

GUARDIAN PIPELINE L.L.C.

IMPLEMENTATION PROCEDURES

STANDARDS OF CONDUCT

PURSUANT TO 18 C.F.R. PART 358 AND §284.286

REVISED: SEPTEMBER 28, 2005

PURSUANT TO 18 C.F.R. PART 358 AND 18 C.F.R. §284.286

Pursuant to 18 C.F.R. §§ 358.4(e)(2) and (3) 18 C.F.R. § 284.286 of the Federal Energy Regulatory Commission's (Commission) Regulations, Guardian Pipeline L.L.C. (Guardian), an interstate natural gas pipeline company, posts below its written procedures implementing the Standards of Conduct (SOC) pursuant to 18 C.F.R. Part 358.

STANDARDS OF CONDUCT

To ensure compliance with the requirements of the SOC set forth in 18 C.F.R. Part 358, as applicable to interstate natural gas pipelines which transport gas for others pursuant to subpart A of Part 157 or subparts B or G of Part 284 of Chapter 18 of the Code of Federal Regulations, Guardian adopts and will utilize the following procedures implementing each of the individual provisions of 18 C.F.R. §358.4 and §358.5 in the manner set forth below, section-by-section.

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§358.4 INDEPENDENT FUNCTIONING

(a) Separation of functions.

- (1) Pursuant to 18 C.F.R. §358.4(a)(1), except in emergency circumstances affecting system reliability, the Transmission Function Employees (TFE or TFEs), as defined in 18 C.F.R. Part 358.3(j), of Guardian will function independently of the Energy Affiliates' employees.

Guardian has one employee and pursuant to an Operating Agreement, utilizes the employees of Northern Plains Natural Gas Company, LLC (NPNG or Operator), a service company, to operate Guardian's pipeline. NPNG personnel provide the gas volume scheduling services and gas control function for Guardian. NPNG does not provide the marketing of transportation services for Guardian. As Operator, the employees of NPNG also have the responsibility to operate, in addition to Guardian, Midwestern Gas Transmission Company (MGT), Viking Gas Transmission Company (VGT) and Northern Border Pipeline Company (NBPL). These particular transmission functions and operating responsibilities are not shared with employees of any other company. There are some NPNG employees that are shared with an Energy Affiliate but all of these employees provide support services and not energy affiliated functions.

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The Chief Compliance Officer (CCO) has determined that Guardian shares none of its TFEs with its Marketing or Energy Affiliates (for ease of reference, the remainder of these procedures will refer to Energy Affiliate only because the category of Energy Affiliate includes all affiliates that are Marketing Affiliates). Guardian is owned and managed by three companies: VGT, Wisconsin Energy Corporation (WEC), and WPS Investment, LLC, a wholly owned subsidiary of WPS, Resources Corporation (WPS). Each owner has a one-third voting interest. A Management Committee made up of one representative from each of the owners manages Guardian. Guardian's Ownership Chart, indicating all parent companies and the relative position of Energy Affiliates, is posted on its Informational Postings website located at <http://www.guardianpipeline.com>.

NPNG is a subsidiary of ONEOK, Inc. (ONEOK). ONEOK provides shared support services to Guardian and an Energy Affiliate owned by Northern Border Partners, L.P. (NBP), Bear Paw Energy, LLC. In addition, ONEOK provides shared support services to Guardian, other Transmission Providers and Energy Affiliates that have ownership associations with ONEOK. Guardian's Organizational Chart(s) and Job Descriptions, posted on its Informational Postings website, show and describe the location and functions of service companies and shared employees.

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In addition, several other means of independent functioning protection have been implemented. First, in order for an employee of an Energy Affiliate to gain access to any of Guardian's offices located in Milwaukee, Wisconsin or the Operator's office in Omaha, Nebraska, the Energy Affiliate employee must first check in at the reception area. The receptionist will call the appropriate NPNG or Guardian employee, who is meeting with the Energy Affiliate employee, to accompany the Energy Affiliate employee to their designated meeting location and the NPNG or Guardian employee is responsible for ensuring that the Energy Affiliate employee does not have access to any transmission information at any office location. Secondly, all employees are notified of their job status as either a TFE, shared or support employee and are on notice, via the Operator provided training, of their special duties not to be a conduit of any transmission information to an Energy Affiliate.

In emergency situations, the Commission's regulations allow transmission providers to receive emergency assistance from the employees of Energy Affiliates. Accordingly, Guardian may utilize the services of an employee of an Energy Affiliate in the case of emergency circumstances affecting transmission system reliability. However, in such an event, and in accordance with the provisions of 18 C.F.R. Part 358.4(a)(2), a full report will be given to the CCO describing the nature of the services performed by the employee of the Energy Affiliate.

- (2) Pursuant to 18 C.F.R. §358.4(a)(2), Guardian may take whatever steps are necessary to keep the system in operation in emergency circumstances. Further, Guardian will report to the Commission, and post on its Internet website, each emergency that results in any deviation from the SOC (*i.e.*, if TFEs and employees of Energy Affiliates do not function independently), within 24-hours of such deviation.

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The report must describe the use of any Energy Affiliate personnel, whether any transmission information was shared with any Energy Affiliate and any other interaction with any Energy Affiliate of Guardian, the time the emergency terminated and the time the employee of the Energy Affiliate ceased providing services for Guardian. At the time of cessation of services, the Guardian or Operator employee responsible for obtaining the services of the employee of the Energy Affiliate shall be responsible for providing a copy of the SOC to the employee of the Energy Affiliate and the employee of the Energy Affiliate shall sign a certification that he or she will not act as a conduit of information to the Energy Affiliate. Such reporting and posting by Guardian would also occur if TFE employees were utilized in emergency circumstances of the Energy Affiliate. Within 24-hours of a deviation from the SOC during the emergency situation, the CCO shall report to the Commission and post on its Internet website, located at <http://www.guardianpipeline.com>. Such posting will be made under Informational Postings; Category-Non-discriminatory Rqts; Subcategory-Emergency Deviations and shall remain posted for a period of at least 90-days.

- (3) Pursuant to 18 C.F.R. §358.4(a)(3), Operator prohibits the employees of Energy Affiliates from: (i) conducting transmission system operations or reliability functions and (ii) having access to the system control center or similar facilities used for transmission operations or reliability functions.

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Operator achieves this by controlling access with a key-card security system, managed by the Vice President of Administration, limiting the access of an Energy Affiliate employee to the public areas of Operator's office building., unless accompanied by an Operator employee. Employees of Energy Affiliates must be escorted by an Operator employee to all non-public locations in Operator's office building. In addition, the SOC training makes it clear that employees of Energy Affiliates shall not have access to the system control center of Operator. Since Operator does not share field employees with any Energy Affiliate, there are no special procedures that need to be implemented in the field.

- (4) Pursuant to 18 C.F.R. §358.4(a)(4), Operator shares a limited number of support employees with certain of its Energy Affiliates. In particular, at NPNG, there are support personnel shared in the various departments that are posted as shared employees in both the Operator's and Guardian's organization chart and job descriptions. Hiring supervisors are required to provide advance notice to the Director of HR and the Chief Compliance Officer in the event any shared position changes within NPNG. In the event a change has occurred, the Operator will prepare a revised posting and ensure that the posting is made within seven (7) business days of the change. Operator shall post its comprehensive Organization Charts on its Internet website located at <http://www.guardianpipeline.com> under Informational Postings; Category-Organization Charts.

The transmission information of Guardian is physically separated from the Energy Affiliates so the employees of the Energy Affiliates can not obtain access to any Guardian transmission information. In addition, shared and support employees are given SOC training and shared employees certify that they will not be conduits or use others as conduits to provide access to non-public transmission information to Energy Affiliates.

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The shared support employees within ONEOK are located in separate office buildings in Tulsa, Oklahoma and do not have access to Guardian's office building in Milwaukee, Wisconsin or Operator's building in Omaha, Nebraska beyond the public areas and under the control of the applicable employees of NPNG that are working with the shared support employees. The shared support employees of ONEOK do not have key-card access to non-public areas of the Operator's office building.

- (5) Pursuant to 18 C.F.R. §358.4(a)(5), Transmission Provider may share senior officers and directors who are not transmission function employees with their Energy Affiliates. As noted, Guardian has one officer and its operations are conducted by NPNG through its Operating Agreement. The management of Guardian is overseen by a Management Committee comprised of three members; Fred Rimington, representative for VGT and Chairman, Anne Klisurich, representative for Wisconsin Energy Corporation, and Joe O'Leary, representative for WPS Investments, LLC. These individuals are not TFEs and do not act as a conduit to share transmission information with Energy Affiliates.

- (6) Pursuant to 18 C.F.R. §358.4(a)(6), Transmission Providers may share risk management employees that are not engaged in transmission functions or sales or commodity functions with their Energy Affiliates. Operator shares the risk management function with Energy Affiliates. Procedures are in place that will assure that the employees of risk management do not engage in transmission functions and sales or commodity functions with the Energy Affiliates. The risk management employees have been given SOC training and have certified that they will not act as a conduit or use others as a conduit for providing Guardian's non-public transmission information to the Energy Affiliates.

(b) Identifying affiliates on the public Internet website.

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- (1) Pursuant to 18 C.F.R. §358.4(b) (1) Guardian posts the names and addresses of its Energy Affiliates on Guardian’s Internet website. Operator has in place procedures that require the Corporate Secretary of WPS Resources Corporation, the parent company of WPS Investments, LLC, to notify the Operator’s CCO and General Counsel & Secretary of NPNG (i) additions, (ii) sales, deletions or dissolutions, and (iii) name changes of all corporate entities which qualify as "Energy Affiliates.” A representative of TransCanada will notify Operator's CCO of (i) additions; (ii) sales, deletions, or dissolutions, and (iii) name changes of all corporate entities which qualify as "Energy Affiliates." The procedures further provide that the CCO shall notify the administrators of the database of any additional Energy Affiliate, any Energy Affiliate which is dissolved, sold or which otherwise goes out of existence and any Energy Affiliate with a name change. The CCO shall ensure that the change is posted on Guardian's Internet website located at <http://www.guardianpipeline.com> under Informational Postings; Category-Energy Affiliate Info; Subcategory-Names and Addresses within seven (7) business days of the date of the change.

Guardian does not make any commercial sales of gas. However, Guardian may make operational purchases and sales of gas to maintain its pipeline system's operational integrity. Since 18 C.F.R. §358.3(e)(3) exempts “incidental purchase or sales of natural gas to operate interstate natural gas pipeline transmission facilities” from the definition of “Marketing, sales or brokering,” these sales are appropriately administered by Operator. These Operator employees do not qualify as marketing employees and do not constitute a sales unit to which the regulations apply.

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(2) Pursuant to 18 C.F.R. §358.4(b)(2) Guardian posts its shared facilities on its Internet website located at <http://www.guardianpipeline.com> under Informational Postings; Category-Energy Affiliate Info; Subcategory-Shared Facilities. Operator has established procedures whereby 1) the Vice President of Administration notifies the CCO of any change that would result in either the addition or deletion of office facilities shared by Guardian and Energy Affiliates and 2) the Director of Information Technology (IT) or Manager of IT notifies the CCO of any change that would result in either the addition or deletion of IT hardware and applications shared by Operator and Energy Affiliates. Any required changes shall be posted within seven (7) business days of the effective date of the change.

(3) Pursuant to 18 C.F.R. §358.4(b)(3)(i)

(i) Guardian posts on its Internet website a chart showing the organizational structure of the parent companies and the relative position of all Energy Affiliates and all service companies to Guardian. Operator shall post such comprehensive Organization Charts on its Internet website located at <http://www.guardianpipeline.com> under Informational Postings; Category-Organization Charts.

The appropriate Corporate Secretary shall submit to the CCO the appropriate changes to the Organization Chart whenever there is the addition or deletion of an Energy Affiliate, a name change, or an address change and shall post the change on Guardian's Internet website within seven (7) business days of the effective date of the change.

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- (ii) Pursuant to 18 C.F.R. §358.4(b)(3)(ii), Guardian posts on its Internet website Organization Charts and accompanying listing of Job Descriptions of Guardian and Operator showing the business units, job titles and descriptions, and chain of command for all positions, including officers and directors (if applicable), with the exception of clerical, maintenance, and field positions. Guardian shall post such comprehensive organization charts on its Internet website located at <http://www.guardianpipeline.com> under Informational Postings; Category-Organization Charts. In addition, the job titles and descriptions shall include an indication whether the employee is involved in transmission functions, whether the employee is shared with an Energy Affiliate, and the name of the supervisory employees who manage non-clerical employees involved in transmission functions.

As a part of the procedures designed to ensure that the posting of Organization Chart of Guardian is kept current, Operator has instituted procedures which require hiring supervisors to provide the Director of HR advance notice of any change of officers, directors (if applicable), chain of command, business units, personnel, positions, and job titles or descriptions. The procedures specify that the Director of HR shall make the appropriate changes to the Organization Chart(s) and Job Descriptions postings of Guardian and post the new chart(s) no later than seven (7) business days after the effective date of the change.

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- (iii) Pursuant to 18 C.F.R. §358.4(b)(3)(iii), in the event that there are employees (a) who are engaged in transmission functions for Guardian and marketing or sales functions (if such are instituted) or (b) who are engaged in transmission functions for Guardian and are employed by any of the Energy Affiliates (if there are any such employees in the future), Operator will post (a) the name of the business unit within the marketing or sales unit (if such is instituted) or (b) the Energy Affiliate, the organizational structure in which the employee is located, the employee's name, job title, and job description in the marketing or sales unit (if such is instituted) or Energy Affiliate, and the employee's position within the chain or command of the marketing or sales unit or Energy Affiliate.
- (iv) Pursuant to 18 C.F.R. §358.4(b)(3)(iv), Guardian will update the information on its Internet website required by §§358.4(b)(1), (2) and (3), no later than seven (7) business days after any change, and post the date on which the information was updated. Operator shall post such information on its Internet website located at <http://www.guardianpipeline.com> under Informational Postings; Category-Organization Charts.
- (v) Pursuant to 18 C.F.R. §358.4(b)(3)(v), Guardian will post the names and addresses of potential merger partners and related Energy Affiliates no later than seven (7) business days after the potential merger is announced. Such information shall be posted on its Internet website located at <http://www.guardianpipeline.com> under Informational Postings; Category-Energy Affiliate Info; Subcategory-Potential Mergers.
- (vi) Pursuant to 18 C.F.R. §358.4(b)(3)(vi), Guardian's postings will comply with the requirements of 18 C.F.R. §§284.12(a) and §§284.12 (b)(3)(v).

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(c) Transfers.

Pursuant to 18 C.F.R. §358.4(c), Operator requires that the Director of HR will identify information necessary for posting a notice on Guardian's Internet website of any employee transfer between Guardian and an Energy Affiliate and that the posting include: the name of the transferring employee, the respective titles held while performing each function (i.e., on behalf of Guardian or the Energy Affiliate), and the effective date of the transfer. The procedure provides that the posting will remain on the Guardian Internet website for 90-days. Such information shall be posted on the Internet website located at <http://www.guardianpipeline.com> under Informational Postings; Category-Energy Affiliate Info; Subcategory-Employee Transfers.

Guardian has identified all companies that qualify as an Energy Affiliate, as that term is defined in 18 C.F.R. Part 358, has provided for a procedure to update this list no later than seven (7) business days of any change and to use this list in the determination of when a transfer between Guardian and an Energy Affiliate occurs. Operator has also implemented procedures for transfers to and from an Energy Affiliate which provide that on the date of transfer there will be (i) a change in employee's access to company IT applications, (ii) deletion of the employee from all distribution lists of the company from which the employee transfers and (iii) the provision of a copy of the SOC to the employee. If the transfer is to Guardian or Operator, the procedures provide for SOC training within the first week of employment with Guardian or Operator. If the transfer is to an Energy Affiliate, the procedures provide for an exit interview and the execution of a commitment not to be a conduit of information from Guardian to the Energy Affiliate. The Director of HR is responsible for reviewing with the CCO the transfer of the employee and for ensuring that the transfer is posted. The Director of HR and the CCO are responsible for ensuring that there is no cycling of employees between Guardian and its Energy Affiliate(s).

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(d) Books and records.

Pursuant to 18 C.F.R. §358.4(d), Guardian will maintain its books of account and records (as prescribed under 18 C.F.R. Parts 101, 125, 201 and 225) separately from those of its Energy Affiliates and these will be available for Commission inspections.

(e) Written Procedures.

Regarding the following requirements under this Section (e), Operator has fulfilled and carried out such requirements and has maintained the necessary documentation.

- (1) Pursuant to 18 C.F.R. §358.4(e)(1), Guardian's Informational Filing with the Commission was made on February 9, 2004 and it was posted on its Internet website until September 22, 2004.
- (2) Pursuant to 18 C.F.R. §358.4(e)(2), Guardian is in compliance with the SOC set forth in 18 C.F.R. Part 358 as of September 22, 2004.
- (3) Pursuant to 18 C.F.R. §358.4(e)(3), Guardian posted on its Internet website its Implementation Procedures on September 22, 2004.
- (4) Pursuant to 18 C.F.R. §358.4(e)(4), Operator distributed its SOC posting to its Energy Affiliates and all employees of Guardian by September 22, 2004.

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- (5) Pursuant to 18 C.F.R. §358.4(e)(5), Operator shall train officers and directors as well as employees with access to transmission information or information concerning gas or electric purchases, sales, or marketing functions. The Operator shall require each employee to sign a document or certify electronically signifying that s/he has participated in the training.
- (6) Pursuant to 18 C.F.R. §358.4(e)(6), Operator has designated a CCO as follows:

RAYMOND D. NEPPL
VICE PRESIDENT, REGULATORY AFFAIRS & MARKET SERVICES
NORTHERN PLAINS NATURAL GAS COMPANY, LLC
13710 FNB PARKWAY
OMAHA, NEBRASKA 68154-5200
(402) 492-7428
RAY.NEPPL@NBORDER.COM

The CCO will be responsible for implementation and maintenance of the SOC compliance, posting of the SOC, and employee training. The CCO will make arrangements to conduct internal audits on a periodic basis to ensure continued compliance with the SOC. The Operator's Code of Conduct has established an independent, third-party hotline which will allow employees to anonymously report any facts or incidents for investigation concerning SOC. The CCO shall be responsible for investigating each contact with the hotline concerning SOC and taking any appropriate measures. The CCO shall maintain a record of each of the contacts with the hotline and the disposition of each investigation.

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§358.5 NON-DISCRIMINATION REQUIREMENTS.

(a) Information access.

- (1) Pursuant to 18 C.F.R. §358.5(a)(1), Operator has conducted training instructing that any employee of any Energy Affiliate may only have access to transmission information available to Guardian's transmission customers via postings on Guardian's Internet website and must not have access to any transmission information about Guardian's system that is not available to all users of the Guardian Internet website. Currently, there are no employees of any Energy Affiliate with non-public area access to Guardian's or Operator's office building and to Operator's IT databases containing Guardian's transmission information. Consequently, Guardian's transmission information is secure on a day-to-day basis from employees of Energy Affiliates. In the event an employee of an Energy Affiliate would visit Operator's office building, the visiting employee would be accompanied by an Operator employee who would monitor the activities of the employee of the Energy Affiliate to ensure that no transmission data is available to that employee. Operator has transmitted its SOC procedures to all of its Energy Affiliates for distribution to the Energy Affiliates' employees.

- (2) Pursuant to 18 C.F.R. §358.5(a)(2), Guardian's procedures specify and Operator has conducted training instructing that any employee of an Energy Affiliate is prohibited from obtaining information about Guardian's transmission system (including, but not limited to, information about available transmission capability, price, curtailments, storage, ancillary services, balancing, maintenance activity, capacity, expansion plans, or similar information) through access to transmission information not posted on the Guardian Internet website or that is not otherwise also available to the general public without restriction.

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Transportation service requests are maintained by Operator in computer databases located in Operator's office building in Omaha, Nebraska. Access to these databases is limited to Operator personnel. The procedures to protect confidential databases are as follows:

- (i) Confidential databases are physically stored on a secured local area network environment to prevent unauthorized access.
- (ii) The network file server and network communications server are physically located in a locked room accessible only to Operator's systems operations personnel.
- (iii) System operations personnel perform network administrator functions including, but not limited to, physical hardware connection, user identification assignments and password initialization, program and data access controls for individual network users, and system backup.
- (iv) Database access is provided only to personnel who have a business requirement to add, update, or view the data contained in the database. For multi-user, multi-access databases, update capability is provided only to personnel who have a business requirement to change data. For personnel who have a business requirement to view the information contained in the database, read-only capability is provided.
- (v) To protect the network from unauthorized dial-up access, additional security measures have been implemented:
 - a) Dial-up users must use Virtual Private Network (VPN) communications software package;

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b) The VPN dial-up option requires active directory authentication;

(vi) Regarding the shared electronic communication systems, instructions to Guardian and Operator's employees have been provided to ensure that their calendars and electronic mail are not accessed by Energy Affiliate employees.

(b) Prohibited disclosure.

(1) Pursuant to 18 C.F.R. §358.5(b)(1), Operator has conducted training instructing that Guardian or Operator's employees may not disclose to employees of Guardian's Energy Affiliates any information concerning the transmission system of Guardian or the transmission system of another (including, but not limited to, information received from non-affiliates or information about available transmission capability, price, curtailments, storage, ancillary services, balancing, maintenance activity, capacity, expansion plans, or similar information) through non-public communications conducted off the Guardian Internet website or through access to information not posted on the Guardian Internet website that is not contemporaneously available to the public.

(2) Pursuant to 18 C.F.R. §358.5(b)(2), Operator has conducted training instructing that Guardian or Operator employees may not share any information acquired from non-affiliated transmission customers or potential nonaffiliated transmission customers, or developed in the course of responding to requests for transmission service on the Guardian Internet website, with employees of its Energy Affiliates, except to the limited extent information is required to be posted on the Guardian Internet website in response to a request for transmission service. The Operator's procedures for handling a request for information that is not public, is to refer the requestor to the Guardian Internet website.

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- (3) Pursuant to 18 C.F.R. §358.5(b)(3), Operator has conducted training instructing that if an employee of Guardian or Operator discloses information in a manner contrary to the requirements of §358.5(b)(1) and (2), the employee will notify the supervisor of his/her department and the CCO, who will immediately post such information on the Guardian Internet website.

- (4) Pursuant to 18 C.F.R. §358.5(b)(4), a non-affiliated transmission customer may voluntarily consent, in writing, to allow Guardian to share the non-affiliated customer's information with the Guardian Energy Affiliates. If a non-affiliated customer authorizes Guardian to share its information with Guardian's Energy Affiliates, Guardian shall post notice on its Internet website of the consent along with a statement that Guardian did not provide any preferences, either operational or rate-related, in exchange for voluntary consent. Such information shall be posted on Guardian's Internet website located at <http://www.guardianpipeline.com> under Informational Postings; Category-Non-discrimination Rqts; Subcategory-Information Disclosure.

- (5) Pursuant to 18 C.F.R. §358.5(b)(5), Guardian's procedures specify and Operator has conducted training instructing that Operator will not be required to contemporaneously disclose to all transmission customers or potential transmission customers information covered by §358.5(b)(1) if it relates solely to an Energy Affiliate's specific request for transmission service.

- (6) 18 CFR §358.5(b)(6) does not apply to natural gas companies.

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- (7) Pursuant to 18 C.F.R. §358.5(b)(7), Operator’s training of all employees and training of new employees shall make it clear that neither Guardian nor an employee of Operator is permitted either to be, or to use anyone as, a conduit for sharing Guardian or other transmission provider’s customer information covered by the prohibitions of §358.5(b)(1) and (2) with its Energy Affiliates. All Guardian and Operator employees are trained with regard to this requirement. In addition, all employees the Operator shares with Energy Affiliates certify that they will not be a conduit for Energy Affiliates to obtain access to Guardian’s transmission information.

- (8) Pursuant to 18 C.F.R. §358.5(b)(8), Operator has conducted training instructing that Guardian and Operator are permitted to share operating information necessary to maintain the operations of the transmission system with its Energy Affiliates.

(c) Implementing tariffs.

- (1) Pursuant to 18 C.F.R. §358.5(c)(1), Operator has conducted training instructing that Guardian and Operator 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.

- (2) Pursuant to 18 C.F.R. §358.5(c)(2), Operator has conducted training instructing that Guardian and Operator will 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 non-discriminatory manner, if these tariff provisions permit the use of discretion.

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- (3) Pursuant to 18 C.F.R. §358.5(c)(3), Operator has conducted training instructing that Guardian and Operator must process all similar requests for transmission in the same manner and within the same period of time.

- (4) Pursuant to 18 C.F.R. §358.5(c)(4), Guardian and Operator maintain a written log, available for Commission audit, detailing the circumstances and manner in which they exercised discretion under any terms of the tariff. Operator will post the information contained in this log on its Internet website at <http://www.guardianpipeline.com> under Informational Postings; Category-Non-discrimination Rqts; Subcategory-Tariff Discretionary Actions within 24-hours of when Guardian or Operator exercises discretion under any terms of the tariff. A posting that is already mandated by the tariff or other requirement, such as operational flow orders, available capacity, or curtailment will not require a duplicative posting.

- (5) Pursuant to 18 C.F.R. §358.5(c)(5), Operator has conducted training instructing that Guardian and Operator may not, through the Guardian tariff or otherwise, give preference to Energy Affiliates over any other wholesale customer, 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) Discounts.

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Pursuant to 18 C.F.R. §358.5(d), Operator has implemented a mechanism in its computer system that posts on Guardian’s Internet website notice of any offer of a discount for any transmission service made by Guardian contemporaneously with the time that the offer is contractually binding. The posting includes: the name of the customer involved in the discount and whether it is an affiliate or whether an affiliate is involved in the transaction; the rate offered; the maximum rate; the time period for which the discount is to apply; the quantity of gas that the discount was based on; the delivery points under the transaction; and any conditions or requirements applicable to the discount. Operator shall post discounts for sixty (60) days on Guardian’s Internet website located at <http://www.guardianpipeline.com> under Informational Postings; Category-Non-discrimination Rqts; Subcategory-Discounts.