



**Guide for the Application of the
Transmission Standards of Conduct**

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Guide for the Application of the *Transmission Standards of Conduct*

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1 GLOSSARY

In this *Guide for the Application of the Transmission Standards of Conduct* (the “Standards”), the following terms mean:

“Act”: The *Act respecting the Régie de l’énergie* (CQLR, c. R-6.01).

“Affiliate of the Transmission Provider”: other units of Hydro-Québec, including the administrative units carrying out the corporate activities of the company, persons working within the Transmission Provider whose activities are not regulated under the Act, the company’s first-tier subsidiaries, second-tier subsidiaries, limited partnerships and joint ventures under the effective control of the company.

“Critical energy infrastructure”:¹ a system or asset in the transmission system, whether physical or virtual, whose unavailability or destruction could have a negative impact on national security, economic security, health or public safety.

“Employee”:¹ any employee, regardless of status, whether or not they are a manager, including officers, contractors and consultants. Also, there is no distinction between a part-time or full-time, temporary or permanent employee.

“Interconnection”:¹ facility used for the transmission of electricity from Québec to outside the province or from outside the province into Québec (e.g., Québec—New-York and Québec—Ontario lines).

“Marketing function employee”: an employee or any agent¹ of a Transmission Provider who actively and personally engages on a day-to-day basis in marketing functions.

“Marketing function”: the sale for resale or purchase for resale of electric energy, with the exception of supply contracts put in place by Hydro-Québec in its electricity distribution activities to meet Québec needs.

“Non-public transmission function information”:¹ information at the transmission system level related to the transfer capability at interconnections, which can provide a competitive advantage to a marketing function employee.

“OASIS”: Open Access Same-Time Information System, an Internet website that is used to request, approve and administer a transmission service and to disseminate information about the transmission system.

“Personnel”: the personnel under the authority of the Reliability Coordinator or another of the Transmission Provider’s units performing tasks related to the role of the Reliability Coordinator. Also included are personnel performing the functions of Balancing Authority and Transmission Operator. This definition includes both senior managers and employees as well as personnel

¹ In the current context, the concept of agent is not applicable.



employed on a contractual basis by the Reliability Coordinator or by another of the Transmission Provider's units to perform tasks related to the role of the Reliability Coordinator.

“Preferential treatment”: treatment granting an advantage to a transmission system user to the detriment of another in breach of the *Transmission Standards of Conduct*.

“Régie”: the Régie de l'énergie du Québec.

“Register of communications”:¹ a log recording permitted disclosures of non-public transmission function information to a marketing function employee.

“Reliability Coordinator”: the Reliability Coordinator designated by the Régie de l'énergie, under the conditions it determines, as the Reliability Coordinator in Québec.

“SCC”:² the system control centre.

“Similar facilities”:¹ similar facilities are defined as, but not limited to, the backup centre of the system control centre, as well as the telecontrol centres.

“Subsidiary”: a subsidiary as defined in the *Companies Act* (CQLR, c. C-38).

“System user”: any user of the electric power transmission system under the responsibility of the Reliability Coordinator, namely a producer, a transmission provider, a distributor, a customer directly connected to the electric power transmission system or a person who uses an electric power transmission system under an electric power transmission service agreement entered into with the Transmission Provider or with any other transmission provider in Québec.

“Tariff”: the current text of *Hydro-Québec Open Access Transmission Tariff*.

“TC”:¹ the telecontrol centres.

“Transmission customer”: any eligible customer (or its designated agent) that can or does execute a transmission service agreement, or that can or does receive transmission service, including all persons who have pending requests for transmission service.

“Transmission function employee”: an employee or agent³ of the Transmission Provider who actively and personally engages on a day-to-day basis in transmission functions.

“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 Provider”: Hydro-Québec when carrying on electric power transmission activities within the meaning of the *Act respecting the Régie de l'énergie* (RLRQ, c. R-6.01.).

² These definitions are provided for the purpose of clarifying the terms used in the *Guide for the Application of the Transmission Standards of Conduct* and are not part of the definitions included in the official version of the *Transmission Standards of Conduct*.

³ *Ibid.*



“Transmission service”: the provision of any transmission service in accordance with the *Hydro-Québec Open Access Transmission Tariff*.

“Website”: an Internet location where the company posts, by electronic means, the information required under the *Transmission Standards of Conduct* and includes the OASIS website.

2 PURPOSE

This document is a guide for Hydro-Québec employees to facilitate understanding of the requirements set out in the *Transmission Standards of Conduct*.

3 FUNCTIONS COVERED

The Standards apply to all Hydro-Québec employees. More specifically, they are aimed at the following:

Transmission
function
employees

Marketing function
employees

Reliability
Coordinator
Personnel

3.1 Transmission function employees

An employee who actively and personally engages on a day-to-day basis in the planning, directing, organizing or carrying out of transmission operations.

These employees work, for example, in the SCC and the TCs used for operating the transmission system at interconnections or for system planning (at interconnections). They may also perform other functions for the company, such as the examples listed in the following table.

Examples of transmission function activities	Examples of activities not considered transmission functions
<ul style="list-style-type: none"> • Real-time system operation; • Removal requests that affect transfer capability at interconnections; • Operating strategies; • Marketing of electric power Transmission Services; • IT support in the SCC, on a 24/7 basis; • Maintaining system reliability; • Carrying out impact studies on the system for transmission requests at interconnections; • Establishing the reliability standards of Interconnexion Québec with the Régie. 	<ul style="list-style-type: none"> • Field, maintenance and construction workers; • Mobile operators performing work on the facilities; • Long-term planning for the transmission system; • Transmission regulatory affairs; • Strategic corporate planning.

The list of job titles and job descriptions for transmission function employees is available on the website at the following link: [Ethics | Hydro-Québec \(hydroquebec.com\)](#)

More information is available on the Intranet site of Conformité d'entreprise unit (CEU), at the following address: [Transmission and Distribution Codes and Standards of Conduct | Corporate Compliance](#)

3.2 Marketing function employees

An employee who actively and personally engages on a day-to-day basis in the sale and purchase of electric energy in wholesale markets using interconnections.

Only employees of the Direction Principale – Parquet de transactions are considered marketing function employees.

Individuals not considered marketing function employees are those who occupy the following functions (non-limiting examples):

- **Employee responsible for procurement to meet Québec needs.**
- **Generator Operator.**



3.3 Personnel

Personnel under the authority of the Reliability Coordinator reporting to the Direction Principale – Contrôle des mouvements d'énergie et exploitation des réseaux, whether performing tasks related to the role of the Reliability Coordinator or not, and any employee from Hydro-Québec's other business units performing tasks related to the role of the Reliability Coordinator.

Personnel refers mainly to the personnel under the authority of the Reliability Coordinator (reporting to the Direction Principale – Contrôle des mouvements d'énergie et exploitation des réseaux) as well as to personnel from other business units performing tasks related to the Reliability Coordinator's role. The term also refers to certain employees working in information technology and telecommunications (VPTN) and those implementing the MSCR system (grid control system upgrade).

More information is available on the Intranet site of– Conformité d'entreprise unit (CEU), at the following address: [Transmission and Distribution Codes and Standards of Conduct | Corporate Compliance](#)

4 GENERAL PRINCIPLES

The requirements set out in the standards are based on four principles:

Non-discrimination

The Transmission Provider must treat all its transmission customers in a fair, impartial manner.

Independance

Transmission function employees must operate independently from marketing function employees.

No-conduit*

Any non-public transmission function information cannot be disclosed to marketing function employees.

Transparency*

All transmission customers must have equal access to information.

* See the exceptions to these two rules in the following sections.

4.1 NON-DISCRIMINATION RULE

Employees who receive, analyze and process transmission service requests must ensure compliance with the *Open Access Transmission Tariff*.

The use of OASIS and the WebTag system help ensure non-discrimination.

The Reliability Coordinator's Personnel must also treat all system users in a fair and non-discriminatory manner.

4.2 INDEPENDENT FUNCTIONING RULE

Sections in the Standards:

General rule

4.1 Subject to the other provisions of these Standards of Conduct otherwise permitted by the Régie, Transmission function employees must function independently of Marketing function employees.

Separation of functions

4.2 The Transmission Provider is prohibited from permitting Marketing function employees to:

- i. Conduct transmission functions; or
- ii. Have access the system control centre or similar facilities used for transmission operations that differs in any way from the access available to other Transmission customers.

4.3 The Transmission Provider is prohibited from permitting its Transmission function employees to conduct Marketing functions.

A transmission function employee is prohibited from:

- Authorizing a marketing function employee to access the SCC or similar facilities (telecontrol centres and backup centre to the system control centre) in a manner that differs from the access available to other transmission customers.

Other than Personnel, system users are prohibited from:

- Participating directly in the operations of the Reliability Coordinator;
- Accessing the SCC or similar facilities used for transmission operations or reliability functions, in a manner that differs in any way from the access available to other system users.



4.3 NO-CONDUIT RULE

Sections in the Standards:

5.1 The Transmission Provider is prohibited from using anyone as a conduit for the disclosure of non-public Transmission function information to Marketing function employees.

5.2 An employee, contractor, consultant or agent of the Transmission Provider or of one of its Affiliates that is engaged in Marketing functions is prohibited from disclosing non-public Transmission function information to Marketing function employees.

7.8 Personnel shall not disclose information granting Preferential Treatment to an employee of a System User, an employee of another of the Transmission Provider's units or an employee of an Affiliate of the Transmission Provider.

The no-conduit rule prohibits the disclosure of any non-public transmission function information to marketing function employees.

Non-public transmission function information can be communicated internally based on the employee's functions, only if it is required for the employee to complete their tasks. For example, employees may need such information for transmission system planning or strategic corporate planning.

In such cases, the teams that received this information cannot then communicate it to marketing function employees.

The no-conduit rule also prohibits the disclosure of information related to a transmission customer or system user to a third party, even if the third party is not a marketing function employee.

What is considered non-public transmission function information?

Any information related to an interconnection that has not yet been made public in the OASIS information system. This type of information could provide a competitive advantage to a marketing function employee.

For example:

- Maintenance of the transmission system that affects transfer capability at interconnections (e.g., planned equipment outage and repair);
- The status of the transmission system in relation to transfer capability at interconnections;
- Operation of the transmission system in relation to transfer capability at interconnections (e.g., capacity limit);
- Short-term planning, operation, and direction of the transmission system affecting transfer capability at interconnections;
- The components of impact studies considered confidential (e.g., one-line connection diagrams, critical energy infrastructure information, detailed estimates of the costs of different solutions).



Other types of information that cannot be disclosed

In addition to non-public transmission function information, the no-conduit rule also prohibits the disclosure of the following types of information to marketing function employees:

- Information related to a transmission customer (planned transactions, commercial information obtained from a customer, etc.) or system user
- Critical energy infrastructure information
- Information granting preferential treatment that is not posted on the Reliability Coordinator's website

Information that can be shared

Some information can be shared with marketing function employees:

- Information needed to restore or maintain the system in the event of an emergency affecting the reliability of Hydro-Québec's transmission system.
- Information already available on OASIS. For example, information on real-time or planned outages.
- Energy schedules to or from neighbouring systems.
- Transmission schedule curtailments specific to the trading floor.
- Information needed to restore or maintain the supply/demand balance in Québec.
- Information needed to operate generating stations that can be routed to neighbouring systems.
- Information related to a specific transmission service request submitted by the marketing function employee.
- Non-public information related to a transmission customer if a voluntary consent for disclosure has been provided.
- Any information pertaining to compliance with reliability standards approved by the Régie.
- Information necessary to restore or maintain operation of the transmission system or generating units, or that may affect the dispatch of generating units

4.4 TRANSPARENCY RULE

4.4.1 General rule – *Contemporaneous disclosure of information*

Sections in the Standards:

Contemporaneous disclosure

6.1 If the Transmission Provider discloses non-public Transmission function information, other than information identified in Section 6.3 (*discussion about a specific request for Transmission service*), in a manner contrary to the requirements of Chapter 5, the Transmission Provider must immediately post the information that was disclosed on the Company website.

6.2 If the Transmission Provider discloses, in a manner contrary to the requirements of Chapter 5, non-public Transmission customer information, critical energy infrastructure information (CEII) or any other information that the Régie has determined is to be subject to limited dissemination, the Transmission Provider must immediately post notice on the Company website that the information was disclosed.

The transparency rule requires that if non-public information is disclosed, the situation shall be reported on the company's website.

For example, let's assume that an SCC employee accidentally informed a marketing function employee about the timing of a return to service before this information was disseminated on OASIS and made available to all customers.

In this situation, the information must be published on OASIS as soon as possible so that it can be shared with all transmission customers and a notice must also be published.

In the event that the information disclosed is related to a transmission customer or a critical energy infrastructure:

- The Standards require that the situation be reported immediately online. The notice sent out through OASIS need simply state that information on a customer was disclosed to a marketing function employee and indicate the time that the disclosure took place.



If you think you may have disclosed information that you should not have, visit the Intranet site of the – Conformité d'entreprise unit at once to find out the steps you need to take: [Transmission and Distribution Codes and Standards of Conduct | Corporate Compliance](#). If you are at the SCC, consult the internal procedures.



4.4.2 Exceptions

Information exchanges permitted in the Standards

The following information exchanges are permitted under the Standards and do not require any posting:

- The disclosure of information on the internal transmission system that is not related to interconnections.
- Discussions with a marketing function employee about a transmission service request that the employee submitted.

Other types of information exchanges are also permitted, but subject to specific conditions:

Voluntary consent of a transmission customer

Section in the Standards:	
<p>6.4 A transmission customer may voluntarily consent, in writing, to allow the Transmission Provider to disclose the Transmission customer's non-public information to Marketing function employees. If the Transmission customer authorizes such disclosure, the Transmission Provider must post notice of that consent on the Company website, along with a statement that it did not provide any preferences, either operational or tariff-related, in exchange for that voluntary consent.</p>	<p>If the transmission customer authorizes the disclosure of their information, the Transmission Provider must post a notice of that consent on the website, along with a statement confirming that the Transmission Provider did not offer any preferences, either operational or tariff-related, in exchange for that voluntary consent.</p>

Information required to restore or maintain operation of the transmission system or generating units (sections 6.13 and 6.14), and recorded in the register of communications:

A transmission function employee can disclose to a marketing function employee:

- Information pertaining to compliance with reliability standards.
- Information necessary to maintain operation of the transmission system or generating units, or that may affect the dispatch of generating units.



4.5 Reliability Coordinator appointed by the Régie

Beyond the rules previously mentioned, Personnel must prioritize the reliability of the transmission system at all times. Personnel are authorized to take any steps they deem necessary to maintain the reliability of the transmission system in an emergency situation.

5 IMPLEMENTATION AND SPECIFICS

5.1 Emergency measures

In an emergency affecting transmission system reliability, Personnel and transmission function employees may take all measures necessary for the transmission system to continue operating.⁴ Any emergency that entails a departure from the Standards must be posted immediately on OASIS within 24 hours of such departure. The Reliability Coordinator must ensure that this gets posted.

5.2 Entity responsible for training and compliance

Hydro-Québec must provide annual training⁵ on the Standards to all employees under the scope of the Standards of conduct.⁶

The employees in question must certify that they have received that training.

The Vice President – Corporate, Legal, Regulatory Affairs and Chief Governance Officer is responsible for ensuring compliance with the Standards. He carries out his role as Chief Compliance Officer through Conformité d'entreprise unit (CEU).

5.3 Entity responsible for issuing interpretation notices on the Standards

Conformité d'entreprise unit (DCU) is responsible for issuing interpretation notices on the Standards.

5.4 Reporting of potential non-compliances

Any employee who is aware of or suspects a potential non-compliance with the Standards is required to report it immediately to CEU (>DCE Normes de conduite@hydroquebec.com).

Any employee who is aware of or suspects a potential non-compliance with the reliability standards approved by the Régie is required to report it immediately to the unit in charge of

⁴ Section 8.2 of the *Transmission Standards of Conduct* states: *Regardless of any conflicting provision in these Standards of Conduct, in the event of an emergency affecting the reliability of the transmission system, the Transmission Provider may take all necessary measures to ensure that the power system continues to operate. The Transmission Provider must post on OASIS any emergency that resulted in a departure from these Standards of Conduct within 24 hours of such departure.*

⁵ Applicable training can be training in the AgiliT application, a presentation during meetings, or a written communication.

⁶ Hydro-Québec is also required to provide training on the Standards to new employees in question within the first 30 days of their employment.



regulatory affairs for the Reliability Coordinator, at the following address: [Contact us – Reliability Coordinator | Hydro-Québec \(hydroquebec.com\)](#).

5.5 Posting of the Guide

The CEU is responsible for ensuring that this Guide is posted on the company's website and that it gets updated.

5.6 Questions and comments

Any questions, comments or requests for opinions pertaining to the Standards and this Guide should be sent to the CEU at: >DCE Normes de conduite@hydroquebec.com