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**MOUNTAINWEST PIPELINE, LLC**  
**MOUNTAINWEST OVERTHRUST PIPELINE, LLC**  
**WHITE RIVER HUB, LLC**

**Written Procedures Pursuant to Order Nos. 717, et seq., and Part 358 of  
the FERC Regulations**

**January 19, 2024**

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**I. Introduction and Definitions**

In its Order Nos. 717, et seq., (“Order No. 717”) issued in Docket Nos. RM07-1-000, et al., “Standards of Conduct for Transmission Providers,” the Federal Energy Regulatory Commission (“FERC” or “Commission”) revised its Standards of Conduct regulations that govern the relationship between an interstate natural gas pipeline that transports gas for others pursuant to Subparts B or G of Part 284 of the Commission’s regulations (“Transmission Provider”) and its affiliate that engages in Marketing Functions and conducts Transmission Transactions with the Transmission Provider.

MountainWest Pipeline, LLC; MountainWest Overthrust Pipeline, LLC and White River Hub, LLC are “Transmission Providers” as defined in section 358.3(k)(2) of the Standards of Conduct.

**Definitions**

Capitalized terms in these Procedures have the following meanings. Other capitalized terms used but not defined herein shall have the meaning given such terms in section 358.3 of the Standards of Conduct.

**Affiliate**

Means an entity that controls or is controlled by or is under common control (10 percent or more) with such entity, including a division that operates as a functional unit. “Control” means the direct or indirect authority, whether acting alone or in conjunction with others, to direct or cause to direct the management policies of the Affiliate.

**Marketing Functions:**

Defined in section 358.3(c)(2) as the sale for resale in interstate commerce, or the submission of offers to sell in interstate commerce, natural gas, subject to the following exclusions: 1) bundled retail sales; 2) incidental purchases or sales to operate interstate natural gas pipeline transmission facilities; 3) sales of natural gas solely from a seller’s own production; 4) sales of natural gas solely from a seller’s own gathering or processing facilities; or 5) on- system sales by an intrastate natural gas pipeline, by a Hinshaw interstate pipeline exempt from the Natural Gas Act, by a local distribution company, or by a local distribution company operating under 7(f) of the Natural Gas Act.

**Marketing Function Employee (MFE)**

Defined in section 358.3(d) as 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.

### **Non-Public Transmission Function Information**

Transmission Function Information is defined in section 358.3 (j) as information relating to Transmission Functions, as defined below. Non-Public Transmission Function Information is all Transmission Function information that is not otherwise also available to the public without restriction, or the Internet Website, as applicable. This can include, but is not limited to, past, present, and future information about transmission maintenance schedules, transmission customer information, curtailments of transmission service, available transmission capacity, including storage, transmission service requests and request status, transmission service pricing offers, transmission outages, and certain expansion plans.

### **Standards of Conduct**

Defined as the rules governing the relationship between Transmission Function Employees and Marketing Function Employees as established by FERC in Order No. 717, Standards of Conduct for Transmission Providers.

### **Transmission**

Defined in section 358.3 (f) as natural gas transportation, storage, exchange, backhaul, or displacement service provided pursuant to subparts B or G of Part 284 of FERC's regulations.

### **Transmission Customer**

Defined in section 358.3 (g) as any eligible customer, shipper, or designated agent that (1) can or does execute a transmission service agreement or (2) can or does receive transmission service, including persons with pending requests for transmission service or information regarding transmission.

### **Transmission Functions**

Defined in section 358.3 (h) as 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 (TFE)**

Defined in section 358.3 (i) as 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 Provider**

Defined in section 358.3 (k)(2) as any interstate natural gas pipeline that transports gas for others pursuant to subparts B or G of Part 284 of the Commission's regulations.

Section 358.7(d) of the Standards of Conduct requires that a Transmission Provider post on its Internet website current written procedures implementing the Standards of Conduct. The following procedures have been adopted by Transmission Providers MountainWest Pipeline, LLC; MountainWest Overthrust Pipeline, LLC and White River Hub, LLC to comply with the Standards of Conduct promulgated pursuant to FERC Order No. 717.

## **II. Non-Discrimination Requirements**

The Transmission Provider will comply with the requirements section 358.4(a)-(d) of the Standards of Conduct. The Transmission Provider must treat all Transmission Customers, whether affiliated or not, on a not unduly discriminatory basis, and must not make or grant any undue preference or advantage to any person or subject any person to any undue prejudice or disadvantage with respect to the sale or purchase of Transmission service.

- A. The Transmission Provider will strictly enforce all tariff provisions relating to the sale or purchase of open access Transmission service if these tariff provisions do not permit the use of discretion.
- B. The Transmission Provider will apply all tariff provisions relating to the sale or purchase of open transmission service in a fair and impartial manner that treats all Transmission Customers in a non-discriminatory manner if the tariff provisions permit the use of discretion.
- C. The Transmission Provider may not, through its tariff or otherwise, give undue preference to any person in matters relating to the sale or purchase of transmission service (included issues of price, curtailment, scheduling, priority, ancillary services, or balancing).
- D. The Transmission Provider will process all similar requests for transmission service in the same manner and within the same period of time.

### **III. Independent Functioning Rule**

As defined in section 358.5 (a) of the Standards of Conduct, except as described in Parts III.A and V.H below, the Transmission Provider's Transmission Function Employees shall function independently of its Marketing Function Employees.

As defined in section 358.5 (b)(1)(i) and (2) of the Standards of Conduct, Marketing Function Employees will not conduct Transmission Functions and the Transmission Function Employees will not conduct Marketing Functions.

Unless otherwise indicated on the Transmission Provider's website, the respective work areas of Transmission Provider's TFEs and MFE are not located in the same facility. Transmission Provider will post on its website, under the Shared Facilities subheading, the type and address of any facility in which both TFEs and MFEs work areas are located. As provided in section 358.5 (b)(1)(ii) no MFE will have access to the Transmission Provider's gas control or system operations centers, or any similar Transmission Provider facilities used for day-to-day transmission operations or reliability functions that differs in any way from the access available to other Transmission Customers. Access to these facilities will be restricted by cardkey or other appropriate means on a 24- hour basis.

#### **A. Transmission Function Employees**

At this time, The Williams Companies, Inc. ("Williams") has determined that the Transmission Provider does not have any employees that actively and personally engage on a day-to-day basis in a Marketing Function and, therefore, Transmission Provider has no MFEs. Williams has identified certain employees of the Transmission Provider and certain employees in functional areas of Williams that support the Transmission Provider and perform Transmission Functions who have been designated as TFEs, and whose job titles and job descriptions will be posted on the Transmission Provider's website.

#### **B. Marketing Function Employees**

The Williams MFEs that actively and personally engage on a day-to-day basis in Marketing Functions (which is defined as excluding the activities set forth in section 358.3(c)(2)(i)-v) are employed by Sequent Energy Management LLC

#### **IV. No Conduit Rule**

The Transmission Provider will observe the no-conduit rule as required by section 358.6 of the Standards of Conduct. The transmission provider is prohibited from using anyone as a conduit for the disclosure of Non-Public Transmission Function Information to its Marketing Function Employees. The no-conduit rule will apply to all Williams employees and to those of its subsidiaries and Affiliates, and to any contractor, consultant or agent of Williams and its subsidiaries and Affiliates. The Transmission Provider has accordingly implemented policies and procedures to assure that it will not use anyone as a conduit for the disclosure of non-public Transmission Function Information to its Marketing Function Employees. The Transmission Provider provides training on this “No-Conduit Rule” to these employees in order to assure compliance with these requirements. Transmission Provider also requires each of these persons to certify electronically that they have completed the required training.

#### **V. Transparency Rule**

##### **A. Contemporaneous Disclosure**

As required by section 358.7(a)(1) of the Standards of Conduct, in the event nonpublic Transmission Function Information, other than information identified in the next sentence of this paragraph, is disclosed in a manner contrary to the requirements of section 358.6 (the No-conduit Rule which is discussed in Part IV above), then the Transmission Provider will immediately post the information that was disclosed on its Internet website. As required by section 358.7(a)(2), in the event non-public Transmission Customer information, critical energy infrastructure information or any other information that the Commission by law has determined is to be subject to limited dissemination is disclosed in a manner contrary to the requirements of section 358.6, the Transmission Provider will immediately post notice on its Internet website that the information was disclosed. The requirement to contemporaneously disclose does not apply to information covered by section 358.7(b), relating to a specific request for Transmission service by a Marketing Function Employee, which is discussed in Part V.B below.

##### **B. Exclusion for Specific Transaction Information**

As permitted by section 358.7(b) of the Standards of Conduct, the Transmission Provider is not required to contemporaneously disclose information otherwise covered by 358.6 if the information relates solely to a Marketing Function Employee’s specific request for Transmission service.

##### **C. Voluntary Consent**

As permitted by section 358.7(c) of the Standards of Conduct , in the event a Transmission Customer (whether affiliated or non-affiliated with the Transmission Provider) gives the Transmission Provider its voluntary consent, in writing, to allow the Transmission Provider to disclose the Transmission Customer’s non-public information to Williams Marketing Function Employees, then the Transmission Provider will post notice on its Internet website of the Transmission Customer’s consent along with a statement that the Transmission Provider did not provide any preferences, either operational or rate-related, in exchange for the voluntary consent.

D. Written Procedures

As required by section 358.7(d) of the Standards of Conduct, the Transmission Provider will post on its Internet website the current procedures it has implemented to ensure compliance with the Standards of Conduct.

E. Identification of Affiliate Information

(1) Names and Addresses

As required by section 358.7(e)(1) of the Standards of Conduct, the Transmission Provider identifies on its Internet website all of its Affiliates that employ or retain Marketing Function Employees. The Corporate Secretary for Williams will notify the Williams FERC Compliance Officer of any company that is being formed or acquired by any entity of Williams so that a determination can be made as to whether such company employs Marketing Function Employees, requiring an update to the posted Affiliate information. In addition, the Corporate Secretary will notify the Williams FERC Compliance Officer of any company that employs Marketing Function Employees that is being sold or dissolved so that the posted Affiliate information can be updated accordingly.

(2) Shared Facilities

As required by section 358.7(e)(2) of the Standards of Conduct, the Transmission Provider will post on its Internet website a complete list of the employee-staffed facilities shared by any of the Transmission Function's Transmission Function Employees and any Marketing Function Employees, including the types of facilities shared and the addresses of the facilities. The Williams FERC Compliance Officer will be responsible for making sure that the posted information is updated within seven business days of any change.

(3) Mergers

As required by section 358.7(e)(3) of the Standards of Conduct, the Transmission Provider will post information concerning potential merger partners as Affiliates that may employ or retain Marketing Function Employees, within seven days after the potential merger is announced. The Corporate Secretary of Williams will notify the Williams FERC Compliance Officer at the same time a potential merger is publicly announced. The Williams FERC Compliance Officer will then notify the Transmission Provider to post the required information.

F. Identification of Employee Information

(1) Job Titles and Job Descriptions

As required by section 358.7(f)(1) of the Standards of Conduct, the Transmission Provider will post on its Internet website the job titles and job descriptions of its Transmission Function Employees.

(2) Employee Transfers

As required by section 358.7(f)(2) of the Standards of Conduct, notice of any transfer of a Transmission Function Employee to a position as a Marketing Function Employee, or any transfer of a Marketing Function Employee to a position as a Transmission Function Employee will be posted on the Transmission Provider's Internet website. The information to be posted will include the name of the transferring employee, the respective titles held while performing each function and the effective date of the transfer. The information will be posted for 90 days.

G. Timing and General Requirements of Postings

The Transmission Provider will update on its Internet website the information required by Part 358 within seven business days of any change unless a different posting time frame is specified by the regulations and will post the date on which the information was updated. All Internet website postings required by Part 358 will be sufficiently prominent as to be readily accessible. In the event an emergency, such as an earthquake, flood, fire or hurricane, severely disrupts the Transmission Provider's normal business operations, the posting requirements under Part 358 may be suspended by the Transmission Provider. If the disruption lasts longer than one month, the Transmission Provider will notify the Commission and may seek a further exemption from the posting requirements.

H. Exclusion for and recordation of certain information exchanges

As permitted by section 358.7(h) of the Standards of Conduct, notwithstanding the requirements of sections 358.5(a) and 358.6 (the Independent Functioning and No Conduit Rule, respectively, as discussed in Parts III and IV, respectively, above), the Transmission Provider Transmission Function Employees and Williams Marketing Function Employees may exchange certain non-public Transmission Function Information necessary to maintain or restore operation of the Transmission system. The Transmission Provider will make and retain a contemporaneous record of all such exchanges except in emergency circumstances. In the case of an emergency, the Transmission Provider will make a record of the exchange as soon as practicable after the fact. The Transmission Provider shall make the record available to the Commission upon request. The Transmission Provider's Gas Control and Customer Services are responsible for ensuring that records of any information exchange under this exclusion are prepared and maintained for a period of five years.

I. Posting of Waivers

As required by section 358.7(i) of the Standards of Conduct, the Transmission Provider will post on its Internet website notice of each waiver of a tariff provision that it grants in favor of an Affiliate, unless such waiver has been approved by the Commission. The posting will be made within one business day of the act of a waiver. The Transmission Provider will also maintain a log of the acts of waiver granted in favor of an Affiliate and make it available to the Commission upon request. The records will be kept for a period of five years from the date of each act of waiver. The Transmission Provider Manager who authorizes a waiver will be responsible for ensuring that a waiver of a tariff provision that the Transmission Provider grants in favor of an Affiliate is posted within one business day of the act of a waiver and is included in the log.

## **VI. Implementation Requirements.**

### **A. Compliance Measures and Written Procedures:**

As required by section 358.8(b)(1) and (2) of the Standards of Conduct, the Transmission Provider has implemented procedures to ensure that the requirements of sections 358.5 and 358.6 are observed by its employees and by the employees of its Affiliates, which are described in Parts III and IV above. The Williams FERC Compliance Officer will distribute an electronic copy of these compliance procedures to all Transmission Function Employees, Marketing Function Employees and all other officers, directors, supervisory employees, and any other employees likely to become privy to Transmission Function Information. In addition, Williams has adopted a Policy addressing the Standards of Conduct Compliance Plan, which states, among other things, the following: "Employees who violate any provision of this policy will be subject to disciplinary action, up to and including termination. For any disciplinary action taken, there will be a notation of the same placed in the employee's personnel file that will reflect the incident and the disciplinary action taken."

### **B. Training:**

Williams will provide annual training on the Standards of Conduct for all Transmission Function Employees of the Transmission Provider and all other officers, directors, supervisory employees, and any other employees likely to become privy to the Transmission Provider's Transmission Function Information. All trained employees will certify that they have been trained on the Standards of Conduct as required by section 358.8(c)(1) of the Standards of Conduct. Those employees that are on disability or administrative leave will not be trained unless and until they resume full time active employment in which case, they will be trained within the time frame for new hires.

The Standards of Conduct training will primarily be computer based and provided through the Williams Workday system. Completion of the training by each employee will be tracked and monitored by the Williams FERC Compliance Officer or her designee.

Newly hired Transmission Function Employees of the Transmission Provider, Marketing Function Employees, officers, directors, supervisory employees, and any other newly hired employees likely to become privy to Transmission Function Information will complete the training within 30 days of the effective date of their employment.

Employees or contractors who have access to any non-public Transmission Function Information through a FERC identified component must complete the Standards of Conduct training module within 30 days of their start date or must complete the Standards of Conduct training module within 30 days of being granted access to the FERC identified component. A "FERC identified component" is any Transmission Provider component (application, application's sub-components, system, or database) that contains any non-public Transmission Function Information. Williams' Board of Directors will receive Standards of Conduct training at one of the designated meetings for the Board.

C. Compliance Officer:

As required by section 358.8(c)(2) of the Standards of Conduct, Williams has designated Nick Baumann, a corporate employee, as the Williams FERC Compliance Officer. The contact information for Mr. Baumann is set for the below and posted on the Transmission Provider's Internet website:

Nick Baumann  
2800 Post Oak Blvd  
Level 12  
Houston, Texas  
713-215-3383 – office phone  
281-714-7056 – cell phone

In certain circumstances, the Williams FERC Compliance Officer may designate others as having responsibility for certain functions, such as IT-Security for computer access control.

Employees should report any concerns immediately to your supervisor, to the Williams FERC Compliance Officer, the Legal Department, or by calling the Williams Action Line at 1-800-324-3606 or online at [www.williams.ethicspoint.com](http://www.williams.ethicspoint.com). The Williams Action Line is operated by an independent third party to ensure confidentiality and is available 24 hours a day, 7 days a week, and you can remain anonymous if you choose.

D. Books and Records

The Transmission Provider will maintain its books of accounts and records separately from those Affiliates that employ or retain Marketing Function Employees as required by section 358.8(d) of the Standards of Conduct.

**Appendix A**

Transmission Provider  
Website Addresses

MountainWest Pipeline, LLC <https://www.mwpipe.com/>

Mountainwest Overthrust, LLC <https://www.mwpipe.com/indexOTP.php>

White River Hub, LLC <https://www.whiteriverhub.com/>