employ or retain a marketing function.

### **LISTING OF SHARED FACILITIES**

The OMPA offices located at 2701 W. I-35 Frontage Road, Edmond, Oklahoma is a facility shared by management, engineering and marketing function employees.

## LISTING OF MARKETING FUNCTION EMPLOYEES

Melie Vincent

Natasha Brown

Dacia Hargraves

Karla Juarez

Ryan Tuter

Charles Gonzales

Phillip Stayton

Keith Epperson

Staci Oliver

Jeremy Wilson

Version	Date	Action	Approval
01	10-08-2011	Original	
02	01-19-2012	Removed Transmission Function Employees and related requirements around same	Approved by C.H.
03	09-16-14	Updated List of Employees	Approved by D.O.
04	02-28-17	Updated List of Employees; Impacted Positions	Approved by D.O.
05	02-22-18	Updated List of Employees; Impacted Positions	