1. Purpose

Pattern Energy Group, LP ("PEG") and its affiliates are committed to compliance with all applicable regulations and the policies of the Federal Energy Regulatory Commission ("FERC" or the "Commission"), including those intended to preserve open and non-discriminatory transmission access. Public utilities that own, operate, or control facilities used for the transmission of electric energy in interstate commerce ("Transmission Providers") are subject to certain Standards of Conduct for Transmission Providers established by FERC ("Standards of Conduct") if they conduct transmission transactions with an affiliate that engages in marketing functions. To ensure compliance with FERC's Standards of Conduct, the PEG Transmission Providers have adopted the implementing procedures provided herein (the "Procedure"). The PEG Transmission Providers include:

- SunZia Transmission, LLC ("SZT"); and
- Western Interconnect LLC ("WI").

2. Applicability

This Procedure applies to all PEG Representatives (defined below in Section 3), and shall be applied consistently with the requirements of 18 C.F.R. Part 358 and FERC Order Nos. 717, 717-A, 717-B, 717-C, and 717-D, as they may be modified from time to time.

While FERC's Standards of Conduct apply to Transmission Providers, like SZT and WI, WI has obtained from FERC a waiver of its Standards of Conduct requirements. WI shall remain in compliance with all condition or requirements provided in such waiver. If for any reason WI's FERC waiver is terminated or canceled, this Procedure shall immediately apply to WI.

3. Definitions

- CAISO:
  The California Independent System Operator Corporation or any successor entity performing similar functions.

- CCO:
  The Chief Compliance Officer.

- FERC or Commission:
  The Federal Energy Regulatory Commission or any successor government agency.

- Gridforce:
  Gridforce Energy Management, LLC.

- Marketing Function:

Document Classification: PUBLIC

In the case of public utilities and their affiliates, the sale for resale in interstate commerce, or the submission of offers to sell in interstate commerce, of electric energy or capacity, demand response, virtual transactions, or financial or physical transmission rights, all as subject to an exclusion for bundled retail sales, including sales of electric energy made by providers of last resort (POLRs) acting in their POLR capacity.

- Marketing Function Employee or MFE:
  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. Within PEG, MFEs include employees under the following business units or departments: Energy Management and Origination.

- NERC:
  North American Electric Reliability Corporation.

- OATT:
  Open Access Transmission Tariff.

- PEG:
  Pattern Energy Group LP and its subsidiaries.

- PEG Assets:
  Any asset owned, operated, rented or leased by PEG that includes, but is not limited to, generation assets, transmission assets, control rooms, control centers, data centers.

- PEG Representatives:
  For purposes of this Procedure, PEG Representatives will refer to PEG officers, directors, employees, contractors, vendors, consultants and agents.

- Procedure:
  The written procedures provided herein, which establish PEG's compliance with FERC's Standards of Conduct.

- SPTO:
  Subscriber Participating Transmission Owner.

- Standards of Conduct:
  The regulations adopted by FERC in 18 C.F.R. Par 358, which include standards of conduct applicable to Transmission Providers.

- Transmission:
  Electric transmission, network or point-to-point service, ancillary services or other methods of electric transmission, or the interconnection with jurisdictional transmission facilities.

- Transmission Customer:
  Any eligible customer or designated agent that can or does execute a transmission service agreement or can or does receive transmission service, including all persons who have pending requests for transmission service or for information regarding transmission.

- Transmission Function:
  The planning, directing, organizing or carrying out of day-to-day transmission operations, including the granting and denying of transmission service requests.

- Transmission Function Information:
  Information relating to transmission functions, which can include data or information regarding:

  - Transmission power flows
  - transmission loading relief
  - transmission outages or other system conditions
  - curtailments
  - balancing load with energy or capacity
  - available transmission capability
  - price of transmission
  - transmission services provided to specific Transmission Customers
  - the granting or denying of transmission service or interconnection requests
  - day-to-day transmission system operations
  - sales of ancillary services under to transmission customers
  - potential or planned transmission development or system capital projects like network upgrades.

- Transmission Function Employee (TFE):
  An employee, contractor, consultant or agent of a Transmission Provider who actively and personally engages on a day-to-day basis in Transmission Functions. A TFE does not include an employee that engages in long-range transmission planning but could include an employee that conducts system impact studies. Within PEG, TFEs include employees under the following business units or departments: Operational Excellence (Transmission Operations), Field Operations (HVDC & Transmission), and the PEG Operations Control Center. A full list of PEG TFEs can be found in Appendix 1 attached hereto.

- Transmission Provider:
  Any public utility that owns, operates or controls facilities used for the transmission of electric energy in interstate commerce.

4. Chief Compliance Officer

The Chief Compliance Officer ("CCO") designated for purposes of FERC's Standards of Conduct is the PEG CCO:

Andrew Murray
1088 Sansome Street
San Francisco, CA 94111
Email: andrew.murray@patternenergy.com
Phone: 415-283-4032

The CCO is accountable for maintaining compliance with FERC's Standards of Conduct and this Procedure. Any questions regarding this Procedure may be directed to the CCO, the Regulatory Compliance department at regulatory@patternenergy.com, or PEG's Ethics Hotline (as described below in Section 7).

5. Procedure Review and Continuous Improvement

This Procedure shall be reviewed, maintained, and modified, as appropriate, by the Regulatory Compliance department and approved by the CCO on an annual basis or as necessary due to changes in laws or regulations, PEG policies, or PEG business operations. Additionally, the Regulatory Compliance department will be responsible for continuously reviewing and assessing whether this Procedure and controls provided herein are being met. PEG Representatives are required to cooperate with the Regulatory Compliance and/or Internal Audit department in any Standards of Conduct compliance review, assessment or audit.

6. Training

All PEG employees to which this Procedure applies shall receive within 30 days of their employment date and annually thereafter compliance training on the requirements of FERC's Standards of Conduct and this Procedure. The Regulatory Compliance department will administer such compliance training and may do so more frequently as needed, for instance, where a PEG employee changes roles or transfers to a Transmission or Marketing Function. The compliance training shall include a copy of or electronic link to this Procedure.

Training materials and related records, such as training logs or certifications, shall be retained for at least 5 years by the Regulatory Compliance department in accordance with FERC's record retention requirements.

7. Reporting

PEG Representatives can seek guidance or report potential or actual violations by contacting the CCO or Regulatory Compliance department. Concerns may also be reported using PEG's Ethics Hotline at the following phone numbers:

- USA, Canada & Puerto Rico: 1-833-626-1549
- Mexico: 1-800-681-1812
- Netherlands: 0800-022-8791.

An anonymous report should provide as much as possible information about the incident or potential or actual violation to allow PEG to investigate properly. PEG will promptly investigate any report of a potential or actual violation of this Procedure or FERC's Standards of Conduct. If concerns or complaints require confidentiality, including keeping an identity anonymous, PEG will endeavor to protect this confidentiality, subject to applicable law, regulation or legal proceedings. PEG Representatives are required to cooperate in any internal investigation of misconduct.

PEG will not tolerate any kind of retaliation for reports or complaints regarding misconduct that were made in good faith. Any PEG Representative who engage in retaliation against a PEG Representative for reporting or participating in an investigation may be subject to discipline, including termination.

Violations of this Procedure may result in disciplinary action up to and including termination of access to PEG Assets, termination of employment and termination of contract.

8. General Principals of the Standards of Conduct

The PEG Transmission Providers adopt as corporate policy the four general principles of FERC's Standards of Conduct:

1. **Non-Discrimination Requirement (18 C.F.R. § 358.4)** – Transmission Providers will treat all transmission customers, affiliated and non-affiliated, on a not unduly discriminatory basis and will not grant any undue preference or advantage to any person or subject any person to any undue prejudice or disadvantage with respect to any transmission or sale of electric energy in interstate commerce.

2. **Independent Functioning Rule (18 C.F.R. § 358.5)** – TFEs of a Transmission Provider will function independently from its MFEs.

3. **No-Conduit Rule (18 C.F.R. § 358.6)** – Transmission Providers are prohibited from disclosing, or using a conduit to disclose, non-public Transmission Function Information to any MFE.

4. **Transparency Rule (18 C.F.R. § 358.7)** – Transmission Providers will provide to all of its Transmission Customers, affiliated and non-affiliated, equal access to non-public Transmission Function Information, except in the case of non-public transmission customer information, critical energy infrastructure information, or any other information determined by the Commission to be subject to limited dissemination.

8.1. Non-Discrimination Requirements

SZT is or will become a Subscriber Participating Transmission Owner ("SPTO") of the CAISO and, as a result, transfer operational control of the SZT transmission system to CAISO. As an SPTO, SZT will have access to certain Transmission Function Information but will not control access to its transmission system or access to transmission service. Rather, the CAISO will be responsible for providing open access to the SZT transmission system in a non-discriminatory manner pursuant to CAISO FERC-approved Open Access Transmission Tariff ("OATT").

8.2. Independent Functioning Rule

Given SZT will grant to CAISO operational control of its transmission system and has contracted Gridforce Energy Management, LLC ("Gridforce") to register as SZT's North American Electric Reliability Corporation ("NERC") Transmission Operator (TOP), most of SZT's Transmission Functions are or will be provided by third-party Transmission Providers that operate independently of PEG's MFEs. In addition, PEG MFEs are prohibited from conducting PEG's Transmission Functions, and PEG TFEs are prohibited from conducting PEG's Marketing Functions. Access to the Gridforce or SZT system control centers and transmission facilities may be granted to PEG MFEs so long as such access does not differ in any way from the access available to other Transmission Customers.

8.2.1. Physical Separation

PEG Representatives, including PEG MFEs, do not share the same office space with the third-party Transmission Providers responsible for operating the SZT assets and have restricted access, if any, to the third-party Transmission Providers' facilities and offices. Further, PEG's MFEs & TFEs have been physically separated within PEG offices and do not have physical access to each other's locations within PEG's offices.

8.2.2. Digital Separation

PEG MFEs have no digital or electronic access to SZT's third-party Transmission Providers' electronic systems and have been blocked from accessing non-public Transmission Function Information that are stored electronically on PEG Assets through firewalls, authorizations, login credentials or other means established by PEG's IT department.

8.2.3 Employee Designations and Transfers

In coordination with impacted PEG departments, the Regulatory Compliance department will determine and continually assess the designations of PEG TFEs and MFEs. The Regulatory Compliance department must be noticed if any transfer of a TFE or MFE to another position or role within PEG, including to a TFE or MFE position, is planned. Transfers of roles between TFEs and MFEs are permitted so long as the transfer is not used as a means to circumvent FERC's Standards of Conduct. The

Regulatory Compliance department will determine any appropriate cooling-off period or other mitigation to ensure FERC's Standards of Conduct are met.

8.2.4 Books and Records

PEG Transmission Providers separately maintain their books of account and records from those of its affiliates that employ or retain MFEs, which can be made available for FERC inspection.

8.3. No Conduit Rule

To prevent the disclosure of non-public transmission information to MFEs, PEG will implement and maintain the following controls.

- Non-public Transmission Function Information will be physically stored in areas of PEG offices that are separate and restricted from MFEs.
- PEG TFEs and MFEs will not share printers or copiers or any other office equipment that might inadvertently allow disclosure of non-public Transmission Function Information to MFEs.
- Non-public Transmission Function Information electronically stored shall be identified and will be restricted from MFEs (employees seeking to access PEG networks, drives, or systems that contain such information will be screened and authorized by the IT department in collaboration with the Regulatory Compliance department).
- Emails and communications containing non-public Transmission Function Information shall be marked in the Subject Line and/or in the header of the communication with the following: "Contains Non-public Transmission Function Information. Do Not Distribute to Marketing Function Employees."
- Any in-person meeting between TFEs and MFEs shall be conducted outside of TFE office space.
- TFEs and PEG Representatives, such as Legal, Compliance, Settlements and other shared support services, shall avoid communications around the PEG offices of MFEs and common areas, such as break rooms or the kitchen.
- TFEs and PEG Representatives shall avoid discussions regarding non-public Transmission Function Information where PEG MFEs are present, such as Company meetings (virtual or in-person), parties, events or other gatherings. Where appropriate, such as team meetings where both TFE and MFEs are present, an agenda shall be established prior to such meeting that does not involve discussion of non-public Transmission Function Information, and a reminder of the No Conduit Rule shall be given at the beginning of the meeting.

- Third-Party Transmission Providers or other potential third-party conduits will represent or certify in their service agreements or other appropriate documents that they will abide by PEG's Standards of Conduct program in compliance with this Procedure, including preventing the disclosure of non-public PEG Transmission Function Information to PEG MFEs.

Notwithstanding the No Conduit Rule, PEG TFEs and MFEs may exchange non-public Transmission Function Information if it pertains to (i) a Transmission Customer's information where such customer has consented in writing to such disclosure, (ii) an MFE's specific request for transmission or interconnection service to the SZT system pursuant to the CAISO OATT, or (iii) compliance with NERC reliability standards approved by FERC and information necessary to maintain or restore operation of the PEG Transmission Providers' transmission systems. In such cases, PEG will require its TFEs to create and retain a contemporaneous record of the exchange, except the record may be created as soon as practicable after the fact in the case of emergency situations. Such records must be provided to the Regulatory Compliance department.

PEG Representatives shall consult the Regulatory Compliance department to determine whether any disclosures of non-public Transmission Function Information to PEG MFEs may be permissible, such as through a waiver or consent.

8.4. Transparency Rule

PEG Transmission Providers will provide all of their Transmission Customers, whether affiliated or non-affiliated, equal access to Transmission Function Information. Upon discovery that non-public Transmission Function Information may have been disclosed to a PEG MFE, all PEG Representative aware of such potential disclosure must immediately report it to the CCO, Regulatory Compliance department, or PEG Ethics Hotline. If the CCO or Regulatory Compliance department finds a prohibited disclosure has occurred, the Regulatory Compliance department shall post such information (along with details such as the date of the improper disclosure and to whom the disclosure was made) on the PEG Transmission Providers' web page unless the information constitutes critical energy infrastructure information or is otherwise subject to limited disclosure by other applicable laws in which case only the fact that an improper disclosure was made must be published.

Additionally, in accordance with FERC's Standards of Conduct Transparency Rule, the Regulatory Compliance department in collaboration with appropriate PEG Representatives shall ensure the following information is published to the PEG Transmission Providers' web page (https://patternenergy.com/sunzia-ferc-standards-of-conduct/) and updated within 7 days of any change to such information:

1. this Procedure
2. PEG CCO and contact information
3. job titles and job descriptions of PEG TFEs

4. any transfer of an employee between TFE and MFE roles, including the date of such transfer, the name of the employee, and respective titles held and to be held by such employee (such transfer must be published for at least 90 days)

5. names and addresses of all PEG Transmission Providers' affiliates that employ or retain MFEs, which is also provided in Appendix 2 attached hereto

6. facilities shared by the PEG TFEs and MFEs, including the types of facilities shared and their addresses

7. within 7 days after public announcement, potential mergers partners if they employ or retain MFEs

8. notice of a Transmission Customer's written consent to the disclosure of such customer's non-public information to a PEG MFE along with a statement that the PEG Transmission Provider did not provide any preferences, either operational or rate-related, in exchange for the customer's voluntary consent

9. waivers of any tariff provisions unless the waiver is approved by FERC (since SZT will grant to CAISO operational control of its transmission system, SZT generally will not be in a position to grant any such waivers).

PEG Representatives are required to communicate to the Regulatory Compliance department any changes to the information described above so that such changes may be published timely in accordance with FERC's requirements.

9. Record Retention

PEG Transmission Providers will retain all documents and information associated with the implementation of this Procedure for a period of 5 years in accordance with FERC's regulations and as further outlined herein.

10. Referenced Documents and Procedures

- PEG Standards of Conduct Webpage and Procedure: https://patternenergy.com/sunzia-ferc-standards-of-conduct/

- Code of Federal Regulations: https://www.ecfr.gov/current/title-18/chapter-I/subchapter-S/part-358

- FERC Orders Related to the Standards of Conduct for Transmission Providers: https://www.ferc.gov/enforcement-legal/legal/major-orders-regulations/standards-conduct-transmission-providers.

11. Version History

11.1. Revision Registry

Version	Effective Date	Reviewer	Description
1	09-17-25	Meghan Gruebner	Original Development

11.2. Approval

Name	Title	Date
Andrew Murray	Chief Compliance Officer	09-17-25

Appendix 1

List of Transmission Function Employees

Job Title	Job Description
Facility Manager HVDC & Transmission	Responsible for providing safe and reliable management of transmission system activities including onsite switching activities, maintenance, corrective actions, and performance on a daily basis.
Assistant Facility Manager, Sunzia Transmission	Responsible for supporting the Facility Manager HVDC & Transmission in for providing safe and reliable management of transmission system activities including onsite switching activities, maintenance, corrective actions and performance on a daily basis.
Director, Field Operations	Responsible for providing regional oversight for providing safe and reliable management of transmission system activities including onsite switching activities, maintenance, corrective actions, and performance. In addition, responsible for providing regional oversite for the safe and reliable management of generation assets within their footprint.
Director, Operations Control Center (OCC)	Responsible for providing strategic oversight and leadership to the real-time, 24/7 Operations Control Center (OCC), including processes, procedures and training. The OCC is responsible for coordinating transmission system activities with the Transmission Operator to ensure safety and reliability of the Bulk Electrical System. Additionally, responsible for safe and reliable operation of generation assets, on a 24/7 basis, including real-time coordination of generation asset operations with the applicable Reliability Coordinator, Transmission Operator and Balancing Authority.
Control Center Operator (All levels)	Responsible for providing 24/7 real-time monitoring, support and coordination of transmission system activities with the Transmission Operator to ensure safety and reliability of the Bulk Electrical System. Additionally, responsible for safe and reliable operation of generation assets, on a 24/7 basis, including real-time coordination of generation asset operations with the applicable Reliability Coordinator, Transmission Operator and Balancing Authority.
Director, Transmission Operations	Responsible for developing and implementing long-term strategic plans for transmission system activities including maintenance, corrective actions, performance, cost modeling and vendor selection as required.
Senior Manager, Transmission and BOP	Responsible for supporting safe and reliable management of onsite transmission system activities including onsite switching activities, maintenance, corrective actions and performance.
Lead HVDC Engineer	Responsible for supporting safe and reliable management of onsite transmission system activities, from an engineering perspective, including onsite switching activities, maintenance, corrective actions and performance.
BOP Technician - Transmission	Responsible for supporting the Facility Manager HVDC & Transmission and Assistant Facility Manager, Transmission in for providing safe and reliable management of transmission system activities including onsite switching activities, maintenance, corrective actions and performance on a daily basis.

Document Classification: PUBLIC

Appendix 2

Affiliate List with Marketing Function Employees (MFE)

See below an Affiliate List with Marketing Function Employees directly owned PEG:

PEG Affiliate	Business Address
Broadview Energy JN, LLC	1088 Sansome Street, San Francisco, California 94111, United States
Broadview Energy KW, LLC	1088 Sansome Street, San Francisco, California 94111, United States
Clines Corners Wind Farm LLC	1088 Sansome Street, San Francisco, California 94111, United States
Duran Mesa LLC	1088 Sansome Street, San Francisco, California 94111, United States
Fowler Ridge IV Wind Farm LLC	1088 Sansome Street, San Francisco, California 94111, United States
Grady Wind Energy Center, LLC	1088 Sansome Street, San Francisco, California 94111, United States
Hatchet Ridge Wind, LLC	1088 Sansome Street, San Francisco, California 94111, United States
Lost Creek Wind, LLC	1088 Sansome Street, San Francisco, California 94111, United States
Ocotillo Express LLC	1088 Sansome Street, San Francisco, California 94111, United States
Post Rock Wind Power Project, LLC	1088 Sansome Street, San Francisco, California 94111, United States
Red Cloud Wind LLC	1088 Sansome Street, San Francisco, California 94111, United States
Spring Valley Wind LLC	1088 Sansome Street, San Francisco, California 94111, United States
Stillwater Wind, LLC	1088 Sansome Street, San Francisco, California 94111, United States
Tecolote Wind LLC	1088 Sansome Street, San Francisco, California 94111, United States
Pattern Energy Management Services LLC	1088 Sansome Street, San Francisco, California 94111, United States
SunZia Wind North LLC	1088 Sansome Street, San Francisco, California 94111, United States
SunZia Wind South LLC	1088 Sansome Street, San Francisco, California 94111, United States

Canada Pension Plan Investment Board, Stichting Pensioen fonds ABP and Australian Retirement Trust Pty Ltd are upstream owners of PEG. A full list of their subsidiaries with MFEs to which PEG Transmission Providers are affiliated can be found in the Commission's MBR Portal (https://mbrweb.ferc.gov/).