

> Standards of Conduct

Shared Facilities

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

Building and Building Services – Pursuant to §358.7(e)(2) of the Commission’s Regulations, the following is a complete list of the employee-staffed facilities (excluding facilities where individuals do not typically transact business) shared by any Transmission Function Employees (TFEs) for Transco and Marketing Function Employees.

The following employee-staffed facilities are shared by certain Transmission Function Employees for Transco and Marketing Function Employees:

One Williams Center

Tulsa, Oklahoma

The Marketing Function Employees reside in an office space that is separated from the locations of the Transmission Function Employees for Transco.

Transco’s main office facility is located in Houston, Texas. No Marketing Function Employees share this facility. A card key is required to access the office space that Transco’s TFEs occupy in its main facilities in Houston. The card key access system prohibits access by a Marketing Function Employee to Transco’s Houston facilities. Marketing Function Employees, as with non-affiliated visitors, may enter Transco’s office space after registering with a receptionist and providing identification, but no card key is provided and they must be escorted by Transco personnel.

Computer Systems - Transco TFEs and Marketing Function Employees share a Wide Area Network, and share access to servers on which corporate support-related systems reside, such as the human resources system, and the financial enterprise resource planning system (which supports finance, accounting, planning and forecasting, and reporting functions). Access to any Transmission Function Information (including non-affiliated shipper information) on those shared resources is restricted by organizational roles and the use of access control mechanisms (such as user ids, passwords) to ensure that Marketing Function Employees do not have access to that information. The remaining servers where Transmission Function Information is maintained are not shared with Marketing Function Employees. Access to those 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). Marketing Function Employees have access to transmission-related information through non-affiliated shippers.

Transco follows the Williams Access Control process under which Transco 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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