

**GOLDEN PASS PIPELINE COMPANY LP's  
WRITTEN PROCEDURES FOR COMPLYING WITH  
THE FERC's AFFILIATE STANDARDS OF CONDUCT REGULATIONS**

Golden Pass Pipeline Company LP ("GPPL") has implemented these Written Procedures in order to comply with the Affiliate Standards of Conduct ("Standards") promulgated by the Federal Energy Regulatory Commission ("FERC").<sup>1</sup>

These Written Procedures took effect on August 26, 2005, and will remain in effect until modified.

GPPL is a Delaware limited partnership. Its general partner is Golden Pass Pipeline Management LLC, a Delaware LLC. Its limited partner is Golden Pass Pipeline Investments LLC, a Delaware LLC. Golden Pass Pipeline Management LLC is wholly owned by ExxonMobil LNG Market Development Inc., which is a wholly owned subsidiary of Mobil Corporation. Mobil Corporation is a wholly owned subsidiary of Exxon Mobil Corporation ("ExxonMobil"). Affiliates and subsidiaries of any of the owners may qualify as GPPL's "Energy Affiliates."<sup>2</sup> Golden Pass LNG LP ("Golden Pass LNG"), a Delaware limited partnership, is an affiliate of GPPL.

By order issued on July 6, 2005, the FERC authorized Golden Pass LNG to construct and operate an LNG receiving terminal to receive, store and vaporize imported LNG which will be regasified and sent out through an onsite metering station and transported on GPPL's system.<sup>3</sup> The July 6 Order also approved Golden Pass LNG's proposal to operate its terminal on a proprietary basis. The operation of the terminal will not be subject to the FERC's open-access regulations, and Golden Pass LNG will not maintain a tariff or rate schedules for its terminalling service.<sup>4</sup> The July 6 Order also authorized GPPL to construct and operate its pipeline system. In contrast to Golden Pass LNG, GPPL will operate on an open-access basis pursuant to Part 284 of the FERC's Regulations, and will maintain its FERC Gas Tariff on file with the FERC and on its website once transportation services have commenced.

Under the anticipated construction timetable for the Golden Pass LNG/GPPL project, the facilities will be placed into service no earlier than 2008. Thus, GPPL is not currently providing any jurisdictional services, and will not be doing so for the foreseeable future. Moreover, following a 60-day open season, GPPL awarded all of its available firm capacity (2,600,910 dth) to Golden Pass Trading Company Inc. ("Golden

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<sup>1</sup> 18 C.F.R. §358.4(e)(6)(requiring each Transmission Provider to post current written procedures on the OASIS or Internet web site).

<sup>2</sup> Terms used in these Written Procedures have the same meaning as used in the Standards of Conduct, generally found at Part 358.

<sup>3</sup> *Golden Pass LNG LP*, 112 FERC ¶61,041 (2005)("July 6 Order").

<sup>4</sup> Thus, Golden Pass LNG is not a "Transmission Provider" within the meaning of the Commission's Regulations at 18 C.F.R. §358.3(a).

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Pass Trading”),<sup>5</sup> which had submitted the only bid during the open season period.<sup>6</sup> Thus, at present the proposed GPPL system is fully subscribed on a firm basis.

No ExxonMobil subsidiary or affiliate is currently providing services as a jurisdictional natural gas company within the meaning of the Natural Gas Act (“NGA”).<sup>7</sup>

At the present time, GPPL does not anticipate soliciting additional business, although it may engage in the negotiation of interconnection agreements with some or all of the non-affiliated pipelines with which it may physically interconnect, and will seek to finalize its firm service agreement with its shipper, Golden Pass Trading. GPPL will not be providing transportation services for these other pipelines, many of which are themselves Transmission Providers as defined in Section 358.3(a). Thus, for a period that will span several years, GPPL does not plan to solicit business (other than the open season conducted in conjunction with its certificate application, as discussed above).<sup>8</sup>

ExxonMobil and its subsidiaries and affiliates have worked together to ensure that GPPL complies with the Standards. These efforts have included (1) arranging for the proper separation of personnel; (2) arranging for the training of personnel; (3) development of an adequate record-keeping system; and (4) ensuring that the required postings are made on GPPL’s website.

### **I. COMMITMENT TO COMPLIANCE WITH THE STANDARDS**

GPPL is committed to complying with all FERC regulations, including the Standards. GPPL either has established or will establish, as appropriate, and will maintain the training and risk control systems specified in these Written Procedures to operate in compliance with all FERC regulations and other requirements.

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<sup>5</sup> Golden Pass Trading is affiliated with GPPL, and is an “Energy Affiliate” of GPPL within the meaning of the Standards. 18 C.F.R. §358.3(d).

<sup>6</sup> July 6 Order, 112 FERC ¶61,041 at P 10.

<sup>7</sup> On June 20, 2005, the FERC authorized another ExxonMobil subsidiary, Vista del Sol Pipeline LP (“VDSPL”), to construct and operate facilities in interstate commerce that will be subject to the NGA. *Vista del Sol LNG Terminal LP and Vista del Sol Pipeline, LP*, 111 FERC ¶61,432 (2005). The timetable for construction and commencement of operations of the VDSPL project is generally comparable to the GPPL project, *i.e.*, the facilities are not expected to be placed into service until 2008 at the earliest.

<sup>8</sup> *See, Standards of Conduct for Transmission Providers*, 109 FERC ¶61,325 (Order No. 2004-C) at P 46 (“... when a Transmission Provider begins soliciting business or negotiating, it is engaging in transmission functions and is subject to the Standards of Conduct requirements.”)

## **II. CHIEF COMPLIANCE OFFICER (“CCO”)**

GPPL has designated John W. Poe as GPPL’s Chief Compliance Officer (“CCO”). The CCO is the contact for all Standards compliance issues, and is responsible for implementing these Written Procedures.<sup>9</sup>

The CCO’s responsibilities include the following:

- Addressing internal and external FERC regulatory compliance issues related to the Standards.
- Maintaining any information and documentation reflecting compliance issues and their resolution.
- Overseeing the posting of information on the GPPL website to ensure compliance with applicable FERC rules and regulations.
- Maintaining contemporaneous detailed written records documenting the implementation of these Written Procedures.

The CCO’s contact information is as follows:

John W. Poe  
ExxonMobil Gas & Power Marketing Company  
A division of Exxon Mobil Corporation  
CORP-EMB-3623A  
P.O. Box 2180  
Houston, TX 77252-2180  
(713) 656-9391  
[john.w.poe@exxonmobil.com](mailto:john.w.poe@exxonmobil.com)

## **III. GENERAL TRAINING**

GPPL will train all personnel<sup>10</sup> that will have access to GPPL’s transmission-related information or confidential customer information in the requirements imposed by the Standards.

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<sup>9</sup> 18 C.F.R. §358.3(e)(6) (requiring designation of CCO).

<sup>10</sup> GPPL probably will not have any employees. Instead, GPPL anticipates that it will enter into service agreements with two affiliates of ExxonMobil which will assign employees to provide services to GPPL: (1) ExxonMobil Development Company and (2) ExxonMobil Pipeline Company. Neither of these entities are “Energy Affiliates” of GPPL as defined in Section 358.3(d) of the FERC’s Regulations. (ExxonMobil Pipeline Company is engaged in transporting crude oil, refined petroleum products, liquefied petroleum gas, natural gas liquids and chemical feedstocks. It is not a “natural gas company,” and is not a Transmission Provider as defined in the Standards.) When using the term “personnel,” these Written Procedures intend to include all ExxonMobil personnel (including employees, agents, contractors and consultants) who work on GPPL-related matters, including personnel assigned to GPPL matters, officers and

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In addition, GPPL will train all shared support personnel that will provide service to both GPPL and an Energy Affiliate of GPPL. All personnel trained in the requirements of the Standards will have either signed an affidavit or will have certified electronically to the CCO that they (1) have received training and (2) will not act as a conduit for sharing transmission, market, or confidential non-affiliated shipper information with any Energy Affiliate personnel.

Specifically, GPPL will use the procedures described below to ensure that all personnel subject to the requirements of the Standards are properly trained. The CCO is responsible for overseeing the training program, ensuring compliance with the training program and updating the training program as needed.

In addition, all GPPL personnel and appropriate Energy Affiliate personnel will receive a copy of these Written Procedures.

**A. Current Personnel**

**1. GPPL will identify personnel who need to be trained.**

GPPL will review its personnel lists and identify all personnel that will have access to GPPL's transmission-related information or confidential customer information. GPPL will also identify support personnel that are shared with Energy Affiliates.<sup>11</sup>

**2. GPPL will develop a training program and require personnel to pass a test demonstrating understanding of the Standards.**

GPPL is working toward the development of a training program (including the possibility of an online, interactive training program) that explains the Standards. After completing the training program, all trainees will be required to pass a test on the Standards to confirm their understanding of the material. Under the training program as currently envisioned, once the trainee has passed the test, the trainee will be required to certify (either by affidavit or electronically) that she/he has (1) completed the training program in the Standards, (2) passed the accompanying test, and (3) committed to abide by the Standards in the future. The trainee will be required to fax that affidavit to the CCO or to certify electronically that she/he has completed the training program.

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directors overseeing GPPL operations, and third-party personnel who perform services for GPPL, such as outside accountants who provide accounting services for GPPL.

<sup>11</sup> As discussed above, GPPL does not anticipate having any employees. GPPL's "employees" will be personnel assigned to GPPL from other ExxonMobil subsidiaries and affiliates. In addition to personnel of ExxonMobil Development Company and ExxonMobil Pipeline Company, GPPL anticipates sharing the following categories of personnel with its other ExxonMobil subsidiaries and affiliates: (1) payroll service providers; (2) PC desktop support; (3) travel service; (4) personnel who manage the aviation and marine traffic used to transport maintenance personnel; (5) accounting; (6) corporate tax service group; (7) field and maintenance personnel and (8) legal personnel.

**3. ExxonMobil employees must complete training and sign an affidavit.**

It has not been determined who the operating entity of GPPL will be. In any case, the personnel who are operating GPPL, including employees, agents, contractors and consultants of ExxonMobil or its affiliates, will be trained. Such personnel will be required to complete the GPPL training program and confirm that they have done so, as discussed above.

**4. The CCO is responsible for record-keeping.**

The CCO will collect and retain the affidavits of those personnel who complete the training as a record to demonstrate GPPL's compliance with the obligations imposed by the Standards.

**B. Future Personnel.**

**1. New personnel, which may include employees, must comply with the training requirements.**

As new personnel (either newly hired or transferred from another entity within ExxonMobil) are assigned to GPPL, the CCO will ensure they complete the required training.

**2. The CCO will identify new personnel that need to be trained.**

The CCO will determine whether new (or newly transferred) personnel require training in the Standards. In addition, the CCO will periodically determine if any personnel who should receive training have not completed the required training. Any personnel found not to have taken the training program will be required to receive training.

**C. The CCO must update the training program.**

The Standards impose special obligations on certain types of personnel. Therefore, GPPL will develop written guidelines that specifically explain how the Standards impact these personnel. For example, GPPL will develop written guidelines, when applicable, for senior officers and directors; risk management personnel; transferred personnel; IT personnel; human resources personnel; and personnel responsible for posting information on the GPPL website. These guidelines will contain the same basic information discussed in the general training program, but also provide a more detailed analysis of how the Standards may impact a specific job category. These guidelines will be considered supplemental materials, and will not replace the general training and certification requirements described above.

**IV. SEPARATION OF FUNCTIONS/RESTRICTING ACCESS TO INFORMATION**

Due to long lead time prior to commencement of operations, GPPL does not presently have any employees that meet the definition of Transmission Function

Employees<sup>12</sup> as set forth in the regulations. At an appropriate time, GPPL will post a list of such employees on its website. Except in emergency circumstances affecting system reliability,<sup>13</sup> GPPL's Transmission Function Employees will function independently from all Energy Affiliate personnel. In addition, GPPL will take the steps set forth below to ensure that Energy Affiliate personnel do not have preferential or inappropriate access to (1) GPPL's transmission-related facilities or (2) any of GPPL's transmission-related information or confidential customer information.

**A. Energy Affiliate Personnel Will Not Have Preferential Access to GPPL's Transmission-Related Facilities.**

Because GPPL's system is not yet constructed, GPPL does not presently have a system control center or similar facilities. Upon completion of construction of the system and commencement of operations, GPPL will ensure that Energy Affiliate employees will not have preferential access to the system control center or any similar facilities used for transmission operations or reliability functions.

**1. List of Transmission-Related Facilities**

Because GPPL's system has not been constructed as of this time, the precise location of GPPL's system control center has not been determined.

**2. Measures Taken to Secure Transmission-Related Facilities.**

The entrance(s) to GPPL's transmission-related facilities will be designed such that only personnel with the requisite clearance will be permitted to enter GPPL's transmission-related facilities. GPPL will prohibit Energy Affiliate employees from having preferential access to such facilities.

**B. Energy Affiliate Employees Will Not Have Preferential Access to Transmission-Related or Confidential Customer Information.**

Energy Affiliate employees will not have preferential access to any of GPPL's transmission-related information or confidential customer information.

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<sup>12</sup> As defined in 18 C.F.R. §358.3(j), Transmission Function Employee means "an employee, contractor, consultant or agent of a Transmission Provider who conducts transmission system operations or reliability functions, including, but not limited to, those who are engaged in day-to-day duties and responsibilities for planning, directing, organizing or carrying out transmission-related operations."

<sup>13</sup> The FERC's Regulations provide an exception from the Independent Functioning requirements at 18 C.F.R. §358.4(a) for such emergencies. In the event of an emergency that requires a departure from the Standards, GPPL will develop a form that must be completed and sent to the CCO. The CCO is responsible retaining the proper records detailing the circumstances surrounding the emergency and GPPL's response.

**1. Facilities Containing Transmission-Related or Confidential Customer Information.**

GPPL personnel have offices at 800 Bell Street, Houston, Texas, and 12450 Greenspoint Drive, Houston, Texas. The offices at 800 Bell Street are in the same building in which Energy Affiliates have offices. However, GPPL's offices are located on a separate floor, and access to transmission-related information and confidential customer information is secured in a file room with restricted card-key access. The Greenspoint Drive office also has restricted card-key access. Thus, Energy Affiliate employees do not have uncontrolled or preferential access to GPPL's transmission-related information and confidential customer information.

**2. IT Systems Containing Transmission-Related or Confidential Customer Information.**

GPPL will ensure that Energy Affiliate employees do not have preferential access to IT systems (hardware or software) containing GPPL's transmission-related or confidential customer information.

GPPL will password protect its own IT systems to ensure that Energy Affiliate employees cannot access these systems. All requests for access to GPPL's gas pipeline information will be required to go through, and be approved by, the manager of gas pipeline control or the control manager of database access. In addition, GPPL has identified the following IT systems as being shared with Energy Affiliates:

- All ExxonMobil subsidiaries share a corporate-wide e-mail system. Energy Affiliate employees will not have access to GPPL personnel e-mail. Access to each employee's e-mail accounts is password protected.
- ExxonMobil uses SAP, an accounting and financial reporting platform, for its entire U.S. operations. It is anticipated that following the commencement of operation of the GPPL system, a limited amount of transmission-related and customer information will be uploaded from GPPL's system to SAP. This information could include shippers' names, contract numbers, and total revenue by contract. SAP will not contain other forms of transmission-related information, such as available transmission quantities, price, curtailments, maintenance schedules, or capacity expansion plans. As such, there would be only limited transmission-related or customer information on SAP. Operations and maintenance of SAP is outsourced to a business and technology consultant providing accounting services. These consultants will have been trained in the Standards prior to commencement of operations requiring use of the platform.
- ExxonMobil affiliates and subsidiaries share a file server. As noted above, the transmission-related and customer information pertaining to GPPL's operations will be password-protected, and access to such information will be controlled by the manager of gas pipeline control.

- Other than its e-mail system, accounting software, and the file server listed above, GPPL will not share any IT systems that access or contain transmission system or confidential customer information with its Energy Affiliates. Moreover, Energy Affiliate personnel will not have uncontrolled or preferential access to any other GPPL IT system. These measures to protect GPPL's IT systems, combined with GPPL's measures to limit Energy Affiliates' access to GPPL's transmission-related facilities, will ensure that GPPL and its Energy Affiliates function independently, in accordance with the Standards.

**C. Periodic Review of Procedures To Ensure Enforcement of the Standards.**

In compliance with the Standards, GPPL will periodically conduct an independent review of its procedures to ensure that no Energy Affiliate personnel will have unescorted access to facilities that contain transmission system or confidential customer information. GPPL will permit personnel of non-affiliated entities a comparable degree of access, and make them subject to the same access restrictions, as Energy Affiliate personnel.

In addition, the CCO will review all matters relating to access to transmission information and confidential customer information to ensure continuing compliance with the Standards. The CCO's review will include the following:

- Updating and maintaining the list of all existing facilities, software, and databases that contain GPPL's transmission information or confidential customer information.
- Ensuring that Energy Affiliate employees do not have access to such facilities, software, or database programs.

**V. NON-DISCRIMINATION**

The procedures for prohibiting Energy Affiliate employees from having preferential access to any transmission-related or confidential customer information are discussed in Section IV above. In addition, GPPL's personnel will be trained in the Standards, and will not act as conduits for passing along transmission-related or confidential customer information to Energy Affiliate employees through non-public means.

As required by the Standards, if and to the extent GPPL personnel inappropriately disclose transmission-related or confidential customer information to an Energy Affiliate, GPPL will immediately post that information on its website. To facilitate this process, GPPL will develop (1) written guidelines prohibiting the sharing of transmission-related or confidential customer information with an Energy Affiliate employee and (2) a form for reporting any unauthorized information disclosure. In the event of an unauthorized disclosure, the form is to be completed promptly and sent to the CCO, who will be responsible for ensuring that the information is contemporaneously posted on the website. The CCO will also be responsible for (1) investigating the reason for the unauthorized disclosure, (2) taking any steps to rectify the situation, and (3) establishing necessary procedures to prevent similar occurrences.

The Standards permit GPPL personnel to share with an Energy Affiliate information provided by a non-affiliated transmission customer that voluntarily consents in writing to allow GPPL to share the consenting customer's information. GPPL will post such consents on its website, along with a statement verifying that GPPL did not provide any preference, either operational or rate-related, in exchange for the consent. GPPL will develop written guidelines for obtaining the non-affiliated customer's consent. In addition, GPPL will develop two forms: (1) a form that the customer should complete to verify its consent, and (2) a form that GPPL should complete if the information is actually shared with an affiliate. Completed copies of both of the forms must be sent to the CCO for monitoring and record-keeping. This procedure is intended to enable GPPL to monitor which Energy Affiliates receive non-affiliated customer information.

GPPL is not required to disclose contemporaneously to all transmission customers information relating solely to an Energy Affiliate's specific request for transmission service. GPPL is permitted to share with Energy Affiliates information necessary to maintain the operation of the transmission system.

## **VI. TARIFF**

The July 6 Order found that GPPL's proposed tariff generally complied with the FERC's Regulations, but directed GPPL to modify the tariff in several respects.<sup>14</sup> The Order requires GPPL to file actual tariff sheets consistent with the directives of the Order at least 30 days but no more than 60 days prior to commencement of service. Thus, GPPL does not anticipate having in effect a FERC Gas Tariff until 2008 at the earliest.

GPPL will strictly enforce all tariff provisions that do not permit GPPL to exercise discretion. For those tariff provisions that do permit GPPL to exercise discretion, GPPL will implement those provisions in a fair and impartial manner that treats all transmission customers in a non-discriminatory manner. GPPL will maintain a written log detailing the circumstances and manner in which it exercised its discretion under the tariff, and that log will be posted on its website within 24 hours of GPPL exercising such discretion. To facilitate this process, GPPL will develop a form that must be completed when discretion is exercised. A completed form must be sent to the CCO, who will be responsible for ensuring that the information is posted on GPPL's website within 24 hours of GPPL's exercise of discretion.

GPPL will process all similar requests for transportation service in the same manner and within the same period of time.

GPPL will not, through its tariff or otherwise, give preference to an Energy Affiliate over any other transmission customer in matters relating to the sale or purchase of transmission service, including but not limited to (1) price, (2) curtailment, (3) reliability, (4) priority, or (5) balancing.

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<sup>14</sup> July 6 Order, 112 FERC ¶61,041 at PP 33-77.

## **VII. POSTINGS/DISCOUNTS**

### **A. Discounts**

GPPL will comply with the Standards' posting requirements and with Part 284 of the FERC's Regulations. This compliance includes the posting of any offer of a discount for any transmission service on GPPL's website contemporaneously with the time the offer is contractually binding.<sup>15</sup> GPPL has not offered any discounts. Any discount posting will include (1) the name of the customer; (2) whether it is affiliated with GPPL, or whether an affiliate of GPPL is involved in the transaction; (3) the rate offered; (4) the maximum rate; (5) the time period for which the discount will apply; (6) the quantity upon which the discount is based; (7) the delivery points; and (8) any conditions or requirements applicable to the discount.

### **B. Organization Charts**

In preparation for making the initial postings required by the Standards, GPPL reviewed a list of all ExxonMobil subsidiaries and affiliates to identify affiliates that qualify as Energy or Marketing Affiliates. GPPL will post that list, along with the names and addresses of those Energy or Marketing Affiliates, on its website.

GPPL will develop a list of the facilities shared with its Energy Affiliates and will post that list on its website. The list will include descriptions and addresses of these shared facilities. GPPL will post an organization chart on its website that will show the relative position of GPPL within ExxonMobil, and its position relative to all Energy Affiliates.

GPPL is reviewing the job functions of its personnel and will post on its website the following information: (1) business unit, (2) job title and description, (3) chain of command for all positions, including offices and directors, but excluding clerical, maintenance and field positions. The job titles and descriptions include the position's title, the position's duties, whether the position is involved in transmission or sales, and the name(s) of the supervisory personnel who manage non-clerical personnel involved in transmission or sales.

Following commencement of operations, as part of its job function review as described in the preceding paragraph, GPPL will review whether any personnel engaged in transmission functions for GPPL also performs services for an Energy Affiliate (*e.g.*, shared officer or director), and has posted such information on its website.

GPPL will review and update the organizational charts in accordance with the Standards to ensure that the charts accurately reflect GPPL's then-current (1) organizational structure, (2) personnel listings and (3) job descriptions. GPPL will review all website postings to ensure that they accurately reflect the names and job descriptions of appropriate personnel who may have transferred to or from GPPL's transmission functions.

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<sup>15</sup> 18 C.F.R. §358.5(d)

**C. Transfers**

GPPL will post notices of any personnel transfers between GPPL and any of GPPL's Marketing or Energy Affiliates, including (1) the name of the transferring personnel, (2) the respective titles held while performing each function, and (3) the effective date of the transfer. GPPL will retain the posting on its web site for not less than 90 days.<sup>16</sup>

**D. Updating**

In connection with the posting requirements described above, the CCO will be responsible for ensuring the following:

- Updating the corporate and personnel organization charts on GPPL's website.
- Coordinating with the appropriate ExxonMobil group to ensure that the CCO is notified within three (3) business days of a change in corporate structure following the effective date of the change.
- Coordinating with the Human Resources group and/or the appropriate operating group to notify the CCO of a change in personnel status within five (5) business days after the effective date of the change.
- Updating the GPPL website after a material change in corporate structure or personnel status.

GPPL will update the required website postings on a timely basis for changes in personnel, job descriptions or corporate structures.

In addition, the CCO will be responsible for the following:

- Reviewing the complete corporate structure.
- Reviewing the applicable personnel listing from the Human Resources group.
- Determining if the GPPL website's corporate structure and personnel postings are accurate by comparing them to the updated listings.

These reports will allow GPPL to update the postings on its website in the event the review shows that some changes were not reflected when they occurred. They are not intended to replace the near real-time posting of changes.

**E. Potential Merger Partners**

GPPL will post the name(s) and address(es) of potential merger partner(s) treating those entities as affiliates within seven days after the potential merger is publicly announced.<sup>17</sup>

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<sup>16</sup> 18 C.F.R. §358.4(c).

<sup>17</sup> 18 C.F.R. §358.4(b)(3)(v); Order No. 2004-B, Paragraph 85.

## **VIII. BOOKS AND RECORDS/DOCUMENT RETENTION**

GPPL will maintain its books of accounts and records separately from those of its Energy Affiliates. These books and records will be available for inspection by the FERC. In addition, GPPL will keep records demonstrating its compliance with the Standards. The CCO is responsible for:

- Maintaining the records and affidavits demonstrating that all required personnel have been trained in the Standards.
- Maintaining the documentation showing periodic review of the security of the facilities, software, and databases. If necessary, maintaining documentation explaining changes implemented to keep transmission-related and confidential customer information secure.
- Maintaining a written log detailing the circumstances and manner in which it exercised its discretion under the tariff.
- Retaining all records relating to GPPL's compliance with the Standards for at least three years, including copies of all website postings.