

## Written Compliance Procedures – Standards of Conduct

Sabal Trail Transmission, LLC

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### Introduction

On October 16, 2008, the Federal Energy Regulatory Commission's ("Commission") issued Order No. 717 adopting new Standards of Conduct rules that apply uniformly to interstate natural gas pipelines and electric utilities ("Transmission Providers") and cover their relationship with their affiliates engaged in Marketing Functions that also conduct transmission transactions with them. To ensure that Transmission Function Employees of a Transmission Provider do not provide preferential treatment to its Marketing Function Employees or Marketing Function Employees of its affiliates, the Standards of Conduct require Transmission Function Employees to operate independently from Marketing Function Employees and prohibit Transmission Function Employees from providing Marketing Function Employees with access to non-public Transmission Function Information or Customer Information. Transmission Providers are required to implement, distribute and post procedures to ensure compliance with the Standards of Conduct.

These Written Compliance Procedures apply to Sabal Trail Transmission, LLC ("Sabal Trail"). All publicly available information required to be posted pursuant to these Written Compliance Procedures or the Commission regulations is posted under Informational Postings at [link.spectraenergy.com](http://link.spectraenergy.com) for Sabal Trail. All customer specific transactions for Sabal Trail are conducted via the LINK® System Customer Activities Website located at [link.spectraenergy.com](http://link.spectraenergy.com) which is limited to authorized users.

### Definitions

The following definitions will apply to these procedures:

**Customer Information:** Non-public information acquired from non-affiliated Transmission Customers or potential non-affiliated Transmission Customers, or developed in the course of responding to requests for transmission service.

**Marketing Function:** 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
- (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.

**Marketing Function Employee:** An employee, contractor, consultant or agent of Sabal Trail or of an affiliate of Sabal Trail who actively and personally engages on a day-to-day basis in Marketing Functions.

**Transmission Customer:** 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.

**Transmission Function:** 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:** An employee, contractor, consultant or agent of Sabal Trail who actively and personally engages on a day-to-day basis in Transmission Functions.

**Transmission Function Information:** Information related to Transmission Functions.

**Transmission Provider:** Any interstate natural gas pipeline that transports gas for others pursuant to subparts B or G of part 284 of the Commission Rules and Regulations. It does not include a natural gas storage provider authorized to charge market-based rates. For purposes of these compliance procedures, Sabal Trail is a Transmission Provider.

**Waiver:** The determination by Sabal Trail, if authorized by its tariff, to waive any provisions of its tariff for a given entity.

For purposes of these procedures, the term "employee" includes contractors.

A complete list of affiliates engaged in Marketing Functions can be found on Sabal Trail's Internet website at [link.spectraenergy.com](http://link.spectraenergy.com).

## Procedures

### 1. Training Enforcement.

#### 1.1 Written Procedures

1.1.1 Scope. These Compliance Procedures are designed to ensure compliance with the Standards of Conduct set forth in the Federal Energy Regulatory Commission's ("Commission") Order No. 717. The FERC Chief Compliance Officer or his/her designee (designated in Section 1.3 below) ensures that these Compliance Procedures are updated as needed, and posted on Sabal Trail's Internet website. These Compliance Procedures do not and cannot anticipate every situation affected by the Standards of Conduct; when questions arise, employees should seek guidance from their supervisor, the FERC Chief Compliance Officer, the FERC Compliance group, the Legal Department or Ethics & Compliance. Contact information for employees' referenced is listed on Sabal Trail's intranet site "The Source" by clicking "Compliance" in the "Our Company" header.

1.1.2 Distribution. The FERC Chief Compliance Officer will distribute these Compliance Procedures to all Transmission Function Employees, Marketing Function Employees, officers, directors, supervisory employees and any other employees likely to become privy to non-public Transmission Function Information. The FERC Chief Compliance Officer will send an annual reminder notice instructing the identified employees to read the procedures. FERC Compliance will ensure that new employees and transferred employees receive a link to the Compliance Procedures promptly upon employment.

1.2 Training. As described more specifically below, employees identified in 1.1.2 above will be trained on the Standards of Conduct. Such employees will also be required to receive such training annually. FERC Compliance will ensure that new Transmission Function Employees or employees likely to become privy to non-public Transmission Function Information are trained within 30 days of their employment start date.

1.2.1 Implementation. The FERC Chief Compliance Officer or designee will coordinate and develop training procedures for employees identified in 1.1.2 above. Training will normally be implemented through computer- or web-based training packages, but may on occasion be given via live classroom sessions or video replays. Upon completion of the training, employees will be required to acknowledge that they have received training regarding the Standards of Conduct and agree to abide by all rules, regulations, and internal policies and procedures. The FERC Chief Compliance Officer, or designee, will maintain training and acknowledgment records electronically in the Human Resources database, personnel or compliance files.

1.2.2 Code of Business Ethics Training for All Sabal Trail Employees. Sabal has an ethics and compliance program directed by the Vice President and Chief

Compliance Officer. As a part of this program, Sabal Trail has adopted a Code of Business Ethics (“CoBE”) which highlights the various compliance areas applicable to Sabal Trail’s business activities. Sabal Trail considers the ethics and compliance program and the CoBE to be complementary to these Compliance Procedures. The activities of the ethics and compliance program may change over time. The FERC Chief Compliance Officer, or designee, will coordinate with ethics and compliance in developing and implementing Sabal Trail’s training activities pursuant to these Compliance Procedures.

### 1.3 Responsibility for Compliance.

1.3.1 Responsibilities of Employees. All Sabal Trail employees are responsible for compliance with the Standards of Conduct and these Compliance Procedures.

1.3.2 FERC Chief Compliance Officer. Sabal Trail’s FERC Chief Compliance Officer and associated contact information is located on Sabal Trail’s Electronic Bulletin Board (LINK®) under Standards of Conduct in Informational Postings. The FERC Chief Compliance Officer is responsible for overseeing implementation of these procedures and enforcing them. The FERC Chief Compliance Officer may delegate such roles to others as appropriate. For employees’ reference, a list of persons to whom the FERC Chief Compliance Officer has delegated responsibility for postings required by the Standards of Conduct can be found on The Source by clicking on the link marked "FERC Compliance" under the “Our Company” heading and then by clicking “FERC Chief Compliance Officer”. Contact information is also located in Sabal Trail’s Standards of Compliance section at [link.spectraenergy.com](http://link.spectraenergy.com). The FERC Chief Compliance Officer must maintain a log of compliance issues and their resolution. The name and contact information for the FERC Chief Compliance Officer will be posted on Sabal Trail’s Internet website.

1.3.3 Obligation to Report. Any employee who knows of or suspects noncompliance with or a violation of these Compliance Procedures or the Standards of Conduct is required to report such violation immediately. Such matters can be reported to the employee’s supervisor, the Legal Department, the FERC Chief Compliance Officer, the FERC Compliance Department or Ethics & Compliance. See contact information on the Source by clicking on the link marked "FERC Compliance" under the “Our Company” heading and then by clicking “FERC Chief Compliance Officer”. Additionally, anonymous reports may be made through the Standards of Conduct Hotline (1-800-420-6004).

1.3.4 Prohibition against Retaliation. Retaliation against an employee for raising concerns with management or regulatory agencies is considered harassment. Sabal Trail will not tolerate harassment of any kind in the workplace. Sabal Trail forbids retaliation against any employee who has brought concerns to management or to regulatory agencies such as the Federal Energy Regulatory Commission, Equal Employment Opportunity Commission, or Occupational Safety & Health Administration or has participated in the

investigation or resolution of a harassment situation.

1.3.5 Consequences for Violating Compliance Procedures. Violations of the Standards of Conduct can have serious consequences for Sabal Trail. Therefore, employees who violate the Compliance Procedures or the Standards of Conduct may be subject to disciplinary action, up to and including discharge.

## 2. Independent Functioning of Sabal Trail Transmission Function Employees and Marketing Function Employees.

2.1 General Rule. Sabal Trail's Transmission Function Employees must function independently of its Marketing Function Employees and the Marketing Function Employees of its affiliates as outlined below.

2.1.1 Prohibited Activities. No Marketing Function Employee may conduct transmission system operations or reliability functions for Sabal Trail or have access to the gas control center. Except for incidental purchases or sales of natural gas to operate interstate natural gas pipeline transmission facilities, Sabal Trail Employees may not market, sell or broker natural gas in U.S. markets. Sabal Trail management will be responsible for ensuring enforcement of these requirements.

2.1.2 Employees Not Necessarily Considered Transmission Function or Marketing Function Employees. (The following is not meant to be a hard and fast rule. Rather, it is meant to be more of a general guideline. If any employee falling under one of the categories shown below has duties identified as Transmission or Marketing Functions, then that employee will be classified as a Transmission Function Employee or a Marketing Function Employee as appropriate.)

2.1.2.1 Support Employees; Field, Maintenance and Clerical Employees. Subject to the conditions stated below, support employees as well as field, maintenance and clerical employees are not considered Transmission Function or Marketing Function Employees. Such employees, however, must not act as a conduit, directly or indirectly, for non-public Transmission Function Information or non-public Customer Information to a Marketing Function Employee.

a. Support Employees. Whether an employee is a "support employee" whose duties would not be considered Transmission Functions or Marketing Functions depends on that employee's day-to-day responsibilities, and must be determined by the FERC Chief Compliance Officer or designee. Currently, examples of employees in a support function that would not necessarily be considered Transmission Function or Marketing Function Employees include employees in human resources, information technology, finance, and certain employees in accounting and risk management. Lawyers who participate in business decisions by rendering legal or regulatory advice in their traditional

roles are generally support employees and would not, therefore, be considered Transmission Function or Marketing Function Employees.

b. Field Employees. Field employees will not be considered Transmission Function Employees unless such employees are actively and personally involved in day-to-day planning for facility shut downs or shutting down facilities based on economic reasons. Otherwise, field employees will most likely not be considered Transmission Function or Marketing Function Employees.

2.1.2.2 Risk Management. An employee of Sabal Trail or its affiliates may perform certain risk management functions without being classified as a Transmission Function or Marketing Function Employee, so long as such employee does not actively and personally engage in day-to-day Transmission Function or Marketing Function activities. Risk management employees will not direct Transmission Function Employees' or Marketing Function Employees' responses to the risks they identify, including credit risk. Risk management employees must not serve as conduits for sharing non-public Transmission Function Information or Customer Information with a Marketing Function Employee. For example, a risk management employee cannot disclose to a Marketing Function Employee that a pipeline customer has not paid its transmission bills. Risk management functions that would not be considered Transmission Functions or Marketing Functions include, but are not limited to: (1) the management of corporate-wide business risk exposure; (2) evaluation of business risk exposure for third parties and on an aggregate basis; (3) management of overall corporate investment; (4) establishment of spending, trading, and capital authorities for business units; and (5) approval of expansion projects.

2.1.2.3 Officers, Directors and other Supervisory Personnel. Officers, directors and other supervisory personnel of Enbridge Inc., Sabal Trail and affiliates of Enbridge Inc. and Sabal Trail may have governance responsibilities pertaining to all such entities, but they must not actively and personally engage in day-to-day Transmission Functions which include planning, directing, organizing or carrying out day-to-day transmission operations. For example, supervisory personnel who are not involved in the negotiation of the sale of capacity on Sabal Trail, but who simply approve the contract governing the sale, are not Transmission Function Employees. Furthermore, upper level management personnel who review contracts over a certain dollar amount pursuant to delegation of authority requirements are not converted into deal-makers themselves and are, therefore, not Transmission Function Employees.

2.1.2.4 Periodic Review. The FERC Chief Compliance Officer, or designee, shall bi-annually review the job responsibilities of all employees described above to ensure that the classification of such employees is consistent with the Standards of Conduct.

2.1.3 Permitted Exception to Independent Functioning. Sabal Trail employees may exchange with Marketing Function Employees certain non-public Transmission Function Information which is necessary to maintain or restore operations of the transmission system. In such circumstances, a contemporaneous recording of the exchange of such information must be made and provided to the FERC Chief Compliance Officer; the FERC Chief Compliance Officer must retain the recorded information for a period of five years from the date the exchange occurred. If the exchange is a result of an emergency, the contents of the exchange must be recorded and submitted to the FERC Chief Compliance Officer as soon as practical after the fact. 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.

2.1.4 Committees. Sabal Trail and affiliates of Sabal Trail may participate on parent company committees, or committees comprised of employees from various business units, provided the following guidelines are followed:

- In accordance with the no-conduit rule, if the membership of a parent company or multi-business unit committee includes Transmission Function and/or Marketing Function Employees, no non-public Transmission Function Information or Customer Information will be disclosed to that committee.
- Committee members will not act as a conduit, directly or indirectly, for providing non-public Transmission Function Information or Customer Information to Marketing Function Employees.
- A parent company or multi-business unit committee will not engage in Transmission Function activities for Sabal Trail or Marketing Function activities for affiliates of Sabal Trail.

### 3. Affiliates Engaged in Marketing Functions.

3.1 Names and Addresses. The names and addresses of all affiliates of Sabal Trail that employ or retain Marketing Function Employees will be posted on Sabal Trail's Internet website at [link.spectraenergy.com](http://link.spectraenergy.com). The FERC Chief Compliance Officer will implement a procedure for updating the list of such affiliates and updating the Internet website posting within seven (7) business days of the effective date of any changes. Additionally, the FERC Chief Compliance Officer will send a periodic notification to all Sabal Trail Transmission Function Employees informing them of updates.

3.2 Mergers; Acquisitions. Mergers and Acquisitions departments will notify the FERC Chief Compliance Officer of any proposed merger between Sabal Trail ownership entities and third parties. The FERC Chief Compliance Officer will:

- a. Ensure that notice of the merger is posted on the Saba Trail's Internet website as required by the Standards of Conduct within seven (7) business days of public announcement of any such merger; and
- b. For purposes of compliance with these Compliance Procedures and the Standards of Conduct, Sabal Trail will treat all merger partners as if they were already affiliated with Sabal Trail upon announcement of the merger, with the result that any entity that would be an affiliate engaged in Marketing Function activities after the merger shall be treated as if it is an affiliate engaged in Marketing Function activities upon announcement of the merger. Should such affiliates conduct transmission transactions on Sabal Trail at the time of the announcement of the merger, then Transmission Function Employees of Sabal Trail must function independently of the Marketing Function Employees of such potential affiliates.

3.3 Shared Facilities. Sabal Trail may share facilities with affiliates engaged in Marketing Functions provided that written procedures are implemented to ensure that work areas are not shared between Marketing Function Employees and Transmission Function Employees and that non-public Transmission Function Information and Customer Information is not improperly shared. Sabal Trail will post on its Internet website a list of such shared facilities which will include the types of facilities shared and the addresses of such facilities.

#### 4. Employee Information.

4.1 Job Titles and Descriptions. Sabal Trail must post on its Internet website job titles and descriptions of its Transmission Function Employees. The FERC Chief Compliance Officer has established written procedures to ensure that job titles and descriptions of its Transmission Function Employees are updated within seven (7) business days of the effective date of any changes. The FERC Compliance Group will work in cooperation with the FERC Chief Compliance Officer to enforce such procedures. Additionally, the FERC Compliance Group will contact all supervisors on a regular basis to identify any changes in Transmission Function Employee job titles or job descriptions.

4.2 Transfers of Employees. Transfers of Transmission Function Employees between Sabal Trail and affiliates engaged in Marketing Functions and transfers of Marketing Function Employees from affiliates engaged in Marketing Functions to Sabal Trail are permitted subject to the conditions below.

##### 4.2.1 Conditions on Transfers.



4.2.1.1 Notification. Transferring employees between Sabal Trail and affiliates of Sabal Trail engaged in Marketing Functions and conducting transmission transactions on Sabal Trail are treated as terminations/new hires rather than transferring employees. The FERC Chief Compliance Officer will provide the Human Resources Department of Sabal Trail a current list of such affiliates (“Affiliate List”). When a new hire will be a Transmission Function Employee, Human Resources will inquire if the new hire’s previous position was as a Marketing Function Employee for an affiliate on the Affiliate List. For a Transmission Function Employee terminating from Sabal Trail, HR will inquire if the terminated employee is taking a position as a Marketing Function Employee for an affiliate on the Affiliate List. Should HR receive an affirmative response to either inquiry, HR will notify FERC Compliance to post such employee as a transferring Transmission Function Employee on the Sabal Trail Internet website.

Likewise, the Human Resources Department of an affiliate on the Affiliate List will inquire of any new hire accepting a position as a Marketing Function Employee if such new hire’s previous position was a Transmission Function Employee position with Sabal Trail. For a Marketing Function Employee terminating from an affiliate on the Affiliate List, HR of such affiliate will inquire if the terminating employee has accepted a position as a Transmission Function Employee with Sabal Trail. Should HR receive an affirmative response to either inquiry, they will immediately notify Sabal Trail’s HR department and Sabal Trail’s HR will notify FERC Compliance to post such employee as a transferring Transmission Function Employee on the Sabal Trail Internet website.

4.2.1.2 Posting. The Human Resources Department and FERC Compliance have designated an employee to be responsible for these Compliance Procedures as they pertain to transfers of Transmission Function Employees. Such designated employee is responsible for making the required posting within seven (“7”) business days of the effective date of the transfer. The posting must contain the following information:

- a. The name of the transferring employee;
- b. The respective titles while performing the functions of a Transmission Function Employee and Marketing Function Employee; and
- c. The effective date of the transfer.

4.2.1.3 Information Services. Information Services has implemented written procedures for terminating the transferring Transmission Function Employee’s access to Sabal Trail’s databases and applications as of the effective date of the transfer. Transfers of Transmission

Function Employees from Sabal Trail to a Marketing Function Employee role in an affiliate engaged in Marketing Functions are treated as terminated employees in order to ensure the termination of all authorizations. Likewise, transferring Marketing Function Employees transferring to a Transmission Function Employee role in Sabal Trail from an affiliate engaged in Marketing Functions are treated as new hires and granted access only to databases and applications required in order to carry out their job duties.

4.2.1.4 Support Services. Support Services has implemented written procedures for terminating the transferring Transmission Function Employee's access to Sabal Trail's work areas. Such transferring Transmission Function Employees will no longer have access to Sabal Trail's work areas and will be treated as visitors should there be any need for future access.

4.2.1.5 Information. The transferring Transmission Function Employee may not bring any documents (paper or electronic) containing non-public Transmission Function Information, Customer Information, or strategic or market information of any kind to the new position. All such information must be left in the custody of the transferring employee's supervisor at Sabal Trail. If necessary, the FERC Chief Compliance Officer may recommend that the transferring Transmission Function Employee's duties at his or her new position be restricted in order to avoid the potential for violating the Standards of Conduct.

4.2.1.6 Training. FERC Compliance will ensure that any transferring employee from a Marketing Affiliate completes the Standards of Conduct training course within thirty (30) days of the effective date of the transfer.

4.2.1.7 No-Conduit Rule. Under no circumstances may the transferring employee be a conduit of non-public Transmission Function Information or Customer Information from Sabal Trail to a Marketing Function Employee. See No-Conduit Rule at Section 8 below.

4.2.2 Multiple Transfers. Transmission Function Employee transfers from Sabal Trail to an affiliate engaged in Marketing Functions and a subsequent transfer back to Sabal Trail, or Marketing Function Employee transfers from an affiliate engaged in Marketing Functions to Sabal Trail and a subsequent transfer back to an affiliate engaged in Marketing Functions, require prior approval by the FERC Chief Compliance Officer if the subsequent transfer occurs within one (1) year of the previous transfer and the employee is a Transmission Function Employee or a Marketing Function Employee at either or both companies. The FERC Chief Compliance Officer will not approve any transfers that could result in the improper sharing of such employee between an affiliate engaged in Marketing Functions and Sabal Trail.

5. Restrictions on Work Area Access. All Sabal Trail employees, agents and consultants must comply with written procedures developed and implemented by employees of Security Services in charge of building security (in consultation with the FERC Chief Compliance Officer), regarding restrictions on access to work areas.

5.1 Marketing Function Employees. Marketing Function Employees are not permitted to enter the Sabal Trail Gas Control work area or other Sabal Trail work areas used for Transmission Functions or reliability functions. The FERC Chief Compliance Officer has identified such areas, and ensured that Marketing Function Employees' badges are coded so that access to these work areas by such employees is prohibited. Sabal Trail employees in these work areas are instructed not to provide Marketing Function Employees with access to these areas.

5.1.1 Badges. Marketing Function Employee badges and Sabal Trail badges are maintained in separate access control systems. The Marketing Function Employee badges are not capable of accessing Sabal's Transmission Function work areas. Sabal Trail's Transmission Function Employee badges are not capable of accessing Marketing Function work areas. Transmission Function Employees who must enter a Marketing Function work area of an affiliate engaged in Marketing Functions must record their visit in a log and must be accompanied by an employee of such affiliate. Marketing Function Employees visiting Sabal Trail's facilities must check-in with security in order to obtain a limited access visitors badge and must be accompanied by a Sabal Trail employee at all times. The FERC Chief Compliance Officer, in connection with Security Services, will establish such other work area access restrictions as appropriate to ensure compliance with the Standards of Conduct.

5.1.2 Reminder Notice. The FERC Chief Compliance Officer will send an annual reminder notice via e-mail, or within annual training, to all affected employees outlining the work area access restrictions.

6. Separate books and records. Sabal Trail's Controllers Department has implemented written procedures to ensure that Sabal Trail's books and records are kept separately from the books and records of all affiliates engaged in Marketing Functions.

7. Information Access and Prohibited Disclosure.

7.1 Information Sharing Strictly Prohibited.

7.1.1 Non-Public Transmission Function Information and Customer Information. Access by any Marketing Function Employee to Sabal Trail's non-public Transmission Function Information or Customer Information, or disclosure of such non-public information by any Sabal Trail employee to a

Marketing Function Employee is strictly prohibited. Some exceptions apply, as described below. The FERC Chief Compliance Officer has communicated guidelines to any Sabal Trail employees who regularly communicate with customers about their specific transmission transactions or with Marketing Function Employees who conduct transmission transactions on Sabal Trail about day-to-day Transmission Functions specific to the services provided, including guidelines on the specific types of communications that are permissible under the Standards of Conduct.

7.1.1.1 Exception (Customer Information). Non-public Customer Information may be disclosed to a Marketing Function Employee if the customer or potential customer consents in writing to such disclosure. This exception includes the disclosure of non-public Customer Information to a Marketing Function Employee pursuant to an agency agreement in which the customer designates the affiliate of the Marketing Function Employee as its agent for transactions performed in the LINK® System. The Marketing Function Employee who obtains such written consent from the customer must communicate the consent to the designated employee at Sabal Trail responsible for posting. The FERC Chief Compliance Officer has designated an employee who is responsible for posting; such employee posts on Sabal Trail's Internet website a notice of the customer's consent along with a statement that no preferences, either operational or rate-related, were provided to the customer in exchange for its consent to disclose such information.

7.1.1.2 Exception (Operating Information). Sabal Trail Transmission Function Employees may share non-public Transmission Function Information with Marketing Function Employees necessary to maintain the transmission system's operations. Operating information may include: confirmations, nominations and schedules with upstream producers and gathering facilities, operational data relating to interconnection points, and information relating to maintenance of interconnected facilities. Any such exchanges between Transmission Function Employees and Marketing Function Employees (unless such exchanges are pursuant to the exception in 7.1.1.3 below) must be recorded contemporaneously at the time of the exchange unless the exchange is a result of an emergency. In the event of an emergency, the recording of the exchange of information should be done as soon as possible after the fact. 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 from the date of the exchange. Any questions regarding whether a communication is permissible must be discussed with the FERC Chief Compliance Officer prior to such communication.

7.1.1.3 Exception (Transaction Specific Information). A Transmission Function Employee of Sabal Trail may communicate Marketing

Function Information that pertains solely to a Marketing Function Employee's specific request for transmission service. This is intended to be a narrow exception. Information is not transaction- specific if it pertains to the pipeline system generally. Exchanges of information under this category do not need to be recorded.

7.1.2 Disclosure Must Be Reported and Posted. Any disclosure of non-public Transmission Function Information or Customer Information, or access to such information, in violation of 7.1.1, even if inadvertent, must immediately be reported to the FERC Chief Compliance Officer. The FERC Chief Compliance Officer is responsible for ensuring that the appropriate information regarding the disclosure is immediately posted on Sabal Trail's Internet website in accordance with the Standards of Conduct. If non-public Transmission Function Information was disclosed, the information that was disclosed must be posted. If non-public Customer Information was disclosed, the posting must indicate that non-public Customer Information was disclosed, but the content of the information does not need to be posted.

7.1.3 Affiliate Information. It is Sabal Trail's policy that access by any Transmission Function Employee to customer, market or other strategic information of an affiliate engaged in Marketing Functions, or disclosure of such information by a Marketing Function Employee (or any Sabal Trail employee) to a Transmission Function Employee of Sabal Trail is strictly prohibited. Transmission Function Employees may, however, receive from a Marketing Function Employee any transaction specific information necessary for providing service under transmission service agreements between the affiliate engaged in Marketing Functions and Sabal Trail.

## 7.2 Information Security(General).

### 7.2.1 Information Services Personnel.

7.2.1.1 Only Sabal Trail and certain Enbridge Inc. support employees will provide security, system, server and application administration for Sabal Trail. Such employees will be trained on the Standards of Conduct and will not act as improper conduits of non- public Transmission Function Information between Sabal Trail and its affiliates engaged in Marketing Functions.

7.2.1.2 Certain Enbridge Inc. and Sabal Trail support employees may have responsibilities related to hardware support and workstation support for Sabal Trail. Such support employees will be trained on the Standards of Conduct and will not act as improper conduits of information between Sabal Trail and its affiliates engaged in Marketing Functions.

7.2.2 Authorization. The Information Services department has designated an employee or employees to be responsible for these Compliance Procedures

pertaining to authorization for access to Sabal Trail applications, servers or data as described in this Section 7. Such employee(s) have implemented written procedures to ensure that:

- No improper access is granted to Sabal Trail applications, servers or data;
- An employee's access to applications, servers or data is terminated promptly upon a Sabal Trail employee's termination or transfer to a Marketing Function Employee role. (HR is responsible for promptly notifying the security administration group of any such termination or transfer.);
- Employees transferring into Sabal Trail from a Marketing Function Employee role or out of Sabal Trail into a Marketing Function Employee role of an affiliate engaged in Marketing Functions and conducting transmission transactions on Sabal Trail are given a new Local Area Network ("LAN") ID and the old LAN ID is revoked.
- Any request for LAN IDs to the networks of both Sabal Trail and an affiliate engaged in Marketing Functions and conducting transmission transactions on Sabal Trail is sent to the Sabal Trail FERC Chief Compliance Officer, such affiliate's FERC Chief Compliance Officer, and the Chief Information Officer. LAN ID's to both networks will not be granted without approval in writing from all three of these officers.

7.2.3 Passwords. The employee or employees designated by the manager of the security administration group ensure that IDs and passwords comply with the information security requirements stated in the Sabal Trail information security policy posted on the Source.

### 7.3 Information Security (Transmission Function Applications).

7.3.1 Definition. A "Transmission Function Application" is any application that allows access to Sabal Trail non-public Transmission Function Information or Customer Information (examples: SCADA, DSS, LINK®).

7.3.2 Marketing Function Employee Access Prohibited. No Marketing Function Employee is allowed access to any Transmission Function Application, except that a Marketing Function Employee may have access to the LINK® System as described in Section 7.4 below.

7.3.3 Functions Restricted. User accounts are restricted to only those functions of the application to which the particular user is entitled.

7.4 Information Security (External Users, including Marketing Function Employees). Sabal Trail applications are the only Transmission Function Applications through which external users have access to Transmission Function Information or Customer Information. An external user has access to only the external user's own information, information of a customer for whom the external user is acting as agent or asset manager and who has consented to such disclosure as described in Section 7.1.1.1 above, and information that is publicly available to all other users. The Information Systems department or its designee has implemented written procedures to prevent improper access to non-public Transmission Function Information or Customer Information contained in the Transmission Function Applications.

7.5 Information Security (Accounting Applications). The SES Basis Security group has implemented procedures to ensure that SAP system security access is set up to prevent access by Transmission Function Employees to the accounts of affiliates engaged in Marketing Functions and to prevent access by Marketing Function Employees to Sabal Trail accounts.

8. No-Conduit Rule. No Sabal Trail or Sabal Trail affiliate employee may, either intentionally or inadvertently, act as a conduit or use anyone as a conduit for disclosing non-public Transmission Function Information or Customer Information from Sabal Trail to any Marketing Function Employee of Sabal Trail or Marketing Function Employee of an affiliate of Sabal Trail.

9. Implementing Tariffs.

9.1 Strict Enforcement of Tariff Provisions. Sabal Trail 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. Tariff provisions that allow for the use of discretion must be applied fairly and impartially so that all shippers are treated in a non-discriminatory manner. Sabal Trail's Regulatory Affairs Department will identify those tariff provisions that allow for the use of discretion.

9.2 Waiver Log. Sabal Trail is required to maintain a written log of waivers that it grants in favor of an affiliate with respect to tariff provisions. The log must be available for Commission audit upon request. Granting of a specific waiver in favor of an affiliate and any blanket waiver that is applicable to all customers of Sabal Trail including affiliates of Sabal Trail must be reported via email to [regaffairs@spectraenergy.com](mailto:regaffairs@spectraenergy.com). The FERC Chief Compliance Officer has designated an employee(s), who maintains the log. The FERC Chief Compliance Officer provides guidance to Sabal Trail Transmission Function Employees regarding the types of activities that must be logged.

9.3 Posting Waivers. Sabal Trail is required to post on its Internet website a notice of each waiver of a tariff provision in favor of an affiliate within one ("1") business day of the act of waiver unless such waiver was previously approved by the Commission. The waiver posting must remain on Sabal Trail's Internet

website for a period of ninety (“90”) days from the date of each act of waiver and must be retained for a period of five (“5”) years from the date of such act of waiver.

9.4 Processing Requests for Transmission. Sabal Trail must process all similar requests for transmission services in the same manner and within the same period of time.

9.5 No Preference to Any Person. Sabal Trail may not, through its tariff or otherwise, give 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).

## 10. Administrative Responsibilities of FERC Chief Compliance Officer.

10.1 Record Retention. The FERC Chief Compliance Officer is the primary record keeper of information related to the Sabal Trail’s compliance with these Compliance Procedures and the Standards of Conduct. The FERC Chief Compliance Officer retains such records and information for a minimum period of five (“5”) years. Examples of the types of records and information include but are not limited to:

- a. Training materials and updates and revisions thereto;
- b. List of employees trained and dates of training;
- c. Details of deviations from the Standards of Conduct;
- d. Lists of shared facilities;
- e. Lists of affiliates engaged in Marketing Functions along with updates and revisions thereto;
- f. Job titles and descriptions with revisions and updates thereto;
- g. Lists of merger partners and their affiliates engaged in Marketing Functions;
- h. Lists of Transmission Function Employee and Marketing Function Employee transfers;
- i. Data on information security along with revisions and updates thereto;
- j. List of waivers in favor of affiliates with revisions and updates thereto;
- k. Tariff waiver log; and
- l. FERC compliance log

10.2 Primary Contact. The FERC Chief Compliance Officer is the primary contact for all individuals or organizations with questions or concerns regarding Sabal Trail’s compliance with the Standards of Conduct.