

**PACIFIC GAS AND ELECTRIC COMPANY
STANDARDS OF CONDUCT FOR TRANSMISSION PROVIDERS**

Pacific Gas and Electric Company (PG&E) hereby adopts the Standards of Conduct for Transmission Providers set forth by the Federal Energy Regulatory Commission (FERC or Commission), as those standards may change from time to time¹. A current copy of such Standards of Conduct, adopted in Order No. 717 (RM07-1-000 *et seq.*) and as set forth in 18 C.F.R. § 358.1 *et seq.*, is provided below.

PART 358—STANDARDS OF CONDUCT

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Authority: 15 U.S.C. 717–717w, 3301–3432; 16 U.S.C. 791–825r, 2601–2645; 31 U.S.C. 9701; 42 U.S.C. 7101–7352.

¹ The amendments to the Commission’s regulations promulgated by Order No. 717 replace existing Standards of Conduct for Transmission Providers (Order No. 2004, RM01-10-000 *et seq.*).

§ 358.1 Applicability.

(a) This part applies to any interstate natural gas pipeline that transports gas for others pursuant to subparts B or G of part 284 of this chapter and conducts transmission transactions with an affiliate that engages in marketing functions.

(b) This part 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.

(c) This part does not apply to a public utility transmission provider that is a Commission-approved Independent System Operator (ISO) or Regional Transmission Organization (RTO). If a public utility transmission owner participates in a Commission-approved ISO or RTO and does not operate or control its transmission system and has no access to transmission function information, it may request a waiver from this part.

(d) A transmission provider may file a request for a waiver from all or some of the requirements of this part for good cause.

§ 358.2 General principles.

(a) A transmission provider must treat all transmission customers, affiliated and non-affiliated, 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 any transportation of natural gas or transmission of electric energy

in interstate commerce, or with respect to the wholesale sale of natural gas or of electric energy in interstate commerce.

(b) A transmission provider's transmission function employees must function independently from its marketing function employees, except as permitted in this part or otherwise permitted by Commission order.

(c) 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 to the transmission provider's marketing function employees.

(d) A transmission provider must provide equal access to non-public transmission function information to all its transmission function customers, affiliated and non-affiliated, except in the case of confidential customer information or Critical Energy Infrastructure Information.

§ 358.3 Definitions.

(a) Affiliate of a specified entity means:

(1) Another person that controls, is controlled by or is under common control with, the specified entity. An affiliate includes a division of the specified entity that operates as a functional unit.

(2) For any exempt wholesale generator (as defined under § 366.1 of this chapter), affiliate shall have the meaning set forth in § 366.1 of this chapter, or any successor provision.

(3) “Control” as used in this definition means the direct or indirect authority, whether acting alone or in conjunction with others, to direct or cause to direct the management policies of an entity. A voting interest of 10 percent or more creates a rebuttable presumption of control.

(b) Internet website refers to the Internet location where an interstate natural gas pipeline or a public utility posts the information, by electronic means, required under this part 358.

(c) Marketing functions means:

(1) in the case of public utilities and their affiliates, 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, all as subject to an exclusion for bundled retail sales, including sales of electric energy made by providers of last resort (POLRs) acting in their POLR capacity; and

(2) in the case of interstate pipelines and their affiliates, the sale for resale in interstate commerce, or the submission of offers to sell in interstate commerce, natural gas, subject to the following exclusions:

(i) Bundled retail sales,

(ii) Incidental purchases or sales of natural gas to operate interstate natural gas pipeline transmission facilities,

(iii) Sales of natural gas solely from a seller’s own production,

(iv) Sales of natural gas solely from a seller’s own gathering or processing facilities, and

v) Sales by an intrastate natural gas pipeline, by a Hinshaw interstate pipeline exempt from the Natural Gas Act, or by a local distribution company making an on-system sale.

(d) Marketing function employee means 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.

(e) Open Access Same Time Information System or OASIS refers to the Internet location where a public utility posts the information required by part 37 of this chapter, and where it may also post the information required to be posted on its Internet website by this part 358.

(f) Transmission means electric transmission, network or point-to-point service, ancillary services or other methods of electric transmission, or the interconnection with jurisdictional transmission facilities, under part 35 of this chapter; and natural gas transportation, storage, exchange, backhaul, or displacement service provided pursuant to subparts B or G of part 284 of this chapter.

(g) Transmission customer means any eligible customer, shipper or designated agent that can or does execute a transmission service agreement or can or does receive transmission service, including all persons who have pending requests for transmission service or for information regarding transmission.

(h) Transmission functions means the planning, directing, organizing or carrying out of day-to-day transmission operations, including the granting and denying of transmission service requests.

(i) Transmission function employee means an employee, contractor, consultant or agent of a transmission provider who actively and personally engages on a day-to-day basis in transmission functions.

(j) Transmission function information means information relating to transmission functions.

(k) Transmission provider means:

(1) Any public utility that owns, operates or controls facilities used for the transmission of electric energy in interstate commerce; or

(2) Any interstate natural gas pipeline that transports gas for others pursuant to subparts B or G of part 284 of this chapter.

(3) A transmission provider does not include a natural gas storage provider authorized to charge market-based rates.

(l) Transmission service means the provision of any transmission as defined in § 358.3(f).

(m) Waiver means the determination by a transmission provider, if authorized by its tariff, to waive any provisions of its tariff for a given entity.

§ 358.4 Non-discrimination requirements.

(a) A transmission provider must strictly enforce all tariff provisions relating to the sale or purchase of open access transmission service, if the tariff provisions do not permit the use of discretion.

(b) A transmission provider must apply all tariff provisions relating to the sale or purchase of open access transmission service in a fair and impartial manner that treats all transmission customers in a not unduly discriminatory manner, if the tariff provisions permit the use of discretion.

(c) A transmission provider may not, through its tariffs or otherwise, give undue preference to any person in matters relating to the sale or purchase of transmission service (including, but not limited to, issues of price, curtailments, scheduling, priority, ancillary services, or balancing).

(d) A transmission provider must process all similar requests for transmission in the same manner and within the same period of time.

§ 358.5 Independent functioning rule.

(a) General rule. Except as permitted in this part or otherwise permitted by Commission order, a transmission provider's transmission function employees must function independently of its marketing function employees.

(b) Separation of functions.

(1) A transmission provider is prohibited from permitting its marketing function employees to:

(i) Conduct transmission functions; or

(ii) 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.

(2) A transmission provider is prohibited from permitting its transmission function employees to conduct marketing functions.

§ 358.6 No conduit rule.

(a) A transmission provider is prohibited from using anyone as a conduit for the disclosure of non-public transmission function information to its marketing function employees.

(b) An employee, contractor, consultant or agent of a transmission provider, and an employee, contractor, consultant or agent of an affiliate of a transmission provider that is engaged in marketing functions, is prohibited from disclosing non-public transmission function information to any of the transmission provider's marketing function employees.

§ 358.7 Transparency rule.

(a) Contemporaneous disclosure.

(1) If a transmission provider discloses non-public transmission function information, other than information identified in paragraph (a)(2) of this section, in a manner contrary to the requirements of § 358.6, the transmission provider must immediately post the information that was disclosed on its Internet website.

(2) If a transmission provider discloses, in a manner contrary to the requirements of § 358.6, non-public transmission customer information, critical energy infrastructure information

(CEII) as defined in § 388.113(c)(1) of this chapter or any successor provision, or any other information that the Commission by law has determined is to be subject to limited dissemination, the transmission provider must immediately post notice on its website that the information was disclosed.

(b) Exclusion for specific transaction information. A transmission provider's transmission function employee may discuss with its marketing function employee a specific request for transmission service submitted by the marketing function employee. 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 provision. A transmission customer may voluntarily consent, in writing, to allow the transmission provider to disclose the transmission customer's non-public information to the transmission provider's marketing function employees. If the transmission customer authorizes the transmission provider to disclose its information to marketing function employees, the transmission provider must post notice on its Internet website of that consent along with a statement that it did not provide any preferences, either operational or rate-related, in exchange for that voluntary consent.

(d) Posting written procedures on the public Internet. A transmission provider must post on its Internet website current written procedures implementing the standards of conduct.

(e) Identification of affiliate information on the public Internet.

(1) A transmission provider must post on its Internet website the names and addresses of all its affiliates that employ or retain marketing function employees.

(2) A transmission provider must post on its Internet website a complete list of the employee-staffed facilities shared by any of the transmission provider's transmission function employees and marketing function employees. The list must include the types of facilities shared and the addresses of the facilities.

(3) The transmission provider must 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.

(f) Identification of employee information on the public Internet.

(1) A transmission provider must post on its Internet website the job titles and job descriptions of its transmission function employees.

(2) A transmission provider must post a notice on its Internet website 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. The information posted under this section must remain on its Internet website for 90 days. No such job transfer may be used as a means to circumvent any provision of this part. The information to be posted must include:

(i) The name of the transferring employee,

(ii) The respective titles held while performing each function (i.e., as a transmission function employee and as a marketing function employee), and

(iii) The effective date of the transfer.

(g) Timing and general requirements of postings on the public Internet.

(1) A transmission provider must update on its Internet website the information required by this part 358 within seven business days of any change, and post the date on which the information was updated. A public utility may also post the information required to be posted under part 358 on its OASIS, but is not required to do so.

(2) In the event an emergency, such as an earthquake, flood, fire or hurricane, severely disrupts a transmission provider's normal business operations, the posting requirements in this part may be suspended by the transmission provider. If the disruption lasts longer than one month, the transmission provider must so notify the Commission and may seek a further exemption from the posting requirements.

(3) All Internet website postings required by this part must be sufficiently prominent as to be readily accessible.

(h) Exclusion for and recordation of certain information exchanges.

(1) Notwithstanding the requirements of §§ 358.5(a) and 358.6, a transmission provider's transmission function employees and marketing function employees may exchange certain non-public transmission function information, as delineated in § 358.7(h)(2), in which case the transmission provider must make and retain a contemporaneous record of all such exchanges

except in emergency circumstances, in which case a record must be made of the exchange as soon as practicable after the fact. The transmission provider shall make the record available to the Commission upon request. The record may consist of hand-written or typed notes, electronic records such as e-mails and text messages, recorded telephone exchanges, and the like, and must be retained for a period of five years.

(2) The non-public information subject to the exclusion in § 358.7(h)(1) is as follows:

(i) Information pertaining to compliance with Reliability Standards approved by the Commission, and

(ii) Information necessary to maintain or restore operation of the transmission system or generating units, or that may affect the dispatch of generating units.

(i) Posting of waivers. A transmission provider must 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 must be made within one business day of the act of a waiver. The transmission provider must also maintain a log of the acts of waiver, and must make it available to the Commission upon request. The records must be kept for a period of five years from the date of each act of waiver.

§ 358.8 Implementation requirements.

(a) Effective date.

A transmission provider must be in full compliance with the standards of conduct on the date it commences transmission transactions with an affiliate that engages in marketing functions.

(b) Compliance measures and written procedures.

(1) A transmission provider must implement measures to ensure that the requirements of §§ 358.5 and 358.6 are observed by its employees and by the employees of its affiliates.

(2) A transmission provider must distribute the written procedures referred to in § 358.7(d) to all its transmission function employees, marketing function employees, officers, directors, supervisory employees, and any other employees likely to become privy to transmission function information.

(c) Training and compliance personnel.

(1) A transmission provider must provide annual training on the standards of conduct to all the employees listed in paragraph (b)(2) of this section. The transmission provider must provide training on the standards of conduct to new employees in the categories listed in paragraph (b)(2) of this section, within the first 30 days of their employment. The transmission provider must require each employee who has taken the training to certify electronically or in writing that s/he has completed the training.

(2) A transmission provider must designate a chief compliance officer who will be responsible for standards of conduct compliance. The transmission provider must post the name of the chief compliance officer and provide his or her contact information on its Internet website.

(d) Books and records. A transmission provider must maintain its books of account and records (as prescribed under parts 101, 125, 201 and 225 of this chapter) separately from those of its affiliates that employ or retain marketing function employees, and these must be available for Commission inspections.

**PACIFIC GAS AND ELECTRIC COMPANY (PG&E)
IMPLEMENTATION PROCEDURES FOR STANDARDS OF CONDUCT
18 C.F.R. § 358.1 *et seq.***

The following procedures implement FERC's Standards of Conduct for Transmission Providers adopted in Order No. 717 (RM07-1-000 *et seq.*) and as set forth in 18 C.F.R. § 358.1 *et seq.*¹

Section 358.1 Applicability

PG&E is a combined gas and electric utility and local distribution company that: (1) has transferred operational control over its electric transmission system to the California Independent System Operator Corporation (CAISO); (2) provides intrastate gas transportation and storage services; (3) procures and sells electricity, including making some wholesale sales; and (4) procures natural gas for sale to core customers and for use as fuel for electric generation. As a Participating Transmission Owner of the CAISO, PG&E has access to transmission information, but does not control access to or control the provision of transmission service on the interstate grid. PG&E's gas transmission pipeline is a state regulated intrastate pipeline that is not subject to FERC's Standards of Conduct. PG&E is a subsidiary of PG&E Corporation.

Section 358.2 General Principles

The procedures adopted herein are to ensure that:

(1) PG&E's employees engaged in transmission system operations ("Transmission Function" employees) function independently from employees engaged in marketing functions ("Marketing Function" employees); and

(2) PG&E treats all transmission customers, affiliated and non-affiliated, on a non-discriminatory basis.²

Section 358.3 **Definitions**

PG&E’s “Transmission Function” employees are located in the following departments: Electric Operations, Transmission Operations Engineering, (Transmission) Performance Improvement, Emergency Preparedness, and Generation Interconnection Services. PG&E’s “Marketing Function” employees are located in the Short-term Electric Supply department within the Energy Supply organization.

Section 358.4 **Non-discrimination requirements**

This section of the regulations, which relates to tariff provisions governing the provision of open access transmission service, is largely inapplicable to PG&E. PG&E has transferred operational control of its transmission system to the CAISO. As a Participating Transmission Owner of the CAISO, PG&E has access to certain transmission information but does not control access to or control the provision of transmission service on the interstate grid. The CAISO has the obligation to provide open access to the transmission system in a non-discriminatory manner under the CAISO tariff.

Section 358.5 **Independent Functioning**

² PG&E transferred operational control of its transmission system to the California Independent System Operator Corporation (CAISO) on March 31, 1998. The CAISO is obligated to provide open access to the transmission system to all eligible users in a non-discriminatory manner. *Pacific Gas and Electric Co., et al.*, 81 FERC ¶ 61,122 at 61,455 (1998).

(b) Separation of functions

Pursuant to a previous Commission Order on Standards of Conduct³ and as part of PG&E's transfer of operational control over its transmission system to the CAISO, PG&E reorganized its personnel to implement the functional separation of PG&E's Transmission Function and Marketing Function departments.

PG&E has instituted several security measures to limit physical access to PG&E's transmission system control center or similar facilities used for transmission operations or reliability functions. At PG&E's San Francisco headquarters, Transmission Function personnel do not share the same office space with Marketing Function personnel. PG&E has in place a card entry system that limits access to PG&E's Transmission Operating Center (TOC) located on the 15th floor, 77 Beale Street, San Francisco, California. In addition, any personnel entering the TOC must sign-in and be escorted to a location on the 15th floor. The security door access system prohibits access to the TOC by employees other than TOC employees and their support personnel. Card key access is also limited for all other Transmission Function departments to transmission function and their support personnel. Further, PG&E's computer system network is configured such that employees in PG&E's Marketing Function organization are not able to access protected transmission information. In addition, Transmission Function employees can not save protected transmission information to Marketing Function shared drives, and in most cases, do not have access to Marketing Function shared drives.

Section 358.6 No-conduit rule

³ 82 FERC ¶ 61, 246 (March 12, 1998).

PG&E's computer system network is configured such that employees in PG&E's Marketing Function department are not able to access protected transmission information. As a general matter, PG&E limits access to client servers and portions of PG&E's computer network via log-in names and passwords. Specifically, Marketing Function personnel cannot access protected transmission information or prohibited third-party information.

PG&E has reviewed all network and shared drives associated with Transmission Function Departments in order to determine that no Marketing Function employee has been given permission to access the Transmission Function network and shared drives. All future requests for access to Transmission Function network and shared drives will be reviewed by the Compliance and Ethics (C&E) department to ensure that Marketing Function employees are not given access to the Transmission Function network and shared drives.

PG&E has provided and will continue to provide training, including numerous face-to-face meetings with Transmission Function and Marketing Function employees, as well as other affected employees, to review in detail, the Standards of Conduct. PG&E will particularly provide information on the requirement that employees of the Transmission Provider not disclose to Marketing Function employees any transmission function information of the Transmission Provider or of third parties through non-public communications conducted off the PG&E website or OASIS, through access to information not posted on the website that is not contemporaneously available to the public, or through information on the website that is not at the same time publicly available.

Section 358.7 Transparency rule

(a) Contemporaneous disclosure

Upon discovering that any employee has disclosed information prohibited by the Standards of Conduct, PG&E will promptly post any confirmed disclosure on PG&E's Internet website. A violation of these Standards of Conduct may result in disciplinary action against the responsible PG&E personnel. Detailed posting procedures are contained in Attachment A.

(c) Voluntary consent provision

PG&E's procedure for posting voluntary consents under this section is contained in Attachment A.

(d) Posting written procedures on the public Internet

On January 30, 2009, PG&E posted its Plan for implementing the Standards of Conduct. This Plan has been posted to PG&E's Internet website at www.pge.com/transmissionownersforum/.

(e) Identification of affiliate information on the public Internet

The information required under § 358.7 (e) concerning PG&E's affiliates, list of shared facilities and, if applicable, potential merger partners, is posted on PG&E's Internet website at www.pge.com/transmissionownersforum/. The procedures for maintaining compliance with these posting requirements are set forth in Attachment A.

(f) Identification of employee information on the public Internet

The procedures for maintaining compliance with this Section are set forth in Attachment A.

(g) Timing and general requirements of postings on the public Internet

The procedures for maintaining compliance with this Section are set forth in Attachment A.

(h) Exclusion for and recordation of certain information exchanges

PG&E has provided training to Transmission Function and Marketing Function employees on the exclusions and simultaneous recordation requirements contained in Section 358.7(h). The simultaneous recordation requirement will be satisfied through the use of voice recordings or written records of any communication between Transmission Function and Marketing Function employee under this section. Such records shall be retained for a period of five years.

(i) Posting of waivers

The procedures for maintaining compliance with this Section are set forth in Attachment A.

Section 358.8 Implementation requirements

(b); (c) Compliance measures and written procedures/Training/Designation of Chief Compliance Officer

PG&E will train⁴ all of its Transmission Function and Marketing Function employees and all of its officers, directors and employees with access to transmission information. Each trained employee will either sign a document or certify electronically signifying that s/he participated in the training. Each trained employee is provided the electronic link to the Standards of Conduct and these Implementing Procedures. The Standards of Conduct and these Implementing Procedures have been posted to PG&E's Internet website at www.pge.com/transmissionownersforum/.

⁴ Training will include on-line training, provision of written materials, and, for certain employees in Transmission Function and Marketing Function organizations, additional face-to-face meetings to provide additional information and answer questions about the Standards of Conduct requirements as applied to real-life situations.

PG&E has designated Dinyar Mistry, Vice President, Chief Risk and Audit Officer of PG&E Corporation as PG&E's Chief Compliance Officer for the Standards of Conduct. Mr. Mistry may be reached at 245 Market Street, Mail Code N4B, San Francisco, CA 94105. PG&E also has in place a compliance department, the C&E department whose duties include oversight of compliance with, implementation of, and provision of training related to the Standards of Conduct. The C&E department may be reached at (415) 972-7272 or via email at arcinfo@pge.com.

(d) Books and records

Not applicable.

ATTACHMENT A

PG&E'S Procedures for Compliance with Order No. 717 Posting Requirements

FERC Order No. 717 18 C.F.R. Section Number	Posting Requirement	When	How Long	Procedures For Compliance
358.7(a)	If an employee of the Transmission Provider discloses non-public information to its Marketing Function employees, the Transmission Provider must immediately post such information on its Internet website.	This requirement is currently being implemented.	Information will remain on PG&E's Internet website for 90 days.	Any PG&E employee who believes s/he may have disclosed non-public transmission function information to Marketing Function employee(s), is to report the potential disclosure to C&E using the C&E helpline telephone number (415) 972-7272 or by email to "arcinfo@pge.com." C&E and Law Department will evaluate the report and determine if a prohibited disclosure has occurred. If so, C&E will post disclosure on PG&E's Internet website. A violation of these Standards may result in disciplinary action against the responsible PG&E personnel.

ATTACHMENT A

PG&E'S Procedures for Compliance with Order No. 717 Posting Requirements

FERC Order No. 717 18 C.F.R. Section Number	Posting Requirement	When	How Long	Procedures For Compliance
358.7(c)	If a transmission customer authorizes the Transmission Provider to disclose its non-public transmission information to the Transmission Provider's Marketing Function employees, the Transmission Provider must post notice on OASIS or its Internet website of that consent along with a statement that it did not provide any preferences, either operational or rate-related, in exchange for that voluntary consent.	This requirement is currently being implemented.	Information will remain on PG&E's Internet website until it is no longer required by FERC Order No. 717	Upon notice of third-party consents, the C&E and Law departments will review the consent and the C&E department will post such information on the PG&E's OASIS site.

ATTACHMENT A

PG&E'S Procedures for Compliance with Order No. 717 Posting Requirements

FERC Order No. 717 18 C.F.R. Section Number	Posting Requirement	When	How Long	Procedures For Compliance
358.7(d); 358.8(b); 358.8(c)	Each Transmission Provider is required to post on its Internet website, written procedures implementing the Standards of Conduct no later than January 30, 2009. The Transmission Provider must explain the measures they use to implement the standards of conduct, e.g., how transmission information and confidential customer information is kept secure, whether the standards of conduct have been distributed to employees, whether employees have been offered training on the standards of conduct, and whether employees are required to sign or certify electronically signifying that they have received training.	January 30, 2009	Information will remain on PG&E's Internet website until it is no longer required by FERC Order No. 717.	This step has been completed.

ATTACHMENT A

PG&E'S Procedures for Compliance with Order No. 717 Posting Requirements

FERC Order No. 717 18 C.F.R. Section Number	Posting Requirement	When	How Long	Procedures For Compliance
358.7(e)(1)	A Transmission Provider must post on its Internet website the names and addresses of all its affiliates that employ or retain marketing function employees.	By January 30, 2009.	Information will remain on PG&E's Internet website until it is no longer required by FERC Order No. 717.	The FERC compliance liaison in the Marketing Function department will inform C&E of any changes to this list and C&E will post changes within the 7 day limit.

ATTACHMENT A

PG&E'S Procedures for Compliance with Order No. 717 Posting Requirements

FERC Order No. 717 18 C.F.R. Section Number	Posting Requirement	When	How Long	Procedures For Compliance
358.7(e)(2)	Transmission Providers must post on its Internet website a complete list of the facilities shared by the Transmission Provider's Transmission Function employees and its Marketing Function employees, including the types of facilities shared and their addresses.	By January 30, 2009, and within 7 business days of any change thereafter.	Information will remain on PG&E's Internet website until it is no longer required by FERC Order No. 717.	A list of these facilities is available on the PG&E website. FERC compliance liaisons in Marketing and Transmission Function departments will provide any changes to C&E, and C&E will post any changes within the 7-day deadline. Currently, the Transmission Function and Marketing Function are in different locations.

ATTACHMENT A

PG&E'S Procedures for Compliance with Order No. 717 Posting Requirements

FERC Order No. 717 18 C.F.R. Section Number	Posting Requirement	When	How Long	Procedures For Compliance
358.7(e)(3)	The Transmission Provider must post information concerning potential merger partners as affiliates that may employ or retain Marketing Function employees.	Within 7 days after the merger is announced.	Information will remain on PG&E's Internet website for 90 days.	Corporate Secretary and/or Corporate Law will notify C&E of potential merger partners. C&E will post the information on PG&E's Internet website within the 7-day deadline.

ATTACHMENT A

PG&E'S Procedures for Compliance with Order No. 717 Posting Requirements

FERC Order No. 717 18 C.F.R. Section Number	Posting Requirement	When	How Long	Procedures For Compliance
358.7(f)(1)	Transmission Providers must post job titles and job descriptions of its Transmission Function employees.	By January 30, 2009 and within 7 business days of any change thereafter.	Information will remain on PG&E's Internet website until it is no longer required by FERC Order No. 717.	FERC compliance liaisons in Transmission Function departments will inform C&E of any changes to this list and C&E will post changes within the 7 day limit.

ATTACHMENT A

PG&E'S Procedures for Compliance with Order No. 717 Posting Requirements

FERC Order No. 717 18 C.F.R. Section Number	Posting Requirement	When	How Long	Procedures For Compliance
358.7(f)(2)	Notices of transfers between Transmission Function employees and Marketing Function employees or between Marketing Function employees and Transmission Function employees must be posted on PG&E's internet website. The information to be posted must include: the name of the transferring employee, the respective titles held while performing each function, and the effective date of the transfer.	Within 7 business days of a qualified transfer.	Information will remain on PG&E's Internet website for 90 days.	FERC liaisons in Transmission Function and Marketing Function departments will inform C&E of any employee transfers in and out of their organizations. C&E will post the information required on PG&E's Internet website within 7 business days.

ATTACHMENT A

PG&E'S Procedures for Compliance with Order No. 717 Posting Requirements

FERC Order No. 717 18 C.F.R. Section Number	Posting Requirement	When	How Long	Procedures For Compliance
358.7(g)(2)	Transmission Providers must notify the Commission and post on the OASIS or Internet website, of any emergency that resulted in any deviation from the Standards of Conduct ("Standards") lasting longer than one month.	Within 24-hours of a confirmed deviation lasting longer than one month.	Information will remain on PG&E's Internet website for 90 days.	The employee from the Transmission Function department identifying the potential deviation will report to the C&E department. The C&E and Law Departments will evaluate the report and determine if a deviation has occurred. If so, C&E will post the deviation on PG&E's Internet website within 24-hours of confirmation that a deviation lasting longer than one month has occurred and will notify the Commission, including seeking, as appropriate, a further exemption from the posting requirements under the Standards of Conduct.

ATTACHMENT A

PG&E'S Procedures for Compliance with Order No. 717 Posting Requirements

FERC Order No. 717 18 C.F.R. Section Number	Posting Requirement	When	How Long	Procedures For Compliance
358.7 (i)	The Transmission Provider must 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.	Within one business day of the act of a waiver.	Information will remain on PG&E's Internet website until it is no longer required by FERC Order No. 717.	This provision is largely inapplicable to PG&E. PG&E has transferred operational control of its transmission system to the California Independent System Operation Corporation (CAISO). As a Participating Transmission Owner of the CAISO, PG&E has access to certain transmission information but does not control access to or control the provision of transmission service on the interstate grid. The CAISO has the obligation to provide open access to the transmission system in a non-discriminating manner under the CAISO tariff.