

> Standards of Conduct

Shared Facilities

Pursuant to 18 CFR Section 358.7(e)(2)

Building and Building Services - Pine Needle's Transmission Function Employees do not share any building or building services with any Marketing Function Employees. A card key is required to access the office space that the personnel of Pine Needle's operator, Pine Needle Operating Company, LLC, occupy in its main facilities in Houston. The card key access system prohibits access by a Marketing Function Employee to Pine Needle Operating's Houston facilities. Marketing Function Employees, as with non-affiliated visitors, may enter Pine Needle Operating's office space after registering with a receptionist and providing identification, but no card key is provided and they must be escorted by Pine Needle Operating's personnel.

Computer Systems - Neither Pine Needle nor Pine Needle Operating share any computer systems with any Marketing Function Employees. Access to computer servers is restricted by access control mechanisms (such as user ids, passwords, FERC deny flag for Windows servers, visibility restriction of FERC IT components in the access control system).

Pine Needle follows the Williams Access Control process under which Pine Needle ensures that Marketing Function Employees do not have preferential computer access to non-public Transmission Function Information. On an ongoing basis a system access review is performed to assure that Marketing Function Employees do not have access to non-public Transmission Function Information. Any transfer by a Transmission Function Employee to a Marketing Function position is treated as a termination for access purposes, where old access is revoked prior to granting any new access.

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