

**Document Name:** Standards of Conduct Rule

**Company:** Avangrid, Inc. and subsidiaries

**Date:** April 30, 2019

**Purpose:** These rules establish the standards of conduct for affiliated transactions and the sharing of transmission function information.

**Owner:** General Counsel – Avangrid, Inc.

**Updating Document:** The Owner shall review and update these rules as necessary. The initial Document and any substantive changes to the Document must be reviewed by the AVANGRID Corporate Secretary Department and approved by the applicable company's General Counsel. The date of review and approval will be noted in the table below.

• **Avangrid, Inc.**

| Acknowledger<br>Corporate Secretary<br>Signature | Acknowledged<br>Date | Approver<br>Signature | Approval<br>Date | Version |
|--|----------------------|-----------------------|------------------|---------|
| R. S. A. Mahoney                                 | 04/11/2018           | R. S. A. Mahoney      | 04/11/2018       | V.1     |
| R. S. A. Mahoney                                 | 10/01/2018           | R. S. A. Mahoney      | 10/01/2018       | V.2     |
| R. S. A. Mahoney                                 | 04/25/2019           | R. S. A. Mahoney      | 04/30/2019       | V.3     |

• **Avangrid Networks, Inc.**

| Acknowledger<br>Corporate Secretary<br>Signature | Acknowledged<br>Date | Approver<br>Signature | Approval<br>Date | Version |
|--|----------------------|-----------------------|------------------|---------|
| Chelle A. Finzel                                 | 04/26/2018           | Chelle A. Finzel      | 04/26/2018       | V.1     |
| Chelle A. Finzel                                 | 10/09/2018           | Chelle A. Finzel      | 10/09/2018       | V.2     |
| Chelle A. Finzel                                 | 04/30/2019           | Chelle A. Finzel      | 04/30/2019       | V.3     |





• **Avangrid Renewables, LLC**

| Acknowledger<br>Corporate Secretary<br>Signature | Acknowledged<br>Date | Approver<br>Signature | Approval<br>Date | Version |
|--|----------------------|-----------------------|------------------|---------|
| Chelle A. Finzel                                 | 04/19/2018           | Chelle A. Finzel      | 04/19/2018       | V.1     |



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Printed in black and white and only if necessary.



|   |            |   |            |     |
|---|------------|---|------------|-----|
|  | 10/08/2018 |  | 10/08/2018 | V.2 |
|  | 04/25/2019 |  | 04/30/2019 | V.3 |

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## 1. PURPOSE

Avangrid, Inc. and its subsidiaries (“**Company**”) are subject to affiliate transactions rules established by state and federal regulatory agencies (“standards of conduct”). This *Avangrid Standards of Conduct Rule* (“**Rule**”) serves as a resource for complying with the standards of conduct applicable to the Company’s businesses in Connecticut, Maine, Massachusetts, and New York. In general, the state standards of conduct regulate the separation of the Company’s regulated utilities from unregulated generating, marketing, and energy services businesses,<sup>1</sup> and the FERC standards of conduct regulate the access and sharing of transmission system information.

## 2. SCOPE

All interactions among the Company must comply with this Rule.

## 3. RULE REQUIREMENTS

### 3.1 Compliance

All employees and representatives of the Company are required to comply with the applicable standards of conduct set forth in the attached Exhibits A, B, C, D, and E as amended.

Employees should direct questions regarding compliance with this Rule to their supervisor, the Legal Department, or the Compliance Division.

### 3.2 Certain Sections of the Rule

Employees should contact the Legal Department or the Compliance Division for guidance when needed. In addition, when Company activities are related to the following activities, employees should always consult the Legal Department:

- Sharing of non-public customer, market-related or transmission function information.
- Sharing non-public electric or gas pipeline network development and operation information.
- Proposed employee sharing, assignments or transfers.
- Avangrid Renewables development and operation activities within Avangrid Networks subsidiaries’ service territories.

### 3.3 Compliance

Agendas and minutes of joint Networks/Renewables meetings that could include non-public Networks project/operations or non-public Renewables New York or New England projects/operation information should include this notice:


#### **Joint Networks and Renewables Standards of Conduct Disclaimer**

**(Last Revised 10/1/2018)**

This is an Avangrid meeting including Networks and Renewables managers. We will not discuss specific non-public Networks Transmission projects/operations or specific Renewables New York or New England projects/operations, including information concerning the planning, directing, organizing, or carrying out of day-to-day transmission operations, including the granting and denying of transmission

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<sup>1</sup> The Connecticut Standards of Conduct also regulate the separation of gas and electric companies.

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service requests. Any transgressions should be clearly identified and noted in the minutes of this meeting and appropriately posted on the Networks OASIS site.

Agendas and minutes of joint meetings between Networks transmission and marketing function employees should include this notice:

### **Joint Transmission and Marketing Standards of Conduct Disclaimer**

**(Last Revised 10/1/2018)**

This meeting includes Avangrid Transmission Function employees and Marketing Function employees. We will not discuss specific non-public transmission projects/operations, including information concerning the planning, directing, organizing, or carrying out of day-to-day transmission operations, including the granting and denying of transmission service requests. Any transgressions should be clearly identified and noted in the minutes of this meeting and appropriately posted on the Avangrid Networks OASIS site.

## **4. EXHIBITS**

### **Exhibit A: New York Standards of Conduct (last confirmed 29-April 2019)**

Case 07-M-0906: Standards Pertaining to Affiliates and the Provision of Information, Schedule 1: Cost Allocation Guidelines for Affiliate Transactions, Schedule II: Interlocking Officers and Directors, and Attachment A: Iberdrola/Avangrid Affiliate Provided Goods and Services to NY Utilities

### **Exhibit B: Maine Standards of Conduct (last confirmed 29 April 2019)**

65-407 Ch. 308: Standards of Conduct for Transmission and Distribution Utilities and Affiliated Generators and CMP Compliance Policy and Implementation Plan Regarding Standards of Conduct for Transmission

and Distribution Utilities and Affiliated Generators

### **Exhibit C: Connecticut Standards of Conduct (last confirmed 29 April 2019)**

PURA Reg. 16-244h-1 to 7-: Code of Conduct for Electric Distribution Companies  
PURA Reg. 16-47a-1 to -12: Gas Code of Conduct

### **Exhibit D: Massachusetts Standards of Conduct (last confirmed 29 April 2019)**

220 CMR 12.00: Standards of Conduct for Distribution Companies and their Affiliates

### **Exhibit E: FERC Standards of Conduct (last confirmed 29 April 2019)**

CMP, MEPCO, NYSEG, RGE, & UI Compliance Policy and Plan With FERC Standards of Conduct and Related Requirements, pursuant to 18 C.F.R. pt. 358