

Interconnection Working Group Compliance Guidelines

I. General

It is the policy and practice of PSEG Long Island, the Long Island Power Authority's agent and Service Provider, to obey all laws, including the antitrust laws, and to avoid all conduct that unreasonably restrains competition. This policy requires the avoidance of any conduct that violates, or that might appear to violate any such laws. Among other things, the antitrust laws forbid any agreement between or among competitors regarding prices, availability of service, product design, terms of sale, division of markets, allocation of customers or any other activity that unreasonably restrains competition.

It is the responsibility of every participant of the Interconnection Working Group (IWG) to comply with all laws in a manner consistent with this policy.

The principal purpose of these guidelines is to alert IWG participants to potential antitrust problems and to set forth policies to be followed with respect to activities that may involve antitrust considerations.

All persons attending an IWG meeting shall act in accordance with these guidelines at all times. A copy of these guidelines will be included with each meeting agenda and each attendee will be required to execute an acknowledgement indicating that they have read these guidelines, understand what they require and agree to abide by the requirements therein. Any IWG participant who is uncertain about the legal ramifications of a particular course of conduct or who has doubts or concerns about whether this compliance policy is implicated in any situation should consult their respective legal counsel and PSEG LI's IWG Lead.

II. Procedures for IWG Meetings:

1. An agenda shall be posted on PSEG LI's website in advance of every meeting. The agenda shall be specific, include all topics to be discussed and be reviewed by PSEG LI legal counsel before distribution.
2. At the start of every meeting the person chairing it shall read the following statement:

"This meeting is for the specific purpose described in the agenda and not for the purpose of reaching any agreement that affects the competitive business activities of companies represented.

- a. IWG meetings are conducted in accordance with the Interconnection Working Group Compliance Guidelines and each attendee is to receive a copy of these guidelines and execute an acknowledgement prior to the commencement of the meeting.
- b. Participation in IWG meetings is completely voluntary and is open to all interested participants.
- c. Any questions or concerns about antitrust or any other legal or regulatory matters should be directed to the PSEG LI chairperson who will then consult legal counsel.

There shall be no discussion of the 'Topics to Avoid at IWG Meetings' set forth below. If a participant mentions one of these topics, the person chairing the meeting shall halt the discussion. If the discussion continues, the meeting shall be terminated."

3. A PSEG Long Island attorney shall attend each meeting.

4. Minutes of all meetings shall be prepared and maintained by PSEG Long Island. The minutes shall be reviewed in draft form by PSEG Long Island counsel and then distributed to meetings participants as the official record of the meeting.

III. Topics To Avoid at IWG Meetings

Participants in IWG meetings (including those of its committees and subgroups) must refrain from the following when acting in their capacity as participants in such meetings:

- a. Discussions involving pricing information, especially margin (profit) and internal cost information and participants' expectations as to their future prices or internal costs.
- b. Discussions of a participant's marketing strategies.
- c. Discussions regarding how customers and geographical areas are to be divided among competitors.
- d. Discussions concerning the exclusion of competitors from markets.
- e. Discussions concerning boycotting or group refusals to deal with competitors, vendors or suppliers.
- f. •Proprietary information shall not be disclosed by any participant during any stakeholder engagement meeting or its subgroups. In addition, no information of a secret or proprietary nature shall be made available to other IWG participants.
- g. Industry-related topics considered sensitive or market intelligence in nature that are outside of their committee's scope or assignment, or the published agenda for the meeting.
- h. Their company's prices for products or services, or prices charged by their competitors.
- i. Any competitively sensitive information concerning their company or a competitor.
- j. "Best Practices" discussions at meetings shall be limited to those designed to promote and protect safety, health, environment, reliability or other public interest goals; reduce transaction costs, achieve economies scale or realize some other efficiency. Discussions shall be confined to what is reasonably necessary to accomplish such goals and in no event shall include any "Topic to Avoid at IWG Meetings" as set forth above. If a "best practices" discussion identifies a new approach that might benefit IWG participants (and competitors), customers or suppliers by serving the goals identified in the preceding sentence, they shall be published by PSEG Long Island for comments by IWG participants (and competitors), customers, suppliers and other members of the public before final action by PSEG Long Island.

Any other matters that do not clearly fall within these guidelines should be reviewed with PSEG Long Island's VP Legal Services before being discussed.

IV. Activities That Are Permitted

Decisions and actions by IWG meeting participants should only be undertaken for the purpose of promoting and maintaining the safety and reliability and adequacy of LIPA's power system. If you do not have a legitimate purpose consistent with this objective for discussing a matter, please refrain from discussing the matter during IWG meetings and in other IWG activities.

In addition, all discussions in IWG meetings must be within the scope of the published agenda for the meeting.

No decisions should be made nor any actions taken at the IWG meetings for the purpose of giving an industry participant or group of participants a competitive advantage over other participants. In particular, decisions with respect to setting, revising, or assessing compliance with interconnection or reliability requirements or standards must not be influenced by anti-competitive motivations.

June 24, 2019

Acknowledgement of Receipt and Review

I acknowledge that I have read and understand the Interconnection Working Group Compliance Guidelines and I will comply fully with it.

Signature

Printed Name

Entity Name

Date
