

White River Hub, LLC

Standards of Conduct Written Procedures

Last Updated August 25, 2011

§ 358.1 Applicability

The Federal Energy Regulatory Commission (FERC) Standards of Conduct are intended to prohibit Transmission Function Employees (TFE), who are interstate natural gas pipeline employees actively and personally engaged on a day-to-day basis in transmission functions, from inadvertently or intentionally giving Marketing Function Employees (MFE), employees of its affiliate(s) who engage in gas marketing and trading functions, undue preferences over the pipeline's other non-affiliated transmission customers. On October 16, 2008, the FERC issued Order No. 717 which changed the FERC's approach to Standards of Conduct by focusing on an employee's *function* rather than the company he/she works for. An employee who functions in a transmission or marketing role, no matter what business unit he/she works for, is subject to Standards of Conduct. Portions of these standards (i.e., no-conduit rule which will be discussed later) also apply to employees who are not TFE's or MFE's but are entrusted with non-public transmission function information. This document outlines White River Hub, LLC (WRH) procedures implementing Standards of Conduct.

§ 358.2 General Principles

To understand the specific requirements of Standards of Conduct and WRH implementation procedures, one must understand the guiding principles of the standards. The FERC has identified four general guiding principles. These are: Non Discrimination,

Independent Functioning, No Conduit and Transparency.

Non Discrimination: A transmission provider must not unduly discriminate or grant undue preference or advantage to any person with respect to natural gas transmission.

Independent Functioning: A transmission provider's transmission function employees (TFEs) must function independently of its marketing function employees (MFEs).

No Conduit: 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.

Transparency: A transmission provider must provide to its transmission function customers equal access to non-public transmission function information.

§ 358.3 Definitions

WRH is a Transmission Provider as defined in §358.3 of Standards of Conduct, and is referred to in these Standards of Conduct Written Procedures as "Transmission Provider" or WRH. Affiliates of WRH who employ MFEs as defined in §358.3 of Standards of Conduct are posted at www.whiteriverhub.com, Informational Postings, [Standards of Conduct](#), [Affiliate Names and Address](#). MFEs of WRH are employees who actively and personally, on a day-to-day basis, engage in natural gas marketing functions.

§ 358.4 Non-discrimination requirements

Tariff provisions will be strictly adhered to unless the tariff specifically provides that WRH may exercise its discretion or waive a provision.

Supervisors and employees of WRH operations, with the authority to grant and/or approve waivers or use discretion, will be trained on and follow these procedures. Supervisors

and employees with the above-described authority will also follow the gas tariff and any other applicable policies and/or procedures.

WRH will process all similar requests for transportation services in the same manner and within the same period of time. Specifically, employees with WRH responsibilities will follow WRH's tariff relating to fair and impartial transmission service. All similar requests for transmission service will be processed in the same manner and within the same period of time.

§ 358.5 Independent functioning rule

WRH TFEs will at all times function independently from MFEs. WRH TFEs will not permit MFEs to:

1. Conduct transmission functions; or
2. 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.

WRH files containing non-public transmission provider information will be secured to prevent MFEs from accessing this information. WRH and its affiliates employing MFEs will maintain separate business applications.

WRH TFEs may share non-public transmission function information with WRH Management Committee members as appropriate. WRH Management Committee members will not act as conduits to share non-public transmission function information with MFEs. WRH Management Committee members, as well as all employees acting on behalf of WRH, will receive Standards of Conduct training annually from their respective companies.

§ 358.6 No conduit rule

WRH will enforce the following activities to ensure information access compliance:

1. No MFE or other unauthorized person will have access to WRH business systems or files.
2. TFEs and employees entrusted with non-public transmission function information will be instructed not to allow MFEs access to this information.
3. TFEs and employees entrusted with non-public transmission function information will be instructed to review e-mail distribution lists to ensure that they are accurate so that e-mails containing non-public transmission function information are not sent inadvertently to MFEs.
4. TFEs and employees entrusted with non-public transmission function information will be instructed to not discuss non-public transmission function information with MFEs or those who do not require this information.

§ 358.7 Transparency

A transmission provider's TFE may discuss with its MFE a specific request for transmission service submitted by the MFE. The transmission provider is not required to contemporaneously disclose information if it relates solely to an MFE's specific request for transmission service. WRH TFEs and MFEs may exchange information necessary to maintain or restore operation of the transmission system. In such cases WRH will make and retain a contemporaneous record of all such exchanges. WRH will make the record available to the Commission upon request.

WRH will not share any applicable non-public, non-affiliated customer or potential customer information with its MFE unless the non-affiliated customer or potential customer has given its written consent. WRH will post the written consent on the Internet web site along with a statement that it did not condition its business relationships with any customer or potential customer in any way based on the provision or non-provision of such consent. This information

will be posted to www.whiteriverhub.com, Informational Postings, [Standards of Conduct](#), Voluntary Consent.

WRH has posted its written procedures on the Internet web site at: www.whiteriverhub.com, Informational Postings, [Standards of Conduct](#), Implementation Procedures. The written procedures will also be distributed, via e-mail, hard copy, annual training or in other ways be made available to all TFEs, MFEs and support employees.

WRH has no employee-staffed facilities shared by TFEs and MFEs.

WRH will post the names and addresses of potential merger partners as affiliates that may employ or retain MFEs on the Internet web site within seven days after a potential merger is announced. The Internet web site address is: www.whiteriverhub.com, Informational Postings, [Standards of Conduct](#), Potential Mergers.

The WRH Management Committee will be responsible to report any announced mergers to the CCO. Such information will be posted within seven days after the announcement.

WRH will post on the Internet web site the job titles and job descriptions of TFEs. This information may be found on the Internet web site under: www.whiteriverhub.com, Informational Postings, [Standards of Conduct](#), [Affiliate Names and Addresses](#). The information will be updated as required by FERC Standards of Conduct requirements.

If a WRH TFE waives a tariff provision in favor of an affiliate, unless such waiver has been approved by the Commission, the transmission provider will post such waiver on its Internet web site. WRH will maintain a log of all waivers granted to an affiliate. Entries to the log will be posted by the department exercising tariff waiver provisions and will be made within 24 hours after such waiver or discretion is exercised. The waiver log information will include

the transmission provider's name, tariff provision being waived, tariff section allowing waiver and the date the waiver/discretion was exercised.

WRH will make daily electronic copies of, and/or store in a database, information, including these written procedures, that is posted on its Internet web site. Information posted on the Internet web site, as required by the FERC, will be maintained by the transmission providers for a period of three years.

§ 358.8 Implementation

Questions or comments pertaining to the Standards of Conduct should be referred to the following individuals:

FERC Compliance Contacts

Corporate Chief FERC Compliance Officer – Scott Hansen (801-324-2543)

Questar Pipeline Company FERC Compliance Officer – Brad Burton (801-324-2459)

Questar Pipeline Company Director of FERC Compliance – Mark Petersen (801-324-2170)

Legal Counsel – Tad Taylor (801-324-5531)

WRH will maintain books of account and records separately from those of its MFEs. All accounts and records will be kept in such a manner as to be available for the FERC's inspection.