



**CODE OF CONDUCT COMPLIANCE
FOR CONTRACTORS & SUPPLIERS**

Revised October 8, 2009



**CODE OF CONDUCT
SUMMARY OF PRINCIPLES**

Code of Conduct

Summary of Principles

FortisAlberta bases its compliance on four “pillars” of conduct:

1. Fair treatment for customers
2. Fair treatment for retailers
3. Confidentiality of customer information
4. Good business practice in compliance with regulations

FortisAlberta, including its employees, officers, agents and contractors, are expected to comply with these four pillars of conduct at all times.

1. Fair Treatment for Customers

FortisAlberta has a duty to act without discrimination to ensure equal and fair treatment for customers.

For example, FortisAlberta must not encourage customers to acquire services from any one retailer. Customers receive fair treatment from FortisAlberta no matter which retailer serves them. All customers are free to decide which retailer they use, and must not be given the impression that they will receive preferential treatment if they select any particular retailer. No one retailer’s customers are given faster or better service than customers of other retailers. Because EPCOR is the default supplier of FortisAlberta, it is tempting to respond to a question about retailers by referring only to EPCOR. Any customer is free to choose a competitive retail electricity provider. Always provide the customer with the website address for the Office of the Utilities Consumer Advocate (“UCA”): www.UCAhelps.gov.ab.ca. If the customer does not have internet access, provide the customer with the phone number for the UCA (310-4822 toll-free within Alberta or 780-644-5130) or print the retailer list from the UCA website and fax or mail it to the customer.

2. Fair Treatment for Retailers

FortisAlberta has a duty to act without discrimination to ensure equal and fair treatment for retailers.

For example, If FortisAlberta proactively informs retailers of intended changes, it will inform all retailers at the same time and in the same manner. FortisAlberta will also not favour one retailer over another as discussed above.

3. Confidentiality of Customer Information

FortisAlberta is accountable for many pieces of confidential information. All that information is valuable and must be held in confidence. Information is a precious asset.

Disclosure of confidential information, whether intentional or accidental, can affect the financial stability of FortisAlberta as well as your relationship with FortisAlberta. Improper disclosure of confidential information may also have adverse legal or other consequences for FortisAlberta and others.

Because FortisAlberta records document the relationship with individuals such as employees, customers and suppliers, FortisAlberta also has an obligation to protect their privacy by safeguarding personal information. Therefore, it is important to treat all personal information as confidential as well.

4. Business Practices

Besides abiding by the Code of Conduct and FortisAlberta's Compliance Plan, it is also a contractor's obligation to ensure that all incidents of non-compliance are properly addressed. Events of non-compliance are opportunities to fill gaps and improve. FortisAlberta recognizes that people will make mistakes, and we continuously try to address those mistakes so that they are not repeated.

Examples of noncompliance:

- Publicly stating a retailer is too expensive or provides poor service.
- Providing customer information, either orally or in writing, to a retailer or to another party that is not authorized to have the information.
- Losing documents containing customer information.
- Giving advice to a customer about which retailer to select.

Report any event of non-compliance or possible noncompliance in writing (on paper or by e-mail) to FortisAlberta. Describe what happened and why you think it might be noncompliant. FortisAlberta will respond to you within a reasonable period of time; if not, you should forward your report to the Compliance Officer of FortisAlberta.

The Compliance Officer must be satisfied that the proper steps have been taken to resolve any noncompliance issues. If not, he will work with you to arrive at a satisfactory solution. All incidents of non-compliance are documented and retained for review by the Market Surveillance Administrator. These may also be included in the quarterly report to the Fortis Board of Directors and to MSA.

Compliance Officer: Robert Fink
 403-514-4083
 Bob.Fink@FortisAlberta.com

If your relationship with FortisAlberta ends, your obligations under the Code of Conduct do not. You may not share with others any information you learn as a result of your relationship with FortisAlberta.



**CODE OF CONDUCT
TRAINING MATERIAL**

Code of Conduct Training Material

Introduction

In June, 2004, FortisAlberta filed a Compliance Plan with the Market Surveillance Administrator that stated what we would do to comply with the *Code of Conduct Regulation*, created pursuant to the *Electric Utilities Act* (the *Code of Conduct Regulation* is also referred to herein as the “Code of Conduct”). As you know, some parts of our industry are no longer regulated, and this in itself can cause inconsistent and sometimes inequitable treatment of customers. It is important that customers are treated fairly and that customer information is not misused. The rules that govern the behaviour of retailers and wire owners in their dealings with customers and with each other are described in the Code of Conduct -- the subject of the training you are about to take.

It is extremely important to FortisAlberta's role in the industry that you learn what you must do to comply with the Code of Conduct. More than that, it is important that you take what you learn to heart and apply the principles to your job and in all your dealings with customers and retailers. By doing so, you will make a significant contribution in strengthening FortisAlberta's reputation as a company that treats customers and retailers with fairness and respect. In addition, we want to ensure that at no time is there a breach in the Code of Conduct as the penalties are severe and public.

Thank you for taking the time to learn about the Code of Conduct.

What is the Code of Conduct?

Customer choice in the electric industry came into effect on January 1, 2001, and has created opportunities for all parts of the industry to change the way they do business.

Because some parts of the industry are no longer regulated, it is important that rules are established to ensure customers and retailers are treated fairly and that customer information is safeguarded against misuse.

The principle of de-regulation is that the marketplace will be open to competitive forces in both the wholesale generation sector and in the retail sector, allowing more efficient, cost-effective and creative services. Customers have a choice over what retail services they wish to purchase and about which retailer they will choose to supply those services.

The main set of rules to protect customers is the *Code of Conduct Regulation*, which is regulation under the *Electric Utilities Act*. This regulation sets out rules for both retailers and wires owners, such as FortisAlberta, governing how they can interact with each other. This regulation ensures fair trading and allows equal opportunities for all retailers without compromising fair treatment of customers.

To comply with the *Code of Conduct Regulation*, FortisAlberta has filed a compliance plan (the “Compliance Plan”) with the Market Surveillance Administrator (“MSA”). This Compliance Plan lays out the steps FortisAlberta is taking to ensure it complies fully with the regulation. FortisAlberta’s Compliance Plan was approved by the MSA on June 30, 2004, and FortisAlberta is now legally obliged to follow through on its commitment.

FortisAlberta’s commitment includes training all contractors. This training gives you the information you need to comply with the *Code of Conduct Regulation* as you perform your duties at FortisAlberta.

Not all examples or situations described in this training will apply directly to you and your role with FortisAlberta. It is important, though, that you have a clear idea of what the law requires, what you must do to comply with these requirements, how this compliance affects you and your work, and what you need to do in an event of noncompliance.

Objectives

Once you have completed this training program, you will be able to:

- ensure you treat customers and retailers fairly;
- maintain customer confidentiality;
- describe how FortisAlberta’s business practices comply with the Code of Conduct; and
- identify and report non-compliance appropriately.

Examples of situations you may face include the following:

A customer asks you to recommend a retailer. What do you say?

EPCOR Energy Services Alberta Inc. (EPCOR) phones to ask for consumption information on a customer. Can you help?

ICQ wants aggregate consumption information for a group of irrigation customers. Can you provide it?

We’ll look at these questions again at the end of the training.

Resources

FortisAlberta provides the following resources that will help you to act in accordance with FortisAlberta's Compliance Plan.

Compliance Plan

FortisAlberta's Compliance Plan outlines what the company and its officers, employees, contractors and agents will do to comply with the Code of Conduct. FortisAlberta's Compliance Plan forms the basis of this training and is posted on the FortisAlberta website: www.fortisalberta.com.

The website is available to the public as well as to customers and retailers.

Supervisors

Your supervisor knows you and your work situation. Contact your supervisor whenever you are unsure about a compliance issue.

Compliance Officer

FortisAlberta's Compliance Officer is Robert Fink (phone: 403-514-4083, e-mail: bob.fink@fortisalberta.com). The Compliance Officer reviews all compliance issues and reports quarterly to the Market Surveillance Administrator. You can contact the Compliance Officer for any questions your supervisor cannot respond to.

1. Fair Treatment for Customers

FortisAlberta bases its compliance on four "pillars" of conduct:

- 1. Fair treatment for customers;**
2. Fair treatment for retailers;
3. Confidentiality of customer information; and
4. Good business practice in compliance with regulations.

FortisAlberta and its contractors have a duty to act without discrimination to ensure equal and fair treatment for customers.

Give customers the whole picture about retail choice

Contractors must not encourage customers to acquire services from any one retailer. You must not give the impression that customers must select a particular retailer in order to receive services from FortisAlberta. Customers must be provided access regardless of which approved retailer serves them or whether they have elected to remain on the regulated rate.

Because EPCOR is our default supplier, it is tempting to respond to a question about retailers by referring only to EPCOR. Any customer is free to choose a competitive retail electricity provider. Always provide the customer with the website address for the Office of the Utilities Consumer Advocate (“UCA”): www.UCAhelps.gov.ab.ca. If the customer does not have internet access, provide the customer with the phone number for the UCA (310-4822 toll-free within Alberta or 780-644-5130) or print the retailer list from the UCA website and fax or mail it to the customer.

Get the customer’s consent for any changes

Retailers must obtain the customer’s consent to request a change to a customer’s services. Because retailers are also governed by the Code of Conduct and in addition must comply with FortisAlberta’s Terms and Conditions of Distribution Access Service, you do not need to confirm these requests with the customer when a request is received from the retailer. Since these requests and switches are recorded in SAP, they can be compared to the retailers’ records if there is a complaint.

The only exception is that, sites with no retailer get sent to the default supplier for enrollment and EPCOR then enrolls the site and attempts to contact the customer to get enrollment information. As neither FortisAlberta nor EPCOR know who the customer is, there is no way to enroll the unknown person - just the site.

For example: XYZ Marketing calls you and requests that they be assigned as retailer for John Smith’s farm service. You should not set up XYZ as John Smith’s retailer based solely on a telephone conversation. All enrollments must be properly submitted in accordance with the Settlement System Code. Retailers are responsible for ensuring they have customer consent before enrollment.

Treat all customers equally

Customers receive fair treatment from FortisAlberta no matter which retailer serves them. All customers are free to decide which retailer they use, and must not be given the impression that they will receive preferential treatment if they select any particular retailer. No one retailer’s customers are given faster or better service than customers of other retailers. The same is true of costs for distribution service, all of which are set out in FortisAlberta’s Distribution Tariff and approved by the Alberta Utilities Commission (“AUC”).¹

For example:

Conditions of reconnecting service are the same no matter which retailer issues the order. As the orders come in, they are dispatched to the linemen and completed based on the priority identified in the request and in the most efficient manner usually geographic.

¹ AUC is one of two successor regulatory bodies created from the Alberta Energy and Utilities Board (“EUB”).

Be equally available to all customers and retailers

If your job includes participating in joint meetings with customers and retailers, make sure you are equally available no matter which retailer is involved.

For example:

A customer asks you to meet with her and a prospective retailer to discuss the load and service requirements for her new business. You do so. A couple of weeks later the customer asks for a second meeting, this time with a different retailer, to review revised service requirements. You must make every effort to be available for this second meeting, even if you have other work commitments and the customer appears not yet ready to commit to construction. It is important that you don't appear to be favouring one retailer over another by seeming reluctant to attend the second meeting.

2. Fair Treatment for Retailers

FortisAlberta bases its compliance on four "pillars" of conduct:

1. Fair treatment for customers;
- 2. Fair treatment for retailers;**
3. Confidentiality of customer information; and
4. Good business practice in compliance with regulations.

FortisAlberta and its contractors have a duty to act without discrimination to ensure equal and fair treatment for retailers.

All retailers are treated equally

All customers and retailers, including EPCOR, are subject to FortisAlberta's AUC-approved Distribution Tariff and are therefore treated equally. Besides the Distribution Tariff, FortisAlberta is also governed by the Settlement System Code, which requires that all retailers are subject to the same treatment by FortisAlberta for energy supply.

All retailers get information about changes at the same time

Before making changes to its regulated services or terms and conditions, FortisAlberta must apply to AUC. As part of this process, all stakeholders receive the relevant information at the same time and in the same manner.

Once an application is approved, AUC provides notice to the public in a non-discriminatory manner to ensure the resulting process is open and inclusive.

If FortisAlberta proactively informs retailers of its intended changes, it will inform all retailers at the same time and in the same manner.

For example:

If FortisAlberta planned to apply to AUC for a Transmission Adjustment rider, it could inform all retailers prior to making the application. This information would be provided to all retailers at the same time and in the same manner.

No retailer has access to FortisAlberta's written communication

FortisAlberta does not generally allow any retailer, including EPCOR, access to its written communications such as letters and e-mails. If FortisAlberta were to provide access to this communication, it would be provided to all the retailers at the same time and under the same terms and conditions.

Customers receive a complete list of retailers

If you are asked for information about retail services, you must not give the customer names of one or two retailers. Instead, direct the customer to the website of the Office of the Utilities Consumer Advocate ("UCA"): www.UCAhelps.gov.ab.ca. There, they will be able to access a list of all retailers that are currently licensed to provide service. If the customer does not have internet access, provide the customer with the phone number for the UCA (310-4822 toll-free within Alberta or 780-644-5130) or print the retailer list from the UCA website and fax or mail it to the customer.

Giving the name of a retailer gives an unfair advantage to that retailer. Remember that, particularly in smaller communities, you may be viewed as the "electricity expert" and that telling customers, even if they are friends or acquaintances, which retailer you have selected, implies that you have made the best choice. As a contractor, you are expected to act in the best interests of FortisAlberta Inc. to safeguard its reputation and prevent possible liability from any conflicts or even the appearance of a conflict. This means that you have a duty to follow through on FortisAlberta's commitment to treat all retailers without discrimination.

The following are some examples:

Example 1:

Wearing clothing with a retailers' logo while representing FortisAlberta may give the impression of a connection between the two companies. Remember, too, that in some jobs and locations you are always perceived as a representative of FortisAlberta. Especially in rural communities, you are the "power company" not only at work, but also in the grocery store, post office, and around the community.

Example 2:

At a social gathering in his neighborhood, Pete the PLT was asked which retailer he had selected. While it was tempting for Pete to answer the question, he simply told his

acquaintance that he had made a personal decision that was right for him and that it might not be the best decision for everyone. He then told his acquaintance where he could find the list of retailers and that each of them could provide their own information about contracts.

Example 3:

The owner of a house has found that her tenant has been disconnected and has vacated the premises. She calls FortisAlberta about reconnection. As she does not have a retailer of record, we **must** inform her to review the retailer options on the website of the Office of the Utilities Consumer Advocate (“UCA”) at www.UCAhelps.gov.ab.ca or to contact the UCA by telephone (310-4822 toll-free within Alberta or 780-644-5130). We **MUST NOT** direct the customer to the regulated rate provider to be reconnected. If the request is an emergency, the retailer directs the customer to the UCA website to locate the regulated rate provider for our service area.

Example 4:

A customer has been disconnected for non-payment. He calls FortisAlberta about reinstating service. Because the customer has a retailer of record, we can let him know it was his retailer that requested the disconnect. We can suggest he contact his retailer to make payment arrangements to ensure the service is energized.

We can add that if, after payment arrangements with the retailer of record have been made, he wishes to know all his retail options, we can give him the UCA website and phone number.

Example 5:

Z Energy calls to ask who the retailer is for a particular site.

You may not give this information, as doing so is a breach of the Code of Conduct. There are mechanisms in place, such as the Site ID catalogue, that enable retailers to confirm whether they are the retailer for a particular site. We may not tell them if retailer X or Y is billing a site.

3. Confidentiality of Customer Information

FortisAlberta bases its compliance on four “pillars” of conduct:

1. Fair treatment for customers;
2. Fair treatment for retailers;
- 3. Confidentiality of customer information;** and
4. Good business practice in compliance with regulations.

FortisAlberta is committed to keeping customer information confidential.

Guard customer information

FortisAlberta is accountable for many other pieces of customer information besides consumption information. All that information is valuable and may not be treated carelessly.

Information is a precious asset, every bit as valuable as money, property, equipment or skills. Disclosure of confidential information, whether intentional or accidental, can affect the financial stability of FortisAlberta as well as your job security.

Improper disclosure of confidential information may also have adverse legal or other consequences for our company and others.

Because company records document our relationship with employees, customers and suppliers, we also have an obligation to protect their privacy by safeguarding personal information. It is important to treat all customer information as confidential.

If you are travelling with a laptop or if you have documents with you, they must not be left for others to view. Documents containing customer information must be safeguarded at all times, and conversations that may include customer information must take place out of the hearing of those who do not have a need to know.

Get the consent of the customer if there is a request for disclosing their information

When you do have the customer's consent to disclose information, their consent must list what information can be disclosed, and to whom. It must also state the period of time for which this consent is in effect. Please note that this is more stringent than the requirements of privacy legislation (eg., *Personal Information Protection Act* or PIPA) that allows you to collect a more general consent from customers.

Disclose information to retailers at the same time

If a customer authorizes an owner to disclose his or her information to two or more retailers, the information must be sent to each of the retailers in the same manner, at the same time, and without letting each of those retailers know who else the information was disclosed to.

Disclose information within seven days

Once the customer authorizes the release of his or her information, that information must be disclosed within seven days.

If a retailer, other than the retailer of record, requests customer load information, they must first submit a release form that indicates they have authority to request this information.

FortisAlberta monitors that the customer has provided written consent by auditing a sample of these requests each quarter.

The form the retailers must complete (Permission to Release Electric Customer Load Data) is posted on the FortisAlberta web-site. These requests are handled by the Site Management Team.

Consumption information can be disclosed for the preceding 12 months

If the customer consents to historical electrical consumption being disclosed, the information must be provided within 15 days. The consumption must be for the 12-month period before the request. If there is no data for 12 months, the information given must be for the period during which the data has been collected.

For example:

If Mr. Bigbucks gives consent for his consumption history to be released to a retailer, but has only lived at that site for six months, that six-month history can be released. If he has lived at that site for two years, the most recent twelve-month history can be released.

Circumstances in which customer information can be disclosed without consent

Under certain circumstances, customer information can be disclosed without consent.

These are:

- to a default supplier or regulated rate provider appointed by the owner or to the customer's retailer;
- if required by law, subpoena, warrant, order of a court, person, or body which has jurisdiction to require the information be disclosed;
- to a peace officer as part of an investigation, unless the customer has expressly requested you do not disclose;
- as required or authorized by the MSA;
- for the purpose of billing customers or collecting a customer's unpaid bill; and
- customer information that is aggregated to such a degree that the information of an individual customer or retailer cannot be readily identified.

Aggregate Information

There are rules about how aggregate information can be made available. The aggregation service must be available to all retailers under the same terms and conditions. At least 24 hours before aggregated customer information is made available to a retailer, the owner must place a notice on its website that describes the information

and the cost of obtaining the information. This must be kept on the website for no less than 30 days.

As well, when FortisAlberta does provide aggregate information, the related notices are logged and archived.

What response would you recommend in the following situations?

Scenario One:

John Doe rents a house to Daniel Deadbeat. During February, the weather is extremely cold and John notices that there is smoke coming from the fireplace chimney of his rental property but there are no lights on. He notices the same thing two or three nights in a row. John, who is not on our records as being the customer at that site, is worried about water pipes and other plumbing fixtures freezing if the only heat in the house is from the fireplace. John calls Fortis to find out if the electricity to his rental property has been disconnected.

Can Fortis give him this information? Yes or No?

Yes is Correct. Fortis may tell John Doe whether electricity is flowing to the house or not, but they cannot tell him if power was cut off or terminated voluntarily. The status of bill payment is personal information.

Scenario Two:

The RCMP in Innisfail suspects a “grow op” in the Jane and John Doe residence and approach FortisAlberta for electricity usage over a certain period of time.

Can Fortis provide this information? Yes or No?

Yes is Correct. Consumption information can be released without consent when the use of the information is for the purposes of an investigation or a legal proceeding.

4. Business Practices

FortisAlberta bases its compliance on four “pillars” of conduct:

1. Fair treatment for customers;
2. Fair treatment for retailers;
3. Confidentiality of customer information; and
- 4. Good business practice in compliance with regulations.**

FortisAlberta is committed to conducting business with its retailers and affiliated retailer in such a way as to prevent unfair trading practices.

FortisAlberta does not make any arrangements with EPCOR that would result in unfair competitive advantages for EPCOR or its affiliates. This includes the sharing of facilities or services; joint acquisitions; sharing costs for research and development; selling leasing, giving or otherwise disposing of jointly acquired property; loans, guarantees, security, or other financial transactions.

Fortis maintains records and accounts that are separate from those of EPCOR Energy Services Alberta Inc. (EPCOR). Fortis must maintain sufficient information to enable an independent audit of its transactions with EPCOR and maintain these records for six years.

To ensure all retailers are treated fairly, any financial transaction between FortisAlberta and EPCOR, other than those that are included in the Distribution Tariff, are recorded in writing.

Report noncompliance appropriately

Besides abiding by the Code of Conduct and FortisAlberta's Compliance Plan, it is also your obligation to ensure that all incidents of non-compliance are properly addressed. Events of non-compliance are opportunities to fill gaps and improve.

Contractors will make mistakes, and we continuously try to address those mistakes so that they are not repeated.

Examples of noncompliance are:

- publicly stating a retailer is too expensive or provides poor service;
- providing customer information, either orally or in writing, to a retailer or to another party that is not authorized to have the information;
- losing documents containing customer information;
- giving advice to a customer about which retailer to select.

There are many other examples. If you are unsure whether you or someone else has contravened the Code of Conduct, please talk to your supervisor immediately.

What should you do?

Report any event of non-compliance or possible noncompliance in writing (on paper or by e-mail) to your supervisor.

Describe what happened and why you think it might be noncompliant.

Your supervisor will respond to you within seven days; if not, you should forward your report to the Compliance Officer.

How FortisAlberta addresses noncompliance

If a contractor has breached the Code of Conduct or FortisAlberta's Compliance Plan, such noncompliance will be dealt with under the terms of its contract and/or the contract could be terminated.

Managers and Supervisors

Ensuring the requirements of the Code of Conduct and the Compliance Plan are fulfilled falls within the normal duties of FortisAlberta's management.

FortisAlberta's senior management will be responsible for ensuring that all contractors take this training. Contractors, in turn, will be responsible for training their employees, contractors, officers and agents regarding compliance with the Code of Conduct and the Compliance Plan.

Managers will report instances of non-compliance to the Compliance Officer, including what was done to resolve the situation.

Compliance Officer

The Compliance Officer must be satisfied that the proper steps have been taken by management to resolve any noncompliance issues. If not, he will work with management to arrive at a satisfactory solution. All incidents of non-compliance are documented and retained for review by the MSA. These may also be included in the quarterly report to the Fortis Board of Directors and to MSA.

Compliance Officer: Robert Fink
 403-514-4083
 Bob.Fink@FortisAlberta.com

Leaving FortisAlberta?

If your relationship with FortisAlberta ends, your obligations under the Code of Conduct do not. Any officer, employee, agent or contractor of FortisAlberta who becomes an officer, employee, agent or contractor of a retailer must not use or disclose to the retailer any customer information obtained as a result of the relationship with Fortis. You may not share with others any customer information you learn as a result of your employment with FortisAlberta. This rule applies even when you are no longer employed with FortisAlberta.

Here are the three questions asked at the beginning of the session. Can you answer them now?

A customer asks you to recommend a retailer. Should you give a recommendation? Yes or No?

No, the customer should never be referred to a specific retailer but rather directed to the Office of the Utilities Consumer Advocate (“UCA”) website or given the UCA phone number or provided with a printout of the list of retailers from the UCA website.

EPCOR Energy Services Alberta Inc. phones to ask for consumption information on a customer. Can you give it to them?

Yes, but before providing any customer information to any retailer, ensure that the requesting retailer is the customer’s retailer of record. If not, you may not provide the information.

ICQ wants aggregate consumption information for a group of irrigation customers. Can you provide it? Yes or No?

Yes, aggregate client information can be provided through the aggregation service.

The retailer will be required to pay a fee that covers the cost of FortisAlberta providing this information. Before it is released, the information must be aggregated to such a degree that it cannot be used to identify consumption of individuals.

Definitions

Market Surveillance Administrator: The Market Surveillance Administrator (MSA) is an independent office established by the government of Alberta to monitor Alberta's electricity market for fairness and balance in the public interest.

Code of Conduct Regulation: The *Code of Conduct Regulation* was established under the *Electric Utilities Act* and sets out rules governing the conduct of owners and retailers, equality of treatment for customers and for retailers, confidentiality of customer information, prevention of unfair competitive advantages, and other aspects of the relationships between owners, retailers, and customers.

Affiliated retailer: Under certain conditions a retailers is considered to be affiliated with an owner. EPCOR Energy Services Alberta Inc. (EPCOR) is deemed to be affiliated with FortisAlberta because EPCOR is our regulated rate provider. Because EPCOR is our affiliated retailer, we need to be careful that we do not treat EPCOR in any way that would be considered to give them an unfair competitive advantage.

Owner: "Owner" means the owner of an electric distribution system. FortisAlberta owns the distribution system in its service area and is therefore an owner.

Customer Information: For the purposes of this training, "customer information" means information that is not available to the public and that is uniquely associated with a customer, could be used to identify the customer, or is provided by a customer to an owner.

Retailer of Record: The retailer of record is the retailer the customer has either selected (in the case of signing a contract) or defaulted to because he or she is on the regulated rate tariff or is receiving regulated default supply. A customer has only one retailer of record at any one time.



**CODE OF CONDUCT
COMPLIANCE PLAN**

CODE OF CONDUCT COMPLIANCE PLAN

Please review FortisAlberta's Compliance Plan, as amended from time to time and approved by the Market Surveillance Administrator, on the FortisAlberta website (www.FortisAlberta.com) under the heading "About Us"; "Regulatory", "Compliance" and then "FortisAlberta Code of Conduct Compliance Plan". Alternatively, click on the following link to the Compliance section of our website (<http://www.fortisalberta.com/Default.aspx?cid=184&lang=1>) and then click on "FortisAlberta Code of Conduct Compliance Plan".