

BPA Policy 233-1

FERC Standards of Conduct

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1. Purpose & Background

The purpose of this Policy is to facilitate compliance with the Federal Energy Regulatory Commission's (FERC) Standards of Conduct for Transmission Providers (SOC).

On October 16, 2008, FERC issued Order No. 717 to make the SOC clearer and refocus it on areas where there is the greatest potential for abuse.¹ The SOC seeks to prevent a transmission provider's Marketing Function from gaining any kind of undue advantage in the market or preferential access to transmission.

The SOC 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. While Bonneville Power Administration (BPA) is not a public utility as defined in the Federal Power Act, BPA operates in compliance with the SOC.

2. Policy Owner

This policy is owned by the Executive Vice President of Compliance, Audit and Risk. The SOC Office is responsible for implementing and administering this policy.

3. Applicability

This policy applies to Undesignated Employees (UEs), Transmission Function Employees (TFEs), and Marketing Function Employees (MFEs), and the types of information that can be shared with MFEs and transmission customers.

4. Terms & Definitions

- A. **Marketing Function:** 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.
- B. **Marketing Function Employee (MFE):** An employee who actively and personally engages on a day-to-day basis in Marketing Functions. A list of MFEs is available on the [FERC Standards of Conduct page](#), on BPA's internal website (BPA Connection).
- C. **Open Access Transmission Tariff (Tariff or OATT):** Tariff for use of high-voltage transmission lines required by FERC under its Order 888. Designed to facilitate open, non-discriminatory access to all transmission facilities by all power providers; terms and

¹ *Standards of Conduct for Transmission Providers*, Order No. 717, FERC Stats. & Regs. ¶ 31,280 (2008), *reh'g granted in part*, Order No. 717-A, FERC Stats. & Regs. ¶ 31,297 (2009), *reh'g granted in part*, Order No. 717-B, 129 FERC ¶ 61,123 (2009), *reh'g granted in part*, Order No. 717-C, 131 FERC ¶ 61,045 (2010), *reh'g granted in part*, Order No. 717-D, 135 FERC ¶ 61,017 (2011) (collectively, Order No. 717) (codified at 18 C.F.R. § 358).

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conditions by which BPA provides nondiscriminatory transmission service that is similar to the Federal Energy Regulatory Commission’s pro forma tariff mandated for FERC jurisdictional utilities.

- D. **Open Access Same-Time Information System (OASIS):** A website used to communicate with customers, provide transmission system information, process requests for transmission service, and post notices.
- E. **SOC-Restricted Information:** Transmission Function Information or transmission customer information that is not posted to BPA’s external website or its OASIS or is otherwise not simultaneously available to all transmission customers and potential transmission customers.
- F. **Transmission Function:** The planning, directing, organizing or carrying out of day-to-day transmission operations, including granting and denying transmission service requests.
- G. **Transmission Function Employee (TFE):** An employee who actively and personally engages on a day-to-day basis in transmission functions. A list of TFEs is available on the [FERC Standards of Conduct page](#), on BPA’s internal website (BPA Connection).
- H. **Transmission Function Information:** Information relating to Transmission Functions. A list of information that is generally considered transmission function information is available on the [FERC Standards of Conduct page](#), on BPA’s internal website (BPA Connection).
- I. **Undesignated Employee (UE):** An employee who is not designated as a TFE or MFE.

5. Policy

BPA operates in compliance with the SOC. The following outlines the ways in which BPA ensures SOC compliance. This policy cannot anticipate every possible event or situation that may give rise to SOC concerns. Employees shall seek guidance at soc@bpa.gov for questions that may arise.

A. General principles

BPA will not unduly discriminate against any transmission customer, and does not provide any transmission customer, including BPA’s own Marketing Function, any undue preference or advantage.

B. Non-discrimination requirements

1. TFEs are responsible for implementing Tariff language as written. If the Tariff language allows for discretion, then that discretion must be applied in a fair and impartial manner. It is the responsibility of managers to ensure their employees know and understand the OATT provisions and that use of discretion is done so in accordance with this requirement.

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2. TFEs must not give any undue preference to any transmission customer including BPA's own Marketing Function in matters relating to sale or purchase of transmission service.
3. TFEs must process all similar requests for transmission in the same manner and within the same period of time.
4. If BPA waives any OATT provision in favor of BPA's Marketing Function, whoever grants the waiver must notify the SOC Office and the Transmission Reservation Desk. The SOC Office must log the waiver and the Transmission Reservation Desk must post notice of the waiver to OASIS.

C. Employee designations

1. The SOC Office determines what positions should be designated as TFE, MFE, or UE, depending on the job duties that position performs.
2. Human Resources Service Center (HRSC) assigns an SOC designation to all federal positions through its classification process using the determination established by the SOC Office.
3. The SOC Office assigns a TFE SOC designation to contract workers who are performing TFE job duties. All other contract workers are considered UEs. Contract workers cannot perform MFE job duties.
4. Instructions for locating BFTE and CFTE designations are available on BPA's [FERC Standards of Conduct page](#).
5. The SOC Office issues badges to TFEs and MFEs to provide a visible indication of their designations. TFEs and MFEs must wear these badges. The SOC Office issues badges to UEs by request.

D. Independent functioning rule

1. MFEs and UEs are prohibited from conducting Transmission Functions, and TFEs and UEs are prohibited from conducting Marketing Functions.
2. **Physical separation and access restrictions**
 - a) MFEs are prohibited from accessing the Dittmer building in Vancouver, Washington, and the rooms designated as transmission rooms in the Munro Scheduling Center in Spokane, Washington, because these locations contain the transmission control systems and the facilities where transmission functions are performed.
 - b) MFEs and TFEs both have access to the Emergency Scheduling Center (ESC) in Vancouver, Washington, but are prohibited from accessing it at the same time except in an emergency situation. MFEs and TFEs who plan to occupy the ESC must notify the SOC Office and others via the ESC Occupation email list. All ESC Occupations are tracked by the SOC Office.

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3. Electronic separation and access restrictions

- a) MFEs are prohibited from accessing SOC-Restricted Information that is stored in internal shared or network drives, SharePoint sites, and electronic information systems. The SOC Office maintains a list of electronic access controls designed to prevent MFE access to this information.
- b) UEs and TFEs must safeguard SOC-Restricted Information by not attaching such documents to Outlook meeting invitations or SharePoint sites where information can be inadvertently disclosed to a MFE.
- c) SharePoint Site Content Owners, Outlook distribution list owners, Outlook shared mailbox owners, electronic information system Information Owners, and other software and site administrators must update permissions and lists accordingly when the MFE list is updated.

4. Joint meetings and interactions

- a) Business-related meetings and other interactions (e.g., e-mails and telephone conversations) between TFEs and MFEs are generally prohibited unless a specific exception applies. For exceptions to the Independent Functioning and No Conduit Rules, see section F below.
- b) Business-related meetings
 - i) Anyone who wishes to schedule a business-related meeting that does not fall into an exception described below with TFEs and MFEs in attendance must obtain approval from the SOC Office before the meeting. The SOC Office will evaluate whether the meeting is permissible and what additional controls are necessary.
 - ii) Anyone who facilitates any business-related meeting with TFEs and MFEs in attendance, regardless of whether it falls into an exception must:
 - a. Remind all meeting attendees at the beginning of the meeting that both MFEs and TFEs are present and that no SOC-Restricted Information may be discussed.
 - b. Provide a written record of the meeting to the SOC Office. The record should include attendees and a summary of what was discussed.
- c) Other interactions

TFEs must provide a record of all other business-related interactions (e.g., e-mails and telephone conversations) with MFEs to the SOC Office or cc soc@bpa.gov on emails, regardless of whether the interaction falls into an exception. The record should include participants and a summary of what was discussed.

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- d) MFEs and TFEs may jointly attend non-business related meetings including all-employee meetings, all-manager meetings, required trainings, non-business related job skills trainings, and social events. Interactions about non-business matters do not need to be reported to the SOC Office.

E. No Conduit Rule

1. UEs and TFEs are prohibited from disclosing SOC-Restricted Information to MFEs. Exceptions to this prohibition are described in section F below.
2. If information is posted on BPA's external website or its OASIS, or is otherwise simultaneously available to all transmission customers and potential transmission customers, then it is considered public within the context of the SOC requirements and can be shared with MFEs.
3. If any UE or TFE discloses SOC-Restricted Information to a MFE, or a MFE becomes aware of SOC-Restricted Information (e.g., realizes they have access to a SharePoint site or shared or network drive with restricted information or receives an email with restricted information), the individual who becomes aware of the disclosure must notify the SOC Office as soon as possible via email (soc@bpa.gov) and take steps to limit the dissemination of the information (e.g., change permissions to the SharePoint site or delete the email).

F. Exceptions to Independent Functioning and No Conduit Rules

Consistent with FERC Order 717, exceptions to the Independent Functioning and No Conduit rules permit interactions between MFEs and TFEs and the limited disclosure of non-public Transmission Function Information to MFEs.

1. UEs and TFEs may discuss or share with MFEs any non-public Transmission Function Information that relates solely to BPA's Marketing Function's own request for transmission service.
2. Transmission customers may voluntarily consent, in writing, to allow BPA to disclose their non-public information to MFEs. The consent must be in writing and posted to BPA's [external SOC website](#) before their information can be shared with MFEs. Account Executives who have customers who would like to voluntarily consent must work with the SOC Office to prepare the consent.
3. UEs and TFEs may discuss or share information with MFEs pertaining to compliance with reliability standards that have been approved by FERC. This exception does not apply to proposed or potential standards. Any non-public Transmission Function Information exchanged must be provided to the SOC Office.
4. UEs and TFEs may discuss or share information with MFEs that is necessary to maintain or restore operation of the transmission system or generating units, or that may affect the dispatch of generating units. The Senior Dispatcher on shift may suspend certain aspects of SOC (such as the Independent Functioning or No Conduit

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rules) in the event of an emergency event pursuant to Dispatcher Standing Order 137. Any non-public Transmission Function Information exchanged must be documented and provided to the SOC Office. The SOC Office shall maintain those records in accordance with SOC.

G. Transparency Rule

In the event of a violation of the No Conduit Rule, the SOC Office immediately coordinates with the Transmission Reservation Desk to post notice of the disclosure to BPA's OASIS.

1. If the information that was disclosed was non-public transmission customer information or any other information FERC has determined to be subject to limited dissemination, the SOC Office posts notice that the disclosure occurred.
2. If the information that was disclosed was non-public Transmission Function Information, then the SOC Office posts the information itself.

H. Posting requirements

The SOC Office coordinates with the Transmission Reservation Desk and Transmission Services Web Content team to post the following to BPA's external SOC website and OASIS, in accordance with the SOC requirements:

1. Affiliate information: BPA's Marketing Function resides in the Power Services organization and is treated as an affiliate for SOC purposes.
2. Chief Compliance Officer: BPA has designated the head of Agency Compliance and Governance as its Chief Compliance Officer (CCO). BPA posts the CCO's name and contact information.
3. Shared facilities: BPA posts the addresses and types of facilities shared by MFEs and TFEs.
4. Transmission Function Employees: BPA posts the job titles and job descriptions of all TFEs.
5. Transfers: BPA posts any transfer of a TFE to a position as a MFE or a MFE to a position as a TFE to its OASIS.
6. Written procedures: BPA posts this written policy containing procedures for how BPA implements the SOC requirements.
7. Voluntary consents: BPA posts a list of transmission customers who have voluntarily consented to authorize BPA to disclose their non-public customer information to MFEs.
8. Information disclosures: BPA posts disclosures of SOC-Restricted Information to its OASIS.

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9. Waivers: BPA posts any waivers and exemptions of OATT provisions in favor of its marketing function to its OASIS.

I. Training

1. Managers and supervisors must ensure that all new federal employees and contract workers complete SOC training within their first 30 days of employment.
2. TFEs, MFEs, supervisors, officers, directors, and UEs likely to become privy to transmission function information must complete SOC training annually.
3. The SOC Office is responsible for delivering training and tracking completion.

- J. Internal Log:** The SOC Office logs a record of all business-related meetings and interactions (including e-mails and telephone conversations) between MFEs and TFEs for a period of five years.

- K. Books and records:** Through the use of business units within the accounting system of record, BPA maintains its books of account and records for Transmission Services separate from Power Services, which includes BPA's Marketing Function.

L. External Requests for Information

1. The SOC Office shall lead the coordination of responses to external requests for information related to BPA's SOC compliance.

6. Policy Exceptions

None.

7. Responsibilities

- A. Account Executives:** Obtain written voluntary consent from transmission customers if the customer wishes for their information to be shared with another customer. Voluntary Consents are provided to the SOC Office.
- B. All Employees:** All employees are responsible for compliance with the Standards of Conduct and this policy. Any employee who knows of or suspects noncompliance with or a violation of this policy or the Standards of Conduct is required to report such noncompliance or violation immediately. Known or suspected violations can be reported to the SOC Office at soc@bpa.gov.
- C. Chief Compliance Officer (CCO):** The CCO is the head of the Agency Compliance and Governance organization. The CCO is responsible for SOC compliance.
- D. Finance Accounting and Reporting:** Maintains Transmission Services' books of account and records separate from Power Services within the accounting system of record.

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E. Human Resources Service Center

1. Communicates new federal employees information and start dates to the SOC Office.
2. Notifies new federal employees of their required training obligations, including SOC training, through the New Employee Orientation (NEO).
3. Using SOC Office designations, assigns SOC codes for new federal employees or federal employees changing positions.

F. Managers and Supervisors

1. Ensure that new federal employees complete SOC training within their first 30 days of employment.
2. Ensure that federal employees who are required to complete annual SOC training do so by the due date established by the SOC Office.
3. Ensure all employees understand and adhere to the SOC rules, including immediate reporting of any potential or known violation to the SOC Office at soc@bpa.gov.

G. Marketing Function Employees (MFEs)

1. Make the SOC Office aware if they receive or become privy to any SOC-Restricted Information.
2. Contact the SOC Office for approval prior to scheduling meetings that include both MFEs and TFEs. Use appropriate SOC disclaimers on all joint MFE/TFE meeting documentation, meeting invites and emails.
3. Do not attend meetings with TFEs unless prior approval has been granted by the SOC Office.
4. Do not enter any secured Transmission Provider area without preapproval from SOC and an appropriate escort.
5. Use the ESC Occupation joint mail list to notify the SOC Office and TFEs when the Emergency Scheduling Center (ESC) will be occupied by MFEs.

H. Office of General Counsel (OGC), Transmission: Interprets the SOC requirements and provides guidance to the SOC Office.

I. SOC Office

1. Provides guidance to the HR Service Centers Classification unit to assign the SOC designations to federal employees position descriptions while completing the classification processes.
2. Provides guidance to the Supplemental Labor Management Office (SLMO) to assign SOC designations to contract personnel.

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3. Maintains oversight of all SOC designations.
4. Maintains the online SOC training module and materials.
5. Tracks training completions.
6. Distributes training to TFEs, MFEs, supervisors, officers, and directors annually and tracks training completion.
7. Reviews BPA's external SOC website and OASIS to ensure posting requirements are met.
8. Posts voluntary consents and waivers to the external website and to OASIS.
9. Performs overall administration of BPA's SOC compliance program.
10. Monitors the SOC inbox to answer questions and provide guidance on SOC issues.
11. Manages ongoing compliance monitoring, oversight, and determinations regarding SOC requirements consistent with guidance from OGC.
12. Handles all external questions or inquiries regarding BPA's SOC program.

J. Supplemental Labor Management Office (SLMO)

1. Distributes SOC training to new contract workers by including the SOC New Employee training on the online required training list.
2. Ensure that new contract workers complete SOC training within their first 30 days of employment.
3. Ensure that contract workers who are required to complete annual SOC training do so by the due date established by the SOC Office.
4. Assigns SOC designations to contract workers.

K. Transmission Function Employees (TFEs)

1. Provide a record of all business-related interactions (including e-mails and telephone conversations) with MFEs to the SOC Office.
2. Review systems and site permissions regularly to ensure MFEs do not have access to SOC-restricted information.
3. Contact the SOC Office for approval prior to scheduling meetings that include both MFEs and TFEs. Use appropriate SOC disclaimers on all joint MFE and TFE meeting documentation, meeting invites and emails.
4. Follow the non-discrimination requirements and do not provide any transmission customer, including BPA's Marketing Function, an undue preference or advantage.
5. Use the ESC Occupation joint mail list to notify the SOC Office and MFEs when the Emergency Scheduling Center (ESC) will be occupied by TFEs.

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- L. **Transmission Reservation Desk (within the Transmission Marketing and Sales Organization):** Posts SOC-related notices to BPA’s OASIS when requested to do so by the SOC Office.
- M. **Transmission Services (TS) Web Content Team (within Transmission Marketing and Sales):** Makes updates to the external SOC site when requested to do so by the SOC Office. For any changes or updates not requested by the SOC Office, TS Web Content will meet with or notify the SOC Office for concurrence.
- N. **SharePoint Site Content Owners, Outlook Owners, and Information Owners:** SharePoint site Content Owners, Outlook distribution list owners, Outlook shared mailbox owners, electronic information system Information Owners, and other software and site administrators must update permissions and lists accordingly to safeguard information.
- O. **TTOM Process Support and Management (PSM) Team:** The PSM Team in the Transmission Technology Ops Monitor, Analyze Process organization (TTOM) modifies card key access so that MFEs cannot access the Dittmer building or the transmission scheduling rooms in the Munro building.

8. Standards & Procedures

The SOC Office is the main point of contact for any questions related to BPA’s SOC program and how SOC is implemented at BPA. Any questions or requests for information should be sent to soc@bpa.gov. Additional procedures and guidance for BPA staff are available on the FERC SOC webpage.

BPA implements the Standards of Conduct through the following procedures:

Independent Functioning Rule

- A. All BPA employees and contractors are given an SOC designation upon hiring to identify them as an MFE, TFE or UE for the purposes of implementing the Standards of Conduct.
- B. MFEs and TFEs are physically separated in different facilities and MFEs are prohibited from accessing TFE facilities or systems that other customers cannot access. BPA has physical and cyber safeguards in place, and these are periodically spot-checked by the SOC Office.
- C. MFEs are prohibited from conducting transmission functions and TFEs are prohibited from conducting marketing functions.

No-Conduit Rule

- A. BPA requires new hire SOC training to be taken within 30 days of employment and annual training to be completed for all transmission function employees, marketing function employees, officers, supervisors, managers, and any other employees likely to

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become privy to transmission function information. The SOC Office tracks employee training completions and reports training stats to the Chief Compliance Officer.

- B. Employees must contact the SOC Office for approval for any joint MFE and TFE meetings, discussions, emails, or other joint correspondence.

Transparency Rule

- A. All employees have a duty to report any suspected or known violation of the Standards of Conduct to the SOC Office at soc@bpa.gov immediately. The SOC Office will conduct an investigation and, if a violation is found, will post a notice on OASIS.
- B. BPA posts a notice on its OASIS for any employees transferring from an MFE to a TFE position or TFE to MFE position within 7 days of the change, including the name of the transferring employee, the respective job titles held while performing each function, and the effective date of the transfer. The SOC Office works with managers, facilities personnel, and HR to ensure that physical and system access changes are updated. Under no circumstances may the transferring employee be a conduit of transmission, marketing, or customer information between the Transmission Providers and Marketing Affiliates.
- C. BPA posts any Voluntary Consents or Waivers on its public facing website and posts a notice on its OASIS.
- D. In the event an emergency, such as an earthquake, flood, fire, or risk of human life, severely disrupts BPA's normal business operations, the Senior Dispatcher on duty will make the final determination for emergency suspensions and the degree to suspend SOC requirements. The Senior Dispatcher will notify the SOC Office and the Chief Compliance Officer as soon as is practicable. A contemporaneous record of the non-public transmission function information exchanged with MFEs must be made during the emergency or as soon as is practicable after the fact. The record may consist of recorded telephone exchanges, handwritten or typed notes, electronic records such as e-mails or text messages, and the like. These records must be retained for five (5) years. A posting will be made to OASIS of the SOC suspension as soon as is feasible after the fact. Suspension of SOC does not apply to emergency drills where non-public transmission function information is used for the drill.

9. Performance & Monitoring

- A. The SOC Office tracks compliance with this policy through ongoing compliance monitoring and spot checks and maintains the SOC inbox (soc@bpa.gov) to handle questions or concerns regarding SOC.
- B. The SOC Office measures the effectiveness of this policy by analyzing actual violations, areas of risk of violation, and the volume of meeting and interaction requests and records it receives.

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10. Authorities & References

- A. FERC Order No. 717 (codified at 18 C.F.R. §part 358, Chapter 1, Title 18, Code of Federal Regulations).
- B. Dispatcher Standing Order 137
- C. [External BPA Standards of Conduct Page](#)
- D. [Internal Standards of Conduct Page](#) on BPA Connection (BPA's internal website)

11. Review

This policy is reviewed if FERC enacts changes to the SOC rules. This policy is subject to an automatic sunset review to be conducted no later than July 2028, but will also be periodically reviewed and updated prior to that date if needed.

12. Revision History

Version Number	Issue Date	Brief Description of Change or Review
1.0	9/7/2017	Initial publication as BPA Policy. This was approved by the Deputy Administrator, Dan James, on behalf of the vacant EVP Compliance, Audit and Risk position. The EVP CAR owns this policy.
1.1	8/23/2018	<ul style="list-style-type: none">Federal employee SOC designation management duties are streamlined by eliminating duplicative functions. The SOC Office no longer does this. The need for managers and supervisors to submit SOC designation change request forms is eliminated.Typo, formatting and grammar corrections. These are minor and administrative revisions. The policy's effective date is not updated.
2.0	6/20/2023	<ul style="list-style-type: none">Removed description of the OACC steering committee, as it was dissolved in FY20 due to changes in BPA's OATT oversight program.Revised policy to provide clarity.Publication
3.0	2/26/2025	<ul style="list-style-type: none">Aligned with EO

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