



Colorado Springs Utilities

*It's how we're all connected*

# **STANDARDS OF CONDUCT COMPLIANCE PLAN**

Approved By,

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## 1.0 PURPOSE

This Standards of Conduct Compliance Plan (“Compliance Plan”) outlines the procedures by which Colorado Springs Utilities will ensure behavior that consistently supports compliance with the Federal Energy Regulatory Commission (FERC) Standards of Conduct, as set forth in 18 C.F.R. Part 358. It serves as the official written framework for implementing these standards. The Plan specifically governs communications involving Transmission Function Employees (TFEs), including those with access to Transmission Function Information, and Marketing Function Employees (MFEs). All Colorado Springs Utilities employees are required to comply with both this Compliance Plan and the FERC Standards of Conduct.

## 2.0 BACKGROUND

The FERC Standards of Conduct are designed to ensure that Colorado Springs Utilities, in its capacity as a transmission owner and a transmission customer, does not grant preferential treatment or share transmission-related information in ways that could unfairly benefit its own or Affiliated sales, thereby undermining competitive markets. These standards are built on four foundational principles:

- **Non-Discrimination:** Transmission providers must treat all transmission customers on a non-discriminatory basis. They must not grant undue preference or advantage to any person or impose on any person undue prejudice in the transportation or wholesale sale of natural gas or electric energy in interstate commerce.
- **Independent Functioning:** TFEs must operate independently from MFEs, except as permitted under 18 C.F.R. Part 358 or by Commission order.
- **No-Conduit Rule:** Transmission providers and their employees, contractors, consultants, and agents are prohibited from disclosing Non-Public Transmission Function Information (NPTFI) to MFEs, either directly or indirectly.
- **Transparency:** If NPTFI is disclosed to MFEs, it must also be made available to all transmission customers unless otherwise permitted by regulation or Commission order.

Based on these principles, the FERC Standards of Conduct establish four general rules:

1. Non-Discrimination Requirements (See Section 7.0)
2. Independent Functioning Rule (See Section 8.0)
3. No-Conduit Rule (See Section 9.0)
4. Transparency Rule (See Section 10.0)



### 3.0 SCOPE AND APPLICABILITY

In accordance with the Federal Power Act, 16 USC § 824(e), Colorado Springs Utilities is not subject to FERC jurisdiction under 18 CFR §358.1, however Colorado Springs Utilities voluntarily complies with the FERC Standards of Conduct pursuant to the reciprocity rule. Under the RTO Membership Agreement, Colorado Springs Utilities retains its non-jurisdictional status while placing its transmission facilities under a FERC-jurisdictional tariff. This subjects those facilities to FERC oversight and imposes Transmission Owner obligations through RTO participation. As a Transmission Owner seeking open access transmission service under the Southwest Power Pool (SPP) Tariff, Colorado Springs Utilities adopts these standards to ensure transparency and non-discriminatory practices.

Colorado Springs Utilities receives and shares NPTFI with non-Affiliated interconnected entities as necessary to ensure the safe, reliable, and efficient operation of its electric transmission system in coordination with the broader network managed by SPP. In accordance with the FERC Standards of Conduct, Colorado Springs Utilities and its non-Affiliated interconnected entities must ensure that any dissemination of NPTFI complies with regulatory requirements. Colorado Springs Utilities is committed to treating all entities in a non-discriminatory and non-preferential manner.

### 4.0 TERMS AND DEFINITIONS

Capitalized terms used in this Compliance Plan are defined in the FERC Standards of Conduct, codified in 18 C.F.R. Part 358. The definitions provided below are intended to supplement those regulatory definitions. In the event of any discrepancy between a definition in this Compliance Plan and the definition in the FERC Standards of Conduct, the regulatory definition shall prevail.

**Internet website** refers to Internet locations where Colorado Springs Utilities posts the information, by electronic means, required under 18 C.F.R. Part 358. As used in this Compliance Plan, Internet website is a reference to either Colorado Springs Utilities' public Internet website or Colorado Springs Utilities' web pages on SPP's Open Access Same Time Information System (OASIS).

**Marketing function employee (MFE)** 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.

**Transmission function employee (TFE)** 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.



**Other Employee** means an employee, contractor, consultant, or agent of Colorado Springs Utilities or of an affiliate of Colorado Springs Utilities who is not classified as a TFE or an MFE.

**Non-Affiliated** means any contractor, consultant, vendor, or agent with whom Colorado Springs Utilities maintains only a contractual or service-based relationship, without any ownership, control or corporate governance connection.

## 5.0 RESPONSIBILITIES

### 5.1 Colorado Springs Utilities Employees

All Colorado Springs Utilities employees are individually responsible for compliance with the FERC Standards of Conduct and this Compliance Plan.

### 5.2 Chief Compliance Officer (CCO)

- Is Colorado Springs Utilities' Chief Human Resources Officer.
- Maintains overall responsibility for compliance with the FERC Standards of Conduct.
- Appoints a Regulatory and Compliance Program Manager to implement the Standards of Conduct program and ensure daily compliance with its requirements.

### 5.3 RTO Regulatory and Compliance Program Manager

By virtue of the CCO's signature on this document, the RTO Regulatory and Compliance Program Manager is appointed to carry out the responsibilities set forth below:

- Implements, maintains, and monitors compliance with FERC Standards of Conduct and this Compliance Plan.
- Responsible for the content of these procedures and is responsible for ensuring that these procedures comply with the FERC Standards of Conduct and any future regulations adopted by the Commission.
- Provides guidance regarding compliance with the FERC Standards of Conduct to all affected employees, in consultation with the Office of the City Attorney for Colorado Springs.
- Ensures that all matters related to the FERC Standards of Conduct are properly documented and retained in accordance with applicable statutory and regulatory requirements to support compliance and audit readiness.



## **6.0 MONITORING AND ENFORCEMENT**

If an employee becomes aware of or suspects a potential violation of the FERC Standards of Conduct or the Compliance Plan, the employee must report it immediately to their supervisor or the RTO Regulatory and Compliance Program Manager. An immediate notification is a proactive step that demonstrates responsibility and commitment to ethical conduct. Reporting potential violations early helps fix problems quickly and can lead to less severe consequences.

The RTO Regulatory and Compliance Program Manager will gather as much information as possible, including but not limited to, a detailed description of the potential violation and how it occurred; the extent of harm, if any, caused by the potential violation; any steps taken to remedy the potential violation; and any relevant documents or communications.

The CCO, or designee, is responsible for evaluating every report without delay and determining the appropriate next steps, which may include posting, further investigation, or additional reporting.

Upon resolution of the violation, key lessons learned will be reviewed and documented. The lessons learned will be incorporated into the following year's annual compliance training to strengthen awareness and prevent future violations.

## **7.0 NON-DISCRIMINATION REQUIREMENTS (18 CFR §358.4)**

### **7.1 General Rule (18 C.F.R. §358.4(a-d))**

Transmission providers must strictly enforce tariff provisions when no discretion is allowed and apply those that permit discretion in a fair and impartial manner. They are prohibited from granting undue preference to any party in matters related to transmission service, including pricing, scheduling, and ancillary services. Additionally, all similar transmission requests must be processed consistently and within the same timeframe.

As of April 1, 2026, Colorado Springs Utilities became a full member of SPP, a FERC-approved RTO. Colorado Springs Utilities transferred functional control of its transmission facilities to SPP, which now administers transmission service over Colorado Springs Utilities owned assets under the terms and conditions of the SPP Open Access Transmission Tariff (Tariff). Colorado Springs Utilities operates its transmission facilities at SPP's direction and does not control or bear responsibility for enforcement of the Tariff provisions, the sale or provision of transmission service, or the processing of transmission service requests. These functions are managed by SPP in accordance with its regulatory obligations and market protocols.



As a transmission owner operating under the Tariff, Colorado Springs Utilities is responsible for supporting the non-discriminatory provision of transmission service. While SPP administers the Tariff and manages transmission service requests, Colorado Springs Utilities must:

- Maintain and operate its transmission facilities in a manner that supports equal access and reliability for all transmission customers, regardless of affiliation.
- Coordinate with SPP to ensure that transmission service is provided impartially and without undue preference, including during curtailments, scheduling, and outage planning.
- Provide timely and consistent data and operational support to SPP to help ensure that similar transmission service requests are processed uniformly.
- Avoid actions or communications that could result in preferential treatment of Affiliated entities or discriminatory practices in the use of Colorado Springs Utilities' transmission assets.

## **8.0 INDEPENDENT FUNCTIONING RULE (18 CFR §358.5)**

### **8.1 General Rule (18 C.F.R. §358.5(a))**

The rule requires that TFEs operate independently from MFEs, with no overlap in duties or access to transmission operations facilities or information.

Colorado Springs Utilities owns both transmission and distribution assets and engages in marketing functions, including energy trading and resource planning. As of April 1, 2026, Colorado Springs Utilities became a full member of SPP, transferring functional control of its transmission facilities to the RTO. While SPP administers transmission service and system operations, Colorado Springs Utilities retains responsibility for operating its assets in accordance with SPP directives and FERC regulations as applicable.

### **8.2 Separation of Functions (18 C.F.R. §358.5(b))**

A transmission provider must ensure that its MFEs do not conduct transmission functions or have access to transmission operations facilities beyond what is available to other transmission customers. Likewise, TFEs are prohibited from engaging in marketing functions.

Colorado Springs Utilities will ensure that its TFEs operate independently from MFEs, which includes (1) maintaining organizational separation between employees who manage transmission



operations and those involved in energy marketing or sales; (2) restricting access to transmission-related information, ensuring MFEs do not receive NPTFI unless permitted by regulation; and (3) implementing internal controls, training, and monitoring to prevent coordination or information sharing between TFEs and MFEs.

Access to Colorado Springs Utilities' transmission operations facilities is strictly limited to TFEs and other authorized personnel supporting system operations. Colorado Springs Utilities prohibits MFEs from accessing system control centers used for transmission operations. Access is managed through physical security measures and procedural controls to ensure compliance with the Independent Functioning Rule under the FERC Standards of Conduct. Colorado Springs Utilities employees are not permitted to grant MFEs access to transmission operations areas under any circumstances.

In addition to maintaining physical separation between TFEs and MFEs, Colorado Springs Utilities administers cybersecurity programs to control access to its computer systems. These controls ensure that unauthorized personnel, including MFEs and employees of non-Affiliated entities, cannot access transmission-related systems or NPTFI.

## **9.0 NO CONDUIT RULE (18 CFR §358.6)**

### **9.1 Prohibited Communications**

Colorado Springs Utilities employees, contractors, consultants or agents shall not disclose NPTFI to MFEs or MFEs of non-Affiliated entities, except as permitted under 18 C.F.R. §358.7(h)(2)(I) or (ii), as outlined in Section 9.2 of this Compliance Plan. Before sharing any NPTFI with MFE employees, Colorado Springs Utilities personnel must verify whether the recipient is authorized under FERC regulations. Employees should consult a supervisor or the RTO Regulatory and Compliance Program Manager for guidance.

Colorado Springs Utilities employees, contractors, consultants or agents are strictly prohibited from using any individual as a conduit to transmit NPTFI to MFEs or MFEs of non-Affiliated entities. MFEs may attend meetings with other Colorado Springs Utilities personnel only if NPTFI is not disclosed. For the purposes of this Compliance Plan, "meetings" include in-person discussions, phone calls, and virtual conferences. TFEs and Other Employees must not disclose NPTFI to any individual who may act as a conduit to MFEs or MFEs of non-Affiliated entities, with the intent to provide an undue competitive advantage in the wholesale electric marketplace.

Colorado Springs Utilities employees should clearly label all emails, documents, and communications containing NPTFI in accordance with the Document Labeling Procedures in Appendix B.



## **9.2 Permitted Communications/Exceptions (18 C.F.R. §358.7(h))**

In the day-to-day operation of Colorado Springs Utilities' transmission and distribution systems, TFEs, MFEs and Other Employees may receive NPTFI when necessary to ensure safe and reliable system operations and compliance with North American Electric Reliability Corporation (NERC) Reliability Standards (see §358.7(h)(2)(i)). In accordance with §358.7(h)(2)(ii), Colorado Springs Utilities may share NPTFI with employees of non-Affiliated interconnected entities if the information is necessary to maintain or restore operation of the transmission system or generate capacity, and if such information is shared to comply with a Commission-approved Reliability Standard.

In limited circumstances where TFEs disclose NPTFI to MFEs as permitted under 18 C.F.R. §358.7(h)(2)(i) and (ii), Colorado Springs Utilities will create and retain a contemporaneous record of all exchanges, except during emergencies such as catastrophic maintenance failure or severe weather events that significantly disrupt service. In such emergencies, the record must be created as soon as practicable after the event. Records may be made available to the Commission upon request and retained for five years. Acceptable formats include handwritten or typed notes, electronic communications (e.g., emails, text messages), recorded phone calls, and similar documentation.

As an exception to the contemporaneous disclosure requirement, Colorado Springs Utilities is not required to make contemporaneous disclosures for specific transaction information. In accordance with §358.7(b), TFEs may discuss with MFEs a specific request for transmission service submitted by the MFE. For such specific requests, contemporaneous disclosure under §358.6 is not required, provided the information pertains solely to the MFE's individual transmission service request.

## **10.0 TRANSPARENCY RULE (18 CFR §358.7)**

Colorado Springs Utilities will administer and maintain an Internet website (as defined in this Compliance Plan) to facilitate compliance with 18 C.F.R. §358.7. The Internet website will be used to make contemporaneous disclosures of information, post written procedures, and identify required employee information. The website will be organized to ensure that all required postings are sufficiently prominent and readily accessible to the public.

The RTO Regulatory and Compliance Program Manager is responsible for overseeing and ensuring that Colorado Springs Utilities' Internet website complies with the requirements of 18 C.F.R. §358.7, as outlined in this section. The Program Manager ensures that all required informational postings are properly maintained and updated, ensuring data is accurate and current. The CCO must authorize and document any suspension of postings and, if necessary,



request the Commission extend an exemption from posting requirements beyond the initial 30-day period.

#### **10.1 Contemporaneous Disclosures (18 C.F.R. §358.7(a))**

If NPTFI is disclosed in a manner contrary to the requirements of §358.6, Colorado Springs Utilities will immediately post the disclosed information on Colorado Springs Utilities' Internet website.

If NPTFI is disclosed in a manner contrary to the requirements of §358.6, which includes customer information or Critical Energy/Electric Infrastructure Information (CEII) as defined in 18 CFR §388.113(c)(1), or any other information the Commission by law has determined to be subject to limited dissemination, Colorado Springs Utilities will immediately post notice on its Internet website that such information was disclosed. For such instances of disclosure, the specific information exchanged will not be posted to Colorado Springs Utilities' Internet website. However, a notice indicating that a disclosure occurred will be posted to ensure transparency and compliance with applicable regulatory requirements.

#### **10.2 Voluntary Consent (18 C.F.R. §358.7(c))**

Colorado Springs Utilities may disclose a transmission customer's non-public information to its MFEs only if the transmission customer voluntarily provides written consent authorizing such disclosure. Upon receiving written consent, Colorado Springs Utilities will post a notice of the customer's authorization on its Internet website. This notice will include a statement affirming that no preferences, operational or rate-related, were provided in exchange for the customer's consent.

#### **10.3 Posting Written Procedures on Colorado Springs Utilities' Internet website (18 C.F.R. §358.7(d))**

Colorado Springs Utilities will post on its Internet website this Compliance Plan, which contains the procedures for implementing the FERC Standards of Conduct.

#### **10.4 Identification of Affiliate Information on Colorado Springs Utilities' Internet website (18 C.F.R. §358.7(e)(1)-(3))**

Colorado Springs Utilities' Internet website will also include a list of the employee-staffed facilities shared by TFEs and MFEs. Colorado Springs Utilities shares certain physical facilities between TFEs and MFEs. Although these employees occupy separate, access-controlled areas within the same location, the facility is considered shared under 18 C.F.R. §358.7(e)(2).



Accordingly, Colorado Springs Utilities will post a summary of the types of shared facilities and their addresses on its Internet website.

The Standards (18 C.F.R. §358.7(e)(1)) require utilities to post and maintain on their Internet website the names and addresses of any Affiliates that employ and retain MFEs. Colorado Springs Utilities has no Affiliates as that term is defined by 18 CFR §358.3(a). If it did, it would comply with this requirement.

The Standards (18 C.F.R. §358.7(e)(3)) require utilities to post information on their Internet website about any potential merger partners and clearly identify them as affiliates that may employ or retain MFEs. Consistent with regulatory requirements, this information must be publicly posted within seven calendar days of the merger's public announcement. Colorado Springs Utilities does not have, nor does it expect to have, any merger partners. If it did, it would comply with this requirement.

#### **10.5 Identification of Employee Information of Colorado Springs Utilities' Internet Website (18 C.F.R. §358.7(f))**

Colorado Springs Utilities will post on its Internet website the job titles and job descriptions of all employees that have been identified as TFEs.

Colorado Springs Utilities will post on its Internet website notice of any employee transfers that involve the transfer of a TFE to a position as an MFE, or any transfer of an MFE to a position as a TFE. The information to be posted will include the name of the transferring employee, the respective title(s) held while performing each function (i.e., as a TFE and as an MFE), and the effective date of the transfer. All postings of employee transfers shall remain on the Internet website for a minimum of 90 days.

#### **10.6 Timing and General Requirements of Postings on Colorado Springs Utilities' Internet Website (18 C.F.R. §358.7(g))**

If any changes occur to information required under Part 358, Colorado Springs Utilities will update its Internet website within seven days of the change. Each update will include the date it was posted.

#### **10.7 Suspension of Posting Requirements Due to Emergency Conditions (18 C.F.R. §358.7(g)(2))**

If Colorado Springs Utilities' business operations are severely disrupted by an emergency condition such as an ice storm, earthquake, flood, fire or tornado, Colorado Springs Utilities may suspend the posting requirements of Part 358. The suspension of posting requirements will be



authorized by the CCO and documented by the RTO Regulatory and Compliance Program Manager. If posting cannot be completed within 30 days, additional authorization to extend the suspension of posting requirements may be required. If the CCO determines that an emergency condition will continue to significantly disrupt operations beyond this period, the CCO may notify the Commission and request authorization to extend the exemption from posting requirements.

## **11.0 IMPLEMENTATION REQUIREMENTS (18 CFR §358.8)**

In accordance with §358(b)(1), Colorado Springs Utilities shall implement measures to ensure compliance with the “independent functioning” and “no-conduit” provisions. These measures include coordinated communications with applicable non-Affiliated interconnected entities, and the distribution of the Colorado Springs Utilities Compliance Plan to relevant employees of Colorado Springs Utilities. The Compliance Plan is also posted on the Colorado Springs Utilities Internet website.

Additionally, a training program is provided for TFEs, MFEs, executives, and other personnel who may have access to Transmission Function Information. Oversight of these compliance efforts is managed by the RTO Regulatory and Compliance Program Manager, who is responsible for monitoring adherence to the Standards of Conduct.

### **11.1 Distribution of Compliance Plan (18 C.F.R. §358.8(b)(2))**

A copy of Colorado Springs Utilities’ Compliance Plan will be distributed annually and whenever updated to all employees required to complete the annual Standards of Conduct training, typically at the time the training is administered. The Compliance Plan will also be accessible to all employees via Colorado Springs Utilities’ Intranet website. Any hard copy reproductions of this Compliance Plan should be verified against the on-line system for current revisions.

### **11.2 Training (18 C.F.R. §358.8(c)(1))**

Colorado Springs Utilities provides annual Standards of Conduct training to all its TFEs, MFEs, officers, supervisory personnel and any other employees likely to become privy to NPTFI. Training records are maintained by University of Springs Utilities and are reviewed and updated as needed by the RTO Regulatory and Compliance Program Manager, and at least annually.

In 2026, Standards of Conduct training will be delivered in a traditional classroom format or an online module. In future years, the training will primarily shift to a computer-based module, with employees certifying completion electronically. New employees identified as requiring the training will complete it within the first 30 days of employment, and on an annual basis thereafter.



**11.3 Designation of Chief Compliance Officer (CCO) (18 C.F.R. §358.8(c)(2))**

The Chief of Human Resources is the designated CCO and has appointed the RTO Regulatory and Compliance Program Manager as the individual responsible for ensuring day-to-day compliance with the Standards of Conduct. Contact information for the designated compliance officer will be posted on Colorado Springs Utilities’ Internet website.

**11.4 Books and Records (18 C.F.R. §358.8(d))**

The Standards require utilities to maintain its books and records independently from all Affiliated entities. These records must be kept separate and made available for Commission inspection upon request. Colorado Springs Utilities has no Affiliates as that term is defined by 18 CFR §358.3(a). If it did, it would comply with this requirement.

Version History

Version Number	Date	Comments
00	February 2026	New document



## **APPENDIX A: FERC STANDARDS OF CONDUCT**

The updated FERC Standards of Conduct rules can be found at the government's e-CFR site at:  
[eCFR :: 18 CFR Part 358 -- Standards of Conduct.](#)



## **APPENDIX B: DOCUMENT LABELING PROCEDURES**

This appendix outlines recommended standardized document labeling procedures to support compliance with the Standards of Conduct. Using these procedures helps minimize the risk of inadvertently sharing Non-Public Transmission Function Information with unauthorized personnel.

### 1. Emails

Emails containing NPFTI should include a subject line notation, such as:

CONFIDENTIAL - CONTAINS NON-PUBLIC TRANSMISSION FUNCTION INFORMATION

Emails containing NPTFI should also begin with a header, such as:

CONTAINS NON-PUBLIC TRANSMISSION FUNCTION INFORMATION  
DO NOT SHARE WITH MARKETING FUNCTION PERSONNEL

### How to Insert These Notices in Outlook

#### Using Templates in *New Outlook*

1. Open a new email in New Outlook.
2. Click the Templates button (usually found in the toolbar or message ribbon).
3. A templates menu will appear on the right side of the screen.
4. Click + Template (or Add Template) to create a new template.
5. Enter a title such as NPTFI Notice.
6. In the body of the template, add:

Subject:

CONFIDENTIAL – CONTAINS NON-PUBLIC TRANSMISSION  
FUNCTION INFORMATION

Message body header:

CONTAINS NON-PUBLIC TRANSMISSION FUNCTION INFORMATION  
DO NOT SHARE WITH MARKETING FUNCTION PERSONNEL

7. Save the template.

#### To Use the Template

1. Open a new email message.
2. Place your cursor where the header should go (top of the message body).
3. Open Templates, select your NPTFI Notice, and click it.
4. The text will be inserted automatically.



## 2. Word, PowerPoint, PDF Documents, etc.

For all routine documents, include the following warning on the first page, and where possible, on each subsequent page:

CONTAINS NON-PUBLIC TRANSMISSION FUNCTION INFORMATION  
DO NOT SHARE WITH MARKETING FUNCTION PERSONNEL

## 3. Excel Spreadsheets

For electronic spreadsheets, labeling may be included in the file name, such as:

“August1SystemStudy\_(Non-Public Transmission Function Information).xlsx”

Wherever possible, place the following notice near the top-left corner of the first sheet in the workbook and, if the spreadsheet may be printed, also add it to the header so it appears on all printed pages:

CONTAINS NON-PUBLIC TRANSMISSION FUNCTION INFORMATION  
DO NOT SHARE WITH MARKETING FUNCTION PERSONNEL

## 4. Electronic Document Repositories

When establishing a SharePoint site or any other electronic document repository, include the following warning prominently:

Warning: Please review and confirm that the material meets all FERC Standards of Conduct restricted access requirements before posting or transmittal.

If Colorado Springs Utilities’ intranet site contains any NPTFI, it must be appropriately secured so that Marketing Function personnel cannot access it. This includes operational transmission information, and other transmission-related details such as internal budgets or IT plans that impact the transmission system.

If you plan to include NPTFI in your site, file share, or public folder, you must obtain guidance on securing access so that only authorized employees can view the information under Standards of Conduct rules. The default setting for your repository may allow all employees to view the data. In such cases, you must take extra steps to protect such information and ensure access is properly restricted.