



AUC

Alberta Utilities Commission

**AltaGas Ltd.
ECNG Energy LP**

Gas Code of Conduct Compliance Plans

April 27, 2011



The Alberta Utilities Commission

Decision 2011-174: AltaGas Ltd., ECNG Energy LP

Gas Code of Conduct Compliance Plans

Application Nos. 1607120 and 1607121

Proceeding ID No. 1127

April 27, 2011

Published by

The Alberta Utilities Commission

Fifth Avenue Place, Fourth Floor, 425 First Street S.W.

Calgary, Alberta

T2P 3L8

Telephone: 403-592-8845

Fax: 403-592-4406

Web site: www.auc.ab.ca

1 Introduction

1. The Alberta Utilities Commission (the AUC or the Commission) received two related applications (the applications) dated March 17, 2011, from AltaGas Ltd. (AltaGas) and ECNG Energy LP (ECNG). The applications seek approval for revisions made by AltaGas and ECNG to their respective compliance plans as required under Section 32 of the *Code of Conduct Regulation*, AR183/2003, made pursuant to the *Gas Utilities Act* (referred to as the *Gas Code of Conduct Regulation*).

2. The Commission decided to proceed without issuing notice as authorized under Section 9(1) of the *Alberta Utilities Commission Act*. The Commission considers that the record closed on March 18, 2011, the date on which it received the applications.

2 Background

3. On July 1, 2010, AltaGas Income Trust was converted to a corporation known as AltaGas Ltd. On January 1, 2011, AltaGas Energy Limited Partnership conveyed all of its assets and liabilities to its parent AltaGas Ltd., and was wound up as part of an internal reorganization.

4. ECNG is a partnership registered in Alberta and AltaGas is a corporation registered in Alberta. Both ECNG and AltaGas provide Retail Services to Alberta energy consumers. AltaGas and ECNG are affiliates of AltaGas Utilities Inc., a natural gas distribution company, and as a result, are subject to the *Gas Code of Conduct Regulation*. AltaGas and ECNG are applying for approval of changes to their respective compliance plans as a result of organizational changes. AltaGas Energy Limited Partnership submitted a plan reflecting its name change to AltaGas Ltd. The ECNG and the AltaGas plans also included changes to reflect references within the plans as a result of the internal reorganization.

3 Discussion

3.1 AltaGas compliance plan

5. The majority of the changes to the AltaGas Energy Limited Partnership compliance plan are related to the transfer of the assets of AltaGas Energy Limited Partnership to its parent AltaGas Ltd. References to AltaGas Energy Limited Partnership have been replaced with references to AltaGas Ltd.

6. An internal reorganization resulted in changes to the composition of the AltaGas Compliance Plan Committee. The Compliance Plan Committee is a committee of senior management personnel responsible for overseeing, implementing and monitoring the compliance plan. As a result of the reorganization, minor changes were made to the composition of the Committee.

3.2 ECNG compliance plan

7. There were minor changes to the ECNG compliance plan as a result of the conversion of AltaGas Income Trust into a corporation. The changes reflect the fact that ECNG is now an indirect wholly-owned subsidiary of AltaGas, and AltaGas has an indirectly held 100 per cent interest in AltaGas Utility Group Inc., the owner of AltaGas Utilities Inc. AltaGas Income Trust previously held an indirect 19.6 per cent interest in AltaGas Utility Group Inc., whereas the new corporation AltaGas Ltd. now holds an indirect 100 per cent interest.

8. As a result of the internal reorganization there were changes to the composition of the ECNG Compliance Plan Committee.

4 Order

9. It is hereby ordered that:

- (1) The Commission approves the revised compliance plans for AltaGas and ECNG which are set out in Appendices 1 and 2 and directs AltaGas and ECNG to post these plans on their websites by May 31, 2011.

Dated on April 27, 2011.

The Alberta Utilities Commission

(original signed by)

Kay Holgate
Commission Member

Appendix 1 – Revised compliance plan AltaGas

[\(return to text\)](#)



Appendix 1 - AltaGas
March 2011

(consists of 23 pages)

Appendix 2 – Revised compliance plan ECNG

[\(return to text\)](#)



Appendix 2 - ECNG
March 2011

(consists of 23 pages)

ALTAGAS LTD.
GAS CODE OF CONDUCT REGULATION
COMPLIANCE PLAN
March, 2011

TABLE OF CONTENTS

I. INTRODUCTION	1
(A) PURPOSE OF ALTAGAS LTD. COMPLIANCE PLAN	1
II. DEFINITIONS	2
III. CONDUCT OF ALTAGAS LTD.....	5
(A) BEHAVIOUR OF ALTAGAS (GCCR SECTION 3)	5
IV. EQUALITY OF TREATMENT FOR CUSTOMERS	6
(A) TYING PROHIBITED (GCCR SECTION 4).....	6
(B) TRANSFER OF CUSTOMERS (GCCR SECTION 5).....	7
(C) REPRESENTATIONS (GCCR SECTION 6)	7
(D) ADVERTISING (GCCR SECTION 7)	7
(E) MEETINGS BY AUI WITH RETAILERS AND CUSTOMERS (GCCR SECTION 8)	7
V. CONFIDENTIALITY OF CUSTOMER INFORMATION.....	7
(A) CONFIDENTIALITY RULE, DISCLOSURE OF CUSTOMER INFORMATION, AND DISCLOSURE TO TWO OR MORE RETAILERS AND CONDITIONS ON DISCLOSURE (GCCR SECTIONS 9, 10, 11 AND 12).....	7
(B) AGGREGATED CUSTOMER INFORMATION (GCCR SECTION 14)	10
VI. EQUALITY OF TREATMENT OF RETAILERS.....	10
(A) EQUAL TREATMENT (GCCR SECTION 15).....	10
(B) EQUAL NOTICE OF CHANGES (GCCR SECTION 16).....	11
VII. BUSINESS PRACTICE OF ALTAGAS	11
(A) CONDITIONS OF ACCESS TO WRITTEN COMMUNICATIONS WITH RETAILERS (GCCR SECTION 17).....	11
(B) PROHIBITIONS (GCCR SECTION 18).....	11
VIII. PREVENTING UNFAIR COMPETITIVE ADVANTAGE	11
(A) EFFICIENCY WITHOUT UNFAIR COMPETITION (GCCR SECTION 19)	11
(B) NON-DISCLOSURE OF ALTAGAS CUSTOMER INFORMATION FOR MARKETING OR SALES PURPOSES (GCCR SECTION 20).....	11
(C) ALTAGAS CUSTOMER INFORMATION FROM EMPLOYEES AND OTHERS (GCCR SECTION 21)	12
(E) GOODS AND SERVICES TRANSACTIONS TO BE AT FAIR MARKET VALUE (GCCR SECTION 23)	13
(F) FINANCIAL TRANSACTIONS (GCCR SECTION 24)	13
(G) ACCESS TO PUBLICLY AVAILABLE INFORMATION (GCCR SECTION 25)	13
IX. SEPARATE RECORDS AND ACCOUNTS	13
(A) RECORDS AND ACCOUNTS (GCCR SECTION 26)	13
(B) WRITTEN FINANCIAL TRANSACTIONS (GCCR SECTION 27)	14
(C) TRANSACTION RECORDS (GCCR SECTION 28)	14
(D) MAINTAINING RECORDS (GCCR SECTION 29)	15
X. COMPLIANCE PLANS AND REPORTS.....	15
(A) COMPLIANCE PLAN (GCCR SECTIONS 30 AND 32).....	15
(B) QUARTERLY AND ANNUAL COMPLIANCE REPORTS (GCCR SECTION 33).....	17
(C) PUBLIC NOTICE OF COMPLAINTS (GCCR SECTION 34)	18
(D) NO RELEASE FROM OBLIGATIONS UNDER REGULATION (GCCR SECTION 36)	18
XI. COMPLIANCE AUDIT	18
(A) APPOINTMENT OF AUDITOR (GCCR SECTION 38, GCCR SECTION 37)	18
XII. EXCEPTIONS	19
(A) EMERGENCY EXCEPTIONS (GCCR SECTION 42).....	19
APPENDIX A:	20
APPENDIX B:	21

AltaGas Ltd.
Gas Code of Conduct Regulation
Compliance Plan
March 2011

**ALTAGAS LTD.
GAS CODE OF CONDUCT REGULATION
COMPLIANCE PLAN**

I. INTRODUCTION

(A) PURPOSE OF ALTAGAS LTD. COMPLIANCE PLAN

AltaGas Ltd. ("AltaGas") is a corporation registered in Alberta that will provide Retail Services to Alberta energy consumers. AltaGas is an affiliate of AltaGas Utilities Inc. ("AUI"), a natural gas distribution company, as AltaGas owns a one hundred percent interest in AltaGas Utility Group Inc., the owner of AUI.

As a retailer in Alberta and as an affiliate of AUI, AltaGas is required pursuant to the Gas Utilities Act (Alberta) Code of Conduct Regulation to file and obtain approval of this Compliance Plan from the Alberta Utilities Commission.

AltaGas will be operated in a manner that is consistent with the GCCR, which mandates:

- (a) Equality of treatment of Customers by AltaGas;
- (b) Confidentiality of Customer Information;
- (c) Prevention of any unfair competitive advantage to affiliates of owners of gas distribution systems;
- (d) The maintenance of separate records and accounts by the owner of a gas distribution system and its affiliated Retailer;
- (e) The development of a Compliance Plan and ongoing compliance reports; and
- (f) Compliance Audits.

This Compliance Plan sets out the systems, policies and mechanisms that AltaGas will rely upon to ensure that the operations of AltaGas, as an affiliate of AUI, are conducted in a manner that is consistent with the requirements of the GCCR. The Compliance Plan will apply to all AltaGas Personnel.

AltaGas will not condone, encourage, or support any activity or behaviour on the part of AltaGas Personnel that is inconsistent with the requirements of the Compliance Plan or the GCCR, and is committed to implementing immediate and comprehensive responses to any such activity or behaviour upon becoming aware of it.

This Compliance Plan will become effective on the date that the Compliance Plan is approved by the Commission.

This Compliance Plan describes certain obligations and responsibilities of specified AltaGas management personnel. Notwithstanding this, and without otherwise reducing or eliminating the obligation and responsibility of the specified AltaGas management personnel to ensure any

AltaGas Ltd.
Gas Code of Conduct Regulation
Compliance Plan
March 2011

specific requirements of this Compliance Plan are satisfied, it is understood that all or a portion of the tasks described in this Compliance Plan may be delegated by the specified AltaGas management personnel to other AltaGas Personnel.

Copies of the Compliance Plan are available on the AltaGas website at www.altagas.ca. Questions or comments concerning the Compliance Plan should be directed to the Compliance Officer, AltaGas at 403-691-7575 or compliance.officer@altagas.ca or to the Alberta Utilities Commission, Audit and Compliance Group at 403-592-8845 or www.auc.ab.ca.

II. DEFINITIONS

In this Compliance Plan,

"**AltaGas**" means AltaGas Ltd., an affiliated retailer of AUI;

"**AltaGas Customer**" means a Customer of AltaGas who receives Retail Services;

"**AltaGas Customer Information**" means information that is not available to the public and that is uniquely associated with a AltaGas Customer, could be used to identify a AltaGas Customer, or is provided by a Customer to AltaGas;

"**AltaGas Personnel**" means the employees of AltaGas who, in their capacity as an employee of AltaGas, provide Retail Services or other services on behalf of AltaGas or other individuals, including agents and contractors, not employed by AltaGas that perform functions for, or undertake tasks on behalf of AltaGas who are designated as AltaGas Personnel in accordance with this Compliance Plan;

"**AltaGas Personnel List**" means the list of AltaGas Personnel prepared by the Compliance Officer;

"**Auditor**" means an independent auditor appointed by AltaGas, and approved by the Commission pursuant to Part 4 of the GCCR;

"**AUI**" means AltaGas Utilities Inc.;

"**AUI Customer**" means a Customer who receives Regulated Services from AUI;

"**AUI Customer Information**" means information that is not available to the public and that is uniquely associated with an AUI Customer; could be used to identify an AUI Customer, or is provided by a Customer to AUI;

"**CICA Handbook**" means the handbook published by the Canadian Institute of Chartered Accountants, as amended from time to time;

"**Commission**" means the Alberta Utilities Commission;

"**Compliance Plan**" means the compliance plan of AltaGas as approved by the Commission pursuant to the GCCR;

AltaGas Ltd.
Gas Code of Conduct Regulation
Compliance Plan
March 2011

"Compliance Plan Committee" means the committee of senior AltaGas management personnel responsible for overseeing, implementing and monitoring the Compliance Plan, and any necessary changes to the Compliance Plan, as required, which is chaired by the Compliance Officer and includes the following individuals:

- Chief Financial Officer;
- Both Co-Presidents Gas;
- Vice President Corporate Resources;
- Divisional Vice President Energy Services;
- President ECNG Energy LP or nominee; and
- Director, Information Technology;

"Compliance Officer" means the Vice President, General Counsel and Corporate Secretary of AltaGas;

"Compliance Plan Committee Report" means the report prepared quarterly by the Compliance Officer, containing the reports provided at, and minutes of, the quarterly meeting of the Compliance Plan Committee;

"Compliance Plan Contravention Investigation Report" means the report prepared by the Compliance Officer containing details of any alleged AltaGas contravention of the Compliance Plan or the GCCR as reported by a Person, directly or indirectly, to the Compliance Officer which shall include but not be limited to, the following information:

- (a) Date of the alleged contravention;
- (b) Date of the report of the alleged contravention to a supervisor or senior manager of AltaGas;
- (c) Date of the report of the alleged contravention to the Compliance Officer;
- (d) Description of the alleged contravention;
- (e) Person reporting the alleged contravention;
- (f) The relevant section of the Compliance Plan that applies to the issues raised by the alleged contravention; and
- (g) Conclusions of the Compliance Officer regarding the alleged contravention and the date upon which these conclusions were arrived at;

"Compliance Plan Contravention Report" means the report that summarizes the details of any AltaGas contravention of the Compliance Plan or the GCCR that is prepared by the Compliance Officer that shall include the contents of the Compliance Plan Contravention Investigation Report and the measures undertaken by AltaGas to address any contravention and prevent similar contraventions from occurring in the future;

"Customer" means a consumer of gas in Alberta who takes delivery of the gas at its place of consumption by means of the gas distribution system of a gas distributor;

AltaGas Ltd.
Gas Code of Conduct Regulation
Compliance Plan
March 2011

"Customer Information" means information that is not available to the public and that is uniquely associated with a Customer, could be used to identify a Customer, or is provided by a Customer to AltaGas, and includes but is not limited to AltaGas Customer Information;

"Electronic Customer Information Repository" means a separate password protected electronic repository that contains Customer Information, and has the equivalent standard of security protocol of other data repositories created and maintained by the Person that has primary control and operation of the electronic repository;

"Electronic Customer Information Repository Description" means a document that includes the following information relating to each Electronic Customer Information Repository:

- (a) Name, being a description of the name of the Electronic Customer Information Repository;
- (b) Description, being a summary of the nature of the Electronic Customer Information Repository and its general purpose;
- (c) Owner, being a description of the beneficial owner or licensee of the Electronic Customer Information Repository;
- (d) Customer Base Served, being a description of the AltaGas Customers that are served by the Electronic Customer Information Repository;
- (e) Data Type, being a notation of whether the Electronic Customer Information Repository contains Customer Information and/or Aggregated Customer Information;
- (f) Format, being a notation of whether the data in the Electronic Customer Information Repository is stored in a file or database format;
- (g) Accessible By, being a list of the AltaGas Personnel who shall have access to the Electronic Customer Information Repository; and
- (h) Compliance Requirements, being a list of the provisions of the Compliance Plan that apply to the Electronic Customer Information Repository;

"Electronic Customer Information Repository List" means a list of the Electronic Customer Information Repositories maintained and operated by AltaGas;

"Fair Market Value" means the price available in an open and unrestricted market between informed and prudent parties, acting at arm's length and under no compulsion to act, expressed in terms of money;

"Gas Services" means the services associated with providing gas to a person in Alberta;

"GCCR" means the Gas Code of Conduct Regulation made under the authority of the GUA;

"GUA" means the *Gas Utilities Act*;

AltaGas Ltd.
Gas Code of Conduct Regulation
Compliance Plan
March 2011

"**Person**" includes an individual or a corporation and the heirs, executors, administrators or other legal representatives of a person;

"**Regulated Services**" means Gas Services that are provided by AUI or the access to which or the use of which is controlled by AUI pursuant to a tariff approved by the Commission;

"**Retail Services**" means unregulated Gas Services provided by a Retailer;

"**Retailer**" means a person who sells or provides unregulated Gas Services directly to a Person.

III. CONDUCT OF ALTAGAS LTD.

(A) BEHAVIOUR OF ALTAGAS (GCCR SECTION 3)

AltaGas Policy 1: AltaGas Personnel shall conduct their activities in a manner so as to comply with and ensure compliance with the GCCR and this Compliance Plan.

Mechanism 1: Only AltaGas Personnel shall perform functions for or undertake tasks on behalf of AltaGas that are necessary for AltaGas to provide Retail Services. The Compliance Officer shall designate the AltaGas Personnel on the AltaGas Personnel List and shall maintain and update the AltaGas Personnel List on an ongoing basis.

Mechanism 2: AltaGas Personnel will be informed of the applicable requirements of the GCCR and the applicable requirements of the Compliance Plan by being required to: (a) read the Compliance Plan and (b) attend a training session, or alternatively review a videotape of a previously held training session, designed to address the applicable sections of the Compliance Plan. The timing of completion of this requirement will be within 3 months of the approval of this Compliance Plan by the Commission.

Mechanism 3: AltaGas Personnel will be informed of their obligation to immediately seek answers to all questions regarding the Compliance Plan and its impact on the specific role they perform in the provision of services to AltaGas from their immediate supervisor in the first instance. If there remains any doubt or confusion regarding an answer provided to a question the supervisor shall escalate the inquiry to a member of the Compliance Plan Committee. If there remains any doubt or confusion regarding an answer to a question, the member of the Compliance Plan Committee shall refer the matter to the Compliance Officer.

Mechanism 4: AltaGas Personnel will be required to execute an acknowledgement in the form of Appendix A acknowledging he/she has read this Compliance Plan and understands the obligations of AltaGas, and his/her personal obligations, under the Compliance Plan. If the Compliance Plan is amended, the amended provisions will be provided to the AltaGas Personnel to whom the amendment applies within 60 days of the date of the amendment coming into force and a supplementary acknowledgement will be obtained within this 60 day period.

**AltaGas Ltd.
Gas Code of Conduct Regulation
Compliance Plan
March 2011**

- Mechanism 5: Within 30 days after the end of each calendar year, all AltaGas Personnel whose names appear on the AltaGas Personnel List on December 31 of the prior calendar year, will be required to review this Compliance Plan and execute a confirmation in the form of Appendix B confirming that he/she has undertaken the required review of the Compliance Plan and has acted in accordance with the requirements of this Compliance Plan during the prior calendar year.
- Mechanism 6: The Compliance Plan will be posted on the AltaGas website for viewing by the public and AltaGas Personnel upon the approval of the Compliance Plan by the Commission;
- Mechanism 7: The Compliance Officer will review the contents of the AltaGas website on a quarterly basis to confirm the Compliance Plan posted by AltaGas is current and accurate. A record of this review shall be maintained by the Compliance Officer.
- Mechanism 8: Adherence to the Compliance Plan and the GCCR by AltaGas Personnel will be an important consideration taken into account by AltaGas in its assessment of the performance of AltaGas Personnel. Breach of the Compliance Plan by AltaGas Personnel may result in disciplinary action, up to and including termination of employment or contract with AltaGas.
- Mechanism 9: Employees who are added to the AltaGas Personnel List will be informed of the applicable requirements of the GCCR and the applicable requirements of the Compliance Plan by being required to: (a) read the Compliance Plan and (b) attend a training session, or alternatively review a videotape of a previously held training session, designed to address the applicable sections of the Compliance Plan within 30 days of being added to the AltaGas Personnel List.

IV. EQUALITY OF TREATMENT FOR CUSTOMERS

(A) TYING PROHIBITED (GCCR SECTION 4)

- AltaGas Policy 1: AltaGas Personnel shall not require or induce Customers to purchase any goods or services from AltaGas, or any other Retailer, by making or appearing to make the provision of Regulated Services conditional on those purchases.
- Mechanism 1: The Compliance Officer will each month review the standard form of AltaGas's billing envelope, its contents, and bill that will be distributed to AltaGas Customers to ensure that they do not contain language that requires or induces AltaGas Customers to purchase any goods or services from AltaGas or any other Retailer by making or appearing to make the provision of Regulated Services conditional on those purchases and will keep a written record of this review.
- Mechanism 2: The Divisional Vice President Energy Services shall keep a copy of all AltaGas consumer awareness and education materials and other AltaGas communications that will be distributed to AltaGas Customers, through the AltaGas billing envelope or otherwise, and the Compliance Officer will at least quarterly review the content of such materials and communications and will keep a written record of this review.

**AltaGas Ltd.
Gas Code of Conduct Regulation
Compliance Plan
March 2011**

(B) TRANSFER OF CUSTOMERS (GCCR SECTION 5)

Section 5 of the GCCR does not impose requirements or restrictions applicable to Retailers, including AltaGas.

(C) REPRESENTATIONS (GCCR SECTION 6)

AltaGas Policy 1: AltaGas Personnel shall not represent or imply in any way in communications with AltaGas Customers or in communications with the public that present or future customers of AltaGas will receive treatment from AUJ that is different from the treatment received by present or future Customers of other Retailers.

Mechanism 1: Same as Mechanism 1 under AltaGas Policy 1 in Section IV. (A).

Mechanism 2: Same as Mechanism 2 under AltaGas Policy 1 in Section IV. (A).

(D) ADVERTISING (GCCR SECTION 7)

AltaGas Policy 1: Unless the Commission advises AltaGas, in writing, that it has made a determination that the name and logo used by AltaGas and the names and logos used by AUJ clearly indicate they are separate entities, the Compliance Plan Committee shall ensure that AltaGas includes the conspicuous statements described in section 7 of the GCCR in any internet text or written material published or sent that markets Retail Services.

Mechanism 1: Same as Mechanism 1 under AltaGas Policy 1 in Section IV. (A).

Mechanism 2: Same as Mechanism 2 under AltaGas Policy 1 in Section IV. (A).

(E) MEETINGS BY AUJ WITH RETAILERS AND CUSTOMERS (GCCR SECTION 8)

Section 8 of the GCCR does not impose requirements or restrictions applicable to Retailers, including AltaGas.

V. CONFIDENTIALITY OF CUSTOMER INFORMATION

(A) CONFIDENTIALITY RULE, DISCLOSURE OF CUSTOMER INFORMATION, AND DISCLOSURE TO TWO OR MORE RETAILERS AND CONDITIONS ON DISCLOSURE (GCCR SECTIONS 9, 10, 11 AND 12)

AltaGas Policy 1: AltaGas Personnel shall protect the confidentiality and security of Customer Information and shall not, without written customer consent, disclose AltaGas Customer Information to any Person other than an individual whose name appears on the AltaGas Personnel List or as permitted under the GCCR.

Mechanism 1: Only AltaGas Personnel shall perform functions for or undertake tasks on behalf of AltaGas that are necessary for AltaGas to provide Retail Services. The Compliance Officer shall designate the AltaGas Personnel on the AltaGas

**AltaGas Ltd.
Gas Code of Conduct Regulation
Compliance Plan
March 2011**

Personnel List and shall maintain and update the AltaGas Personnel List on an ongoing basis.

Mechanism 2: AltaGas information in the form of electronic data will be maintained and stored only in an Electronic Customer Information Repository accessible only by AltaGas Personnel. AltaGas Customer Information shall also be accessible to AltaGas Personnel outside of their work premises through a secure password protected electronic connection to the Electronic Customer Information Repository.

Mechanism 3: On at least a quarterly basis, the Director Information Technology of AltaGas shall undertake a review of each Electronic Customer Information Repository maintained by AltaGas that contains AltaGas Customer Information and confirm that only AltaGas Personnel have electronic access to any Electronic Customer Information Repository maintained by AltaGas that contains AltaGas Customer Information. The Director Information Technology of AltaGas shall prepare a report summarizing the process undertaken to complete the review and the results of the review and provide a copy of this report to the Compliance Officer. If the report indicates that individuals other than AltaGas Personnel have obtained electronic access to any Electronic Customer Information Repository maintained by AltaGas that contains AltaGas Customer Information, the Compliance Officer shall prepare a Compliance Plan Contravention Report.

Mechanism 4: The Director Information Technology will prepare or update, if necessary, the Electronic Customer Information Repository Description for each Electronic Customer Information Repository maintained by AltaGas, on a quarterly basis, and provide any updated Electronic Customer Information Repository Description and updated Electronic Customer Information Repository List to the Compliance Officer.

Mechanism 5: The Compliance Officer will be required on a quarterly basis to approve, in writing, the content of the accessibility field in each Electronic Customer Information Repository Description associated with an Electronic Customer Information Repository maintained by AltaGas to ensure the access rights are consistent with the access granted under the Compliance Plan, and will maintain a written record of such approvals.

Mechanism 6: Arrangements for the off-site storage of AltaGas Customer Information in locations that are not premises of AltaGas will be made only by AltaGas Personnel or AltaGas personnel who have responsibility for arranging off-site storage. The off-site storage facility must have security features that will allow AltaGas to restrict access to the off-site storage only to individuals whose names appear on the AltaGas Personnel List and employees of the off-site storage facility.

AltaGas Policy 2: AltaGas Personnel shall not, except as set forth in this policy, be permitted access to AUI Customer Information. Excepted from this policy are AltaGas Personnel who require AUI Customer Information to provide gas management services or other services for AUI as approved by the

**AltaGas Ltd.
Gas Code of Conduct Regulation
Compliance Plan
March 2011**

Commission (“Gas Management Services”), AltaGas Personnel who have access to AUI Customer Information for this purpose shall utilize such information solely for the purpose of providing Gas Management Services and for no other purpose.

Mechanism 1: The AltaGas Personnel List will be maintained and updated quarterly by the Compliance Officer.

Mechanism 2: AltaGas Personnel who obtain or receive AUI Customer Information shall not make use of the AUI Customer Information except to provide Gas Management Services and shall forthwith report any use of AUI Customer Information unrelated to Gas Management Services to his/her supervisor. The supervisor shall ensure such use of AUI Customer Information unrelated to Gas Management Services is communicated to the Compliance Officer, who shall prepare a Compliance Plan Contravention Report and immediately provide the Compliance Plan Contravention Report to the Compliance Plan Committee.

Mechanism 3: AltaGas Personnel who become aware of any AltaGas Personnel using AUI Customer Information for purposes other than Gas Management Services shall forthwith report such occurrence to his/her supervisor. The supervisor shall ensure the occurrence is communicated to the Compliance Officer, who shall prepare a Compliance Plan Contravention Report and immediately provide the Compliance Plan Contravention Report to the Compliance Plan Committee.

AltaGas Policy 3: Other than as permitted pursuant to AltaGas Policy 2 V. (A). above, AltaGas Personnel who have direct interaction with AUI Customers shall not access an Electronic Customer Information Repository containing AUI Customer Information at any time during which he/she is providing services to AltaGas.

Mechanism 1: The Compliance Officer shall on a quarterly basis circulate a written notice to all AltaGas Personnel reminding them of this requirement.

AltaGas Policy 4: AltaGas Personnel are the only individuals that shall have authority to authorize the release of Customer Information to a Person.

Mechanism 1: The Compliance Officer shall maintain the AltaGas Personnel List and seek to ensure compliance with the AltaGas Code of Conduct such that only individuals whose names appear on the AltaGas Personnel List shall engage in the release of Customer Information in response to a written request of a AltaGas Customer to do so.

AltaGas Policy 5: AltaGas will respond to requests for Customer Information from all Customers and Retailers under the same terms and conditions, including the timing of the release and the format of the information released.

Mechanism 1: AltaGas Personnel will receive specific direction and oversight from the Divisional Vice President Energy Services regarding the scrutiny of the content of the form of consent required by the GCCR for AltaGas to release Customer Information.

**AltaGas Ltd.
Gas Code of Conduct Regulation
Compliance Plan
March 2011**

AltaGas will only accept an electronic or written consent and will not accept a verbal consent from a Customer to release his/her Customer Information.

Mechanism 2: The Divisional Vice President Energy Services will ensure paper or electronic copy of each written consent form is retained by AltaGas for a period of six years from the date on the consent form. The Divisional Vice President Energy Services will maintain a database of information related to customer consents that will track the following information:

- (a) The date the consent to disclose Customer Information was received by AltaGas;
- (b) The Customer Information that is authorized to be disclosed by the Customer;
- (c) The period of time that the Customer consent to release Customer Information is in effect;
- (d) Whether the consent of the Customer authorizes the Customer Information to be released to one, some, or all Retailers, and if the consent is limited to one or some Retailers, the name(s) of the Retailer(s);
- (e) The date the Customer Information is released by AltaGas to a Retailer, or Retailers; and
- (f) The AltaGas Personnel List.

AltaGas Policy 6: AltaGas will maintain separate work premises from those work premises occupied by AUI. AltaGas work premises shall not be considered AUI work premises as a result of AltaGas Personnel providing Gas Management Services to AUI as permitted herein.

Mechanism 1: On a quarterly basis, the Compliance Officer shall undertake a review of the AltaGas work premises to confirm that AltaGas premises are separate from AUI premises.

(B) AGGREGATED CUSTOMER INFORMATION (GCCR SECTION 14)

Section 14 of the GCCR does not impose requirements or restrictions applicable to Retailers, including AltaGas.

VI. EQUALITY OF TREATMENT OF RETAILERS

(A) EQUAL TREATMENT (GCCR SECTION 15)

Section 15 of the GCCR does not impose requirements or restrictions applicable to Retailers, including AltaGas.

AltaGas Ltd.
Gas Code of Conduct Regulation
Compliance Plan
March 2011

(B) EQUAL NOTICE OF CHANGES (GCCR SECTION 16)

Section 16 of the GCCR does not impose requirements or restrictions applicable to Retailers, including AltaGas.

VII. BUSINESS PRACTICE OF ALTAGAS

(A) CONDITIONS OF ACCESS TO WRITTEN COMMUNICATIONS WITH RETAILERS (GCCR SECTION 17)

Section 17 of the GCCR does not impose requirements or restrictions applicable to Retailers, including AltaGas.

(B) PROHIBITIONS (GCCR SECTION 18)

Section 18 of the GCCR does not impose requirements or restrictions applicable to Retailers, including AltaGas.

VIII. PREVENTING UNFAIR COMPETITIVE ADVANTAGE

(A) EFFICIENCY WITHOUT UNFAIR COMPETITION (GCCR SECTION 19)

AltaGas Policy 1: All sharing of costs between AUI and AltaGas shall reflect the appropriate allocation and recording of the economic benefits or costs between AUI and AltaGas and shall be tracked in separate records and accounts maintained by AUI and AltaGas.

Mechanism 1: Any cost-sharing arrangement between AUI and AltaGas, with the exception of an arrangement otherwise approved by the Commission, shall specify the percentage allocation of costs between AUI and AltaGas, include a description of the justification for the allocation, and will require the prior written approval of one of the:

Chief Executive Officer; or
Co-President Gas; or
Chief Financial Officer.

A record of the written approval will be maintained by the Chief Financial Officer for a period of no less than six years from the date the written approval is granted.

(B) NON-DISCLOSURE OF ALTAGAS CUSTOMER INFORMATION FOR MARKETING OR SALES PURPOSES (GCCR SECTION 20)

AltaGas Policy 1: AltaGas Personnel shall protect the confidentiality and security of Customer Information and shall not disclose Customer Information to any Person other than an individual whose name appears on the AltaGas Personnel List;

Mechanism 1: Same as Mechanism 1 under AltaGas Policy 1 in Section V.(A).

**AltaGas Ltd.
Gas Code of Conduct Regulation
Compliance Plan
March 2011**

Mechanism 2: Same as Mechanism 2 under AltaGas Policy 1 in Section V.(A).

Mechanism 3: Same as Mechanism 3 under AltaGas Policy 1 in Section V.(A).

Mechanism 4: Same as Mechanism 4 under AltaGas Policy 1 in Section V.(A).

Mechanism 5: Same as Mechanism 5 under AltaGas Policy 1 in Section V.(A).

Mechanism 6: Same as Mechanism 6 under AltaGas Policy 1 in Section V.(A).

AltaGas Policy 2: AltaGas Personnel who have direct interaction with AUI Customers shall not access an Electronic Customer Information Repository containing AUI Customer Information at any time during which he/she is providing services to AltaGas, except as set forth in AltaGas Policy 2 V. (A).

Mechanism 1: Same as Mechanism 1 under AltaGas Policy 2 in Section V.(A).

Mechanism 2: Same as Mechanism 2 under AltaGas Policy 2 in Section V.(A).

Mechanism 3: Same as Mechanism 3 under AltaGas Policy 2 in Section V.(A).

(C) ALTAGAS CUSTOMER INFORMATION FROM EMPLOYEES AND OTHERS (GCCR SECTION 21)

AltaGas Policy 1: AltaGas Personnel shall report to the Compliance Officer the identity of any Person whose name is not on the AltaGas Personnel List, who seeks to obtain AltaGas Customer Information by indicating that he/she has authority to receive AltaGas Customer Information from AltaGas Personnel when he/she does not in fact have such authority.

Mechanism 1: The Compliance Officer shall document all such reports received in writing, or any other form, and investigate all reports to determine if any AltaGas Customer Information was improperly sought or received. These reports shall be included in the quarterly Compliance Plan Committee Report.

Mechanism 2: Upon termination of their employment with AltaGas (voluntary or otherwise) AltaGas Personnel shall be informed of their obligation to continue to protect the confidentiality of Customer Information.

(D) JOINT ACQUISITIONS, RESEARCH, AND DISPOSITIONS (GCCR SECTION 22)

AltaGas Policy 1: The accounting for all joint acquisitions of products and/or services by AUI and AltaGas shall reflect an appropriate allocation and recording of the economic benefits or costs between AUI and AltaGas in a manner that is consistent with the benefits or costs attributable to AUI and AltaGas.

Mechanism 1: The Chief Financial Officer shall account for all joint acquisitions, research, and disposition in accordance with this AltaGas Policy and shall be responsible for recording, at the time of the transaction, an entry in the records and accounts of AUI and AltaGas of any joint purchases or acquisitions, the rationale for such

AltaGas Ltd.
Gas Code of Conduct Regulation
Compliance Plan
March 2011

joint purchase or acquisition, and the basis for the allocation of the economic benefits or costs between AUI and AltaGas. These records and accounts will be made available by AltaGas to the Auditor.

Mechanism 2: All joint acquisitions by AUI and AltaGas, with the exception of a joint acquisition otherwise approved by the Commission, shall be reported by the Chief Financial Officer to the Compliance Plan Committee at the first quarterly meeting following the joint acquisition.

(E) GOODS AND SERVICES TRANSACTIONS TO BE AT FAIR MARKET VALUE (GCCR SECTION 23)

AltaGas Policy 1: All transactions involving the sale, lease, exchange, transfer or other disposition of goods or services between AUI and AltaGas shall be at Fair Market Value.

Mechanism 1: The Chief Financial Officer shall approve the valuation of all sales, leases, exchanges, transfers or other dispositions of goods or services at Fair Market Value in accordance with this AltaGas Policy and shall be responsible for recording at the time of the transaction in the records and accounts of AUI and AltaGas all sales, leases, exchanges, transfers or other dispositions of goods or services and the rationale supporting the valuation. These records and accounts will be made available by AltaGas to the Auditor.

Mechanism 2: All transactions involving the sale, lease, exchange, transfer or other disposition of goods or services between AUI and AltaGas, with the exception of a sale, lease, exchange, transfer or other disposition of goods or services between AUI and AltaGas otherwise approved by the Commission, shall be reported by the Chief Financial Officer to the Compliance Plan Committee at the first quarterly meeting following the joint acquisition.

(F) FINANCIAL TRANSACTIONS (GCCR SECTION 24)

Section 24 of the GCCR does not impose requirements or restrictions applicable to Retailers, including AltaGas.

(G) ACCESS TO PUBLICLY AVAILABLE INFORMATION (GCCR SECTION 25)

Section 25 of the GCCR does not impose requirements or restrictions applicable to Retailers, including AltaGas.

IX. SEPARATE RECORDS AND ACCOUNTS

(A) RECORDS AND ACCOUNTS (GCCR SECTION 26)

AltaGas Policy 1: AUI and AltaGas shall have separate records and accounts.

Mechanism 1: The Chief Financial Officer will ensure the accounts and records of AUI and AltaGas are kept separate from each other and

**AltaGas Ltd.
Gas Code of Conduct Regulation
Compliance Plan
March 2011**

- (a) Sufficient records and accounts are maintained to enable an audit to be conducted under Part 4 of the GCCR;
- (b) That the accounts comply with any guidelines or uniform system of record keeping required by the Commission and generally accepted accounting principles.

(B) WRITTEN FINANCIAL TRANSACTIONS (GCCR SECTION 27)

AltaGas Policy 1: All financial transactions between AUI and AltaGas shall be in writing and shall be approved in advance by the Chief Financial Officer.

Mechanism 1: The Chief Financial Officer will ensure that all financial transactions recorded in the accounts and records of AUI and AltaGas are supported by written documentation describing and confirming the transaction.

Mechanism 2: The written documentation of financial transactions between AUI and AltaGas will be made available by AltaGas to the Auditor.

Mechanism 3: All financial transactions between AUI and AltaGas, with the exception of financial transactions approved by the Commission, shall be reported by the Chief Financial Officer to the Compliance Plan Committee at the first quarterly Compliance Plan Committee meeting following the financial transaction.

(C) TRANSACTION RECORDS (GCCR SECTION 28)

AltaGas Policy 1: AltaGas shall maintain a written record of all goods and services sold, leased, exchanged, given or otherwise disposed of between AUI and AltaGas, which shall include the value of the transaction expressed in terms of money.

AltaGas Policy 2: Transactions between AUI and AltaGas that involve goods or services sold, leased, exchanged, given, or otherwise disposed of between AUI and AltaGas in an amount greater than an annual amount of \$500,000, including transactions approved by the Commission, shall be documented by an agreement in writing and the valuation of the transaction shall reflect Fair Market Value.

Mechanism 1: The Chief Financial Officer will maintain a written record of all goods and services sold, leased, exchanged, given or otherwise disposed of between AUI and AltaGas which will include the value of the transaction expressed in terms of money.

Mechanism 2: If any transactions between AUI and AltaGas exceed \$500,000 annually, the Chief Financial Officer will obtain written evidence of Fair Market Value from an independent third party that has no financial interest in AUI or AltaGas and provide this evidence to the Compliance Plan Committee for its review and approval, unless the transaction has been otherwise approved by the Commission, prior to the transaction being completed. These records will be made available by AltaGas to the Auditor.

AltaGas Ltd.
Gas Code of Conduct Regulation
Compliance Plan
March 2011

(D) MAINTAINING RECORDS (GCCR SECTION 29)

AltaGas Policy 1: AltaGas shall maintain the records, accounts, financial transactions, reports and plans required by the GCCR and the Compliance Plan for a period of at least six (6) years.

Mechanism 1: The Compliance Officer and the Chief Financial Officer will jointly be responsible for making the necessary arrangements to maintain and store all records that must be maintained by AltaGas for the required period.

Mechanism 2: The records, accounts, financial transactions, reports and plans of AltaGas that must be maintained for the required period and which contain AltaGas Customer Information in the form of electronic or physical records will be accessible physically and/or through a password protected data system only by AltaGas Personnel in secure work premises or at an off-site storage facility. The off-site storage facility must have security features that will allow AltaGas to restrict access to the off-site storage only to individuals whose names appear on the AltaGas Personnel List, and employees of the off-site storage facility.

X. COMPLIANCE PLANS AND REPORTS**(A) COMPLIANCE PLAN (GCCR SECTIONS 30 AND 32)**

AltaGas Policy 1: All AltaGas Personnel shall conduct their activities in a manner that is in compliance with the GCCR and the Compliance Plan.

Mechanism 1: Same as Mechanism 1 under AltaGas Policy 1 in Section III.(A).

Mechanism 2: Same as Mechanism 2 under AltaGas Policy 1 in Section III.(A).

Mechanism 3: Same as Mechanism 3 under AltaGas Policy 1 in Section III.(A).

Mechanism 4: Same as Mechanism 4 under AltaGas Policy 1 in Section III.(A).

Mechanism 5: Same as Mechanism 5 under AltaGas Policy 1 in Section III.(A).

Mechanism 6: Same as Mechanism 6 under AltaGas Policy 1 in Section III.(A).

Mechanism 7: Same as Mechanism 7 under AltaGas Policy 1 in Section III.(A).

Mechanism 8: Same as Mechanism 8 under AltaGas Policy 1 in Section III.(A).

AltaGas Policy 2: AltaGas Personnel who become aware of circumstances that they believe may constitute a contravention of the Compliance Plan or the GCCR, shall forthwith report this information to the Compliance Officer.

AltaGas Policy 3: All complaints of alleged contraventions of the GCCR received by AltaGas from the public shall be referred to the Compliance Officer who shall acknowledge receipt of the complaint, in writing, within 5 days of AltaGas receiving the complaint.

**AltaGas Ltd.
Gas Code of Conduct Regulation
Compliance Plan
March 2011**

- Mechanism 1: The AltaGas website will provide information to the public describing how to report an alleged contravention of the GCCR to AltaGas or the Commission.
- Mechanism 2: Reports from the public of matters that may constitute a contravention of the Compliance Plan or the GCCR will be addressed by the Compliance Officer.
- Mechanism 3: Upon AltaGas receiving a complaint, the Compliance Officer will log the complaint and forthwith investigate the matter to determine if any contravention of the Compliance Plan or GCCR did occur. Upon completion of the investigation, the Compliance Officer will document the circumstances of alleged contravention in the Compliance Plan Contravention Investigation Report. The Compliance Officer will endeavour to resolve any complaint of alleged violation of the GCCR or the Compliance Plan with the member of the public that lodged the complaint within 20 days of AltaGas receiving the complaint. The Compliance Officer will keep a log of complaints received.
- Mechanism 4: If it is established that a contravention of the GCCR or the Compliance Plan has occurred, the Compliance Officer will prepare a Compliance Plan Contravention Report and immediately provide the Compliance Plan Contravention Report to the Compliance Plan Committee.
- Mechanism 5: The Compliance Officer is accountable for the development of the Compliance Plan and adherence to the Compliance Plan.
- Mechanism 6: Adherence to the Compliance Plan will be overseen and monitored by the Compliance Plan Committee by way of a quarterly meeting to:
- (a) Receive and review the updated AltaGas Personnel List and any updated Electronic Customer Information Repository descriptions relating to Electronic Customer Information Repositories maintained by AltaGas;
 - (b) Receive and review reports of any current AltaGas employee whose name is not on the AltaGas Personnel List who has sought or received Customer Information from any present or former officer, employee, agent, or contractor of AltaGas and provide any appropriate directions;
 - (c) Receive and review all Compliance Plan Contravention Investigation Reports prepared since the last quarterly meeting by the Compliance Officer and provide any appropriate directions;
 - (d) Receive and review all Compliance Plan Contravention Reports prepared since the last quarterly meeting by the Compliance Officer and provide any appropriate directions;
 - (e) Receive and review a report of all AltaGas consumer awareness and education materials and other AltaGas communications approved, since the last quarterly meeting of the Compliance Plan Committee, for distribution to the public pursuant to the Compliance Plan and provide any appropriate directions;

AltaGas Ltd.
Gas Code of Conduct Regulation
Compliance Plan
March 2011

- (f) Receive and review reports from the Chief Financial Officer regarding any joint acquisitions by AUI and AltaGas made since the last quarterly meeting;
- (g) Receive and review reports from the Chief Financial Officer involving any sale, lease, exchange, transfer, or other disposition of goods or services between AUI and AltaGas made since the last quarterly meeting;
- (h) Receive and review reports from the Chief Financial Officer describing any financial transactions between AUI and AltaGas made since the last quarterly meeting;
- (i) Receive and review reports from the Compliance Officer of any action taken by AltaGas or AltaGas Personnel in response to an emergency that threatens public safety or the safety of AltaGas Personnel;
- (j) Consider any necessary changes to the Compliance Plan that reflect changed circumstances or improved practices.

The Compliance Officer will maintain minutes of the Compliance Plan Committee meetings, which shall have appended to them copies of the Compliance Plan Investigation Reports and the Compliance Plan Contravention Reports that were received and reviewed by the Compliance Plan Committee.

Mechanism 7: The Compliance Officer and the Vice President Corporate Resources shall report to the Chief Executive Officer and shall not have a direct reporting relationship to the Divisional Vice President Energy Services.

Mechanism 8: The Compliance Plan Committee shall be accountable for:

- (a) Identifying proposed enhancements or improvements to the Compliance Plan and approving changes to the Compliance Plan, where appropriate;
- (b) Providing direction to individual members of the Compliance Plan Committee related to implementing and monitoring the Compliance Plan; and
- (c) Enforcing adherence to and ensuring compliance with the Compliance Plan and the GCCR by AltaGas Personnel.

Mechanism 9: The Compliance Plan Committee shall be responsible for ensuring that the AltaGas Personnel are informed that the Auditor has the authority to receive from AltaGas Personnel, and they shall provide to the Auditor, free and unfettered access to appropriate AltaGas Personnel, including the information systems of AltaGas, to complete the compliance audit requirements of the GCCR and the Compliance Plan in a timely and efficient manner.

(B) QUARTERLY AND ANNUAL COMPLIANCE REPORTS (GCCR SECTION 33)

AltaGas Policy 1: The Board of Directors of AltaGas shall be informed, on no less than a quarterly basis, of any alleged or actual contraventions of the Compliance Plan,

AltaGas Ltd.
Gas Code of Conduct Regulation
Compliance Plan
March 2011

the action taken to remedy any non-compliance, and any complaints for non-compliance with the GCCR or the Compliance Plan.

Mechanism 1: If there are complaints of non-compliance with the GCCR or the Compliance Plan by AltaGas, or if it is determined that AltaGas did not comply with the GCCR or the Compliance Plan, a report of the minutes of the Compliance Plan Committee meetings related to these matters will be provided to the Board of Directors of AltaGas and the Commission by the Compliance Officer within 60 days following the end of the quarter in which such complaint was received for each of the first three quarters of a calendar year or within 90 days following the end of the fourth quarter if such complaint was received in the fourth quarter.

Mechanism 2: Within 90 days following the end of each calendar year, AltaGas will send to the Commission, an annual compliance report, approved by the Board of Directors of AltaGas.

Mechanism 3: A Compliance Plan Committee Report will be provided to the Board of Directors of AltaGas by the Compliance Officer on a quarterly basis, within 60 days following the end of each of the first three quarters of a calendar year and within 90 days following the end of the fourth quarter.

(C) PUBLIC NOTICE OF COMPLAINTS (GCCR SECTION 34)

AltaGas Policy 1: AltaGas shall give notice to the public that complaints about contraventions of the GCCR may be made to the Commission.

Mechanism 1: Once per twelve month period commencing no later than 60 days after approval of the AltaGas Compliance Plan, AltaGas will include a text message directly on the Customer's bill, giving notice to the Customer that complaints about contraventions of the GCCR may be made to the Commission and that the Commission is independent of AltaGas. This notice shall be approved by the Commission prior to being placed by AltaGas.

(D) NO RELEASE FROM OBLIGATIONS UNDER REGULATION (GCCR SECTION 36)

AltaGas Policy 1: Compliance by AltaGas with the Compliance Plan does not release AltaGas Personnel from complying with the GCCR.

XI. COMPLIANCE AUDIT

(A) APPOINTMENT OF AUDITOR (ECCR SECTION 38, GCCR SECTION 37)

AltaGas Policy 1: AltaGas Personnel shall be required by AltaGas to fully co-operate with the Auditor appointed by AltaGas to perform an audit, composed of an independent examination of AltaGas operations for the purpose of expressing an opinion on the compliance by AltaGas with the GCCR and the Compliance Plan.

Mechanism 1: Employees of the Auditor shall provide reasonable proof to AltaGas Personnel of their identity prior to requesting access to AltaGas Customer Information.

**AltaGas Ltd.
Gas Code of Conduct Regulation
Compliance Plan
March 2011**

Mechanism 2: AltaGas shall afford the Auditor with complete and unfettered access to the records, information, and information systems of AltaGas and to AltaGas Personnel for the purpose of the Auditor completing its Audit.

Mechanism 3: AltaGas will cooperate with the Auditor and the Commission to accommodate any need for direct interaction between the Auditor and the Commission that the Auditor or the Commission may require during the course of the audit to fulfil its obligations under the GCCR.

XII. EXCEPTIONS

(A) EMERGENCY EXCEPTIONS (GCCR SECTION 42)

AltaGas Policy 1: Any action taken by AltaGas or AltaGas Personnel in response to an emergency that threatens public safety, the safety of AltaGas Personnel, does not contravene the Compliance Plan or the GCCR.

Mechanism 1: Any action taken by AltaGas or AltaGas Personnel in response to an emergency that threatens public safety, the safety of AltaGas Personnel, or any other Person that results in a breach of this Compliance Plan, will be forthwith reported in writing to the Compliance Officer who shall report such occurrence to the Commission within 10 days of the date of the breach and to the Compliance Plan Committee at the next quarterly meeting of the Compliance Plan Committee.

AltaGas Ltd.
Gas Code of Conduct Regulation
Compliance Plan
March 2011

**APPENDIX A:
ALTAGAS LTD. COMPLIANCE PLAN
COMPLIANCE ACKNOWLEDGEMENT**

Note: Terms utilized in this Compliance Acknowledgement are defined in the Definitions Section II. of the Compliance Plan.

AltaGas Ltd. (“AltaGas”), a corporation registered in Alberta, is committed to conducting its affairs in accordance with all applicable laws that govern AltaGas’ operations. The Compliance Plan was developed as part of that commitment. AltaGas Personnel are required to, fully and completely in all circumstances, comply with the policies and mechanisms contained in this Compliance Plan.

The undersigned AltaGas Personnel hereby acknowledges that he/she has received and read a copy of this Compliance Plan and understands both the obligations of AltaGas and his/her personal obligations, as described in this Compliance Plan, and undertakes to conduct himself/herself in a manner that is in accordance with the policies and mechanisms contained in this Compliance Plan.

The undersigned AltaGas Personnel hereby acknowledges that he/she will not seek preferential treatment for AltaGas from AUI.

The undersigned AltaGas Personnel acknowledge that it is his/her obligation and right to ask questions and seek clarification regarding the contents of this Compliance Plan from his/her supervisor if there is any uncertainty or question respecting his/her understanding of the policies and mechanisms described in this Compliance Plan.

Acknowledged and accepted this ___ day of _____, 20__.

Name

Name Printed

AltaGas Ltd.
Gas Code of Conduct Regulation
Compliance Plan
March 2011

**APPENDIX B:
ALTAGAS LTD. COMPLIANCE PLAN
COMPLIANCE CONFIRMATION**

Note: Terms utilized in this Compliance Confirmation are defined in the Definitions Section II of the Compliance Plan.

AltaGas Ltd. ("AltaGas"), a corporation registered in Alberta, is committed to conducting its affairs in accordance with all applicable laws that govern AltaGas's operations. The AltaGas Compliance Plan was developed as part of that commitment.

AltaGas Personnel are required to, fully and completely in all circumstances, comply with the policies and mechanisms contained in the AltaGas Compliance Plan.

AltaGas Agent or Contractor Personnel are required to, fully and completely in all circumstances, comply with the policies and mechanisms contained in the AltaGas Compliance Plan.

The undersigned AltaGas Personnel hereby confirms that he/she has reviewed the terms of this Compliance Plan within the past 30 days and further confirms he/she has complied with the requirements of the AltaGas Compliance Plan over the past calendar year, or portion thereof during which he/she was a member of the group of AltaGas Personnel. If this is not the case, this signatory shall describe all instances of non-compliance, in writing, in the area provided below or provide further documentation that contains a detailed description of any non-compliance.

Written description of any non-compliance (attach additional pages if necessary):

Acknowledged and accepted this ___ day of _____, 20__.

Name

Name Printed

ECNG ENERGY LP
GAS CODE OF CONDUCT REGULATION
COMPLIANCE PLAN
March, 2011

TABLE OF CONTENTS

I. INTRODUCTION	1
(A) PURPOSE OF ECNG ENERGY LP COMPLIANCE PLAN	1
II. DEFINITIONS	2
III. CONDUCT OF ECNG ENERGY LP	5
IV. EQUALITY OF TREATMENT FOR CUSTOMERS	6
(A) TYING PROHIBITED (GCCR SECTION 4)	6
(B) TRANSFER OF CUSTOMERS (GCCR SECTION 5)	7
(C) REPRESENTATIONS (GCCR SECTION 6).....	7
(D) ADVERTISING (GCCR SECTION 7).....	7
(E) MEETINGS BY AUI WITH RETAILERS AND CUSTOMERS (GCCR SECTION 8)	7
V. CONFIDENTIALITY OF CUSTOMER INFORMATION	8
(A) CONFIDENTIALITY RULE, DISCLOSURE OF CUSTOMER INFORMATION, AND DISCLOSURE TO TWO OR MORE RETAILERS AND CONDITIONS ON DISCLOSURE (GCCR SECTIONS 9,10,11 AND 12)	8
(B) AGGREGATED CUSTOMER INFORMATION (GCCR SECTION 14)	10
VI. EQUALITY OF TREATMENT OF RETAILERS	11
(A) EQUAL TREATMENT (GCCR SECTION 15)	11
(B) EQUAL NOTICE OF CHANGES (GCCR SECTION 16)	11
VII. BUSINESS PRACTICE OF ECNG ENERGY LP	11
(A) CONDITIONS OF ACCESS TO WRITTEN COMMUNICATIONS WITH RETAILERS (GCCR SECTION 17)	11
(B) PROHIBITIONS (GCCR SECTION 18).....	11
VIII. PREVENTING UNFAIR COMPETITIVE ADVANTAGE	11
(A) EFFICIENCY WITHOUT UNFAIR COMPETITION (GCCR SECTION 19).....	11
(B) NON-DISCLOSURE OF ECNG CUSTOMER INFORMATION FOR MARKETING OR SALES PURPOSES (GCCR SECTION 20).....	12
(C) ECNG CUSTOMER INFORMATION FROM EMPLOYEES AND OTHERS (GCCR SECTION 21).....	12
(E) GOODS AND SERVICES TRANSACTIONS TO BE AT FAIR MARKET VALUE (GCCR SECTION 23).....	13
(F) FINANCIAL TRANSACTIONS (GCCR SECTION 24).....	13
(G) ACCESS TO PUBLICLY AVAILABLE INFORMATION (GCCR SECTION 25).....	14
IX. SEPARATE RECORDS AND ACCOUNTS	14
(A) RECORDS AND ACCOUNTS (GCCR SECTION 26).....	14
(B) WRITTEN FINANCIAL TRANSACTIONS (GCCR SECTION 27).....	14
(C) TRANSACTION RECORDS (GCCR SECTION 28).....	14
(D) MAINTAINING RECORDS (GCCR SECTION 29)	15
X. COMPLIANCE PLANS AND REPORTS	15
(A) COMPLIANCE PLAN (GCCR SECTIONS 30 AND 32).....	15
(B) QUARTERLY AND ANNUAL COMPLIANCE REPORTS (GCCR SECTION 33)	18
(C) PUBLIC NOTICE OF COMPLAINTS (GCCR SECTION 34)	18
(D) NO RELEASE FROM OBLIGATIONS UNDER REGULATION (GCCR SECTION 36) 19	19
XI. COMPLIANCE AUDIT	19
(A) APPOINTMENT OF AUDITOR (GCCR SECTION 38, GCCR SECTION 37)	19
XII. EXCEPTIONS	19
(A) EMERGENCY EXCEPTIONS (GCCR SECTION 42)	19
APPENDIX A: Compliance Acknowledgement	20
APPENDIX B: Compliance Confirmation	21

ECNG Energy LP
Gas Code of Conduct Regulation
Compliance Plan
March 2011

**ECNG ENERGY LP
GAS CODE OF CONDUCT REGULATION
COMPLIANCE PLAN**

I. INTRODUCTION

(A) PURPOSE OF ECNG ENERGY LP COMPLIANCE PLAN

ECNG Energy LP ("ECNG") is a partnership registered in Alberta that will provide Retail Services to Alberta energy consumers. ECNG is an affiliate of AltaGas Utilities Inc. ("AUI"), a natural gas distribution company, as ECNG is an indirect wholly-owned subsidiary of AltaGas Ltd. and AltaGas Ltd. has an indirectly held 100.0 percent interest in AltaGas Utility Group Inc., the owner of AUI.

As a retailer in Alberta and as an affiliate of AUI, ECNG is required pursuant to the Gas Utilities Act (Alberta) Code of Conduct Regulation to file and obtain approval of this Compliance Plan from the Alberta Utilities Commission.

ECNG will be operated in a manner that is consistent with the GCCR, which mandates:

- (a) Equality of treatment of Customers by ECNG ;
- (b) Confidentiality of Customer Information;
- (c) Prevention of any unfair competitive advantage to affiliates of owners of gas distribution systems;
- (d) The maintenance of separate records and accounts by the owner of a gas distribution system and its affiliated Retailer;
- (e) The development of a Compliance Plan and ongoing compliance reports; and
- (f) Compliance Audits.

This Compliance Plan sets out the systems, policies and mechanisms that ECNG will rely upon to ensure that the operations of ECNG, as an affiliate of AUI, are conducted in a manner that is consistent with the requirements of the GCCR. The Compliance Plan will apply to all ECNG Personnel.

ECNG will not condone, encourage, or support any activity or behaviour on the part of ECNG Personnel that is inconsistent with the requirements of the Compliance Plan or the GCCR, and is committed to implementing immediate and comprehensive responses to any such activity or behaviour upon becoming aware of it.

This Compliance Plan will become effective on the date that the Compliance Plan is approved by the Commission.

This Compliance Plan describes certain obligations and responsibilities of specified AltaGas management personnel. Notwithstanding this, and without otherwise reducing or eliminating the

**ECNG Energy LP
Gas Code of Conduct Regulation
Compliance Plan
March 2011**

obligation and responsibility of the specified AltaGas management personnel to ensure any specific requirements of this Compliance Plan are satisfied, it is understood that all or a portion of the tasks described in this Compliance Plan may be delegated by the specified AltaGas management personnel to other ECNG Personnel.

Copies of the Compliance Plan are available on the AltaGas website at www.altagas.ca and on the ECNG website at www.ECNG.com. Questions or comments concerning the Compliance Plan should be directed to the Compliance Officer, AltaGas at 403-691-7575 or compliance.officer@altagas.ca or to the Alberta Utilities Commission, Audit and Compliance Group at 403-592-8845 or www.auc.ab.ca.

II. DEFINITIONS

In this Compliance Plan,

"**AltaGas**" means AltaGas Ltd., the administrator of ECNG;

"**Auditor**" means an independent auditor appointed by ECNG, and approved by the Commission pursuant to Part 4 of the GCCR;

"**AUI**" means AltaGas Utilities Inc.;

"**AUI Customer**" means a Customer who receives Regulated Services from AUI;

"**AUI Customer Information**" means information that is not available to the public and that is uniquely associated with an AUI Customer; could be used to identify an AUI Customer, or is provided by a Customer to AUI;

"**CICA Handbook**" means the handbook published by the Canadian Institute of Chartered Accountants, as amended from time to time;

"**Commission**" means the Alberta Utilities Commission;

"**Compliance Plan**" means the compliance plan of ECNG as approved by the Commission pursuant to the GCCR;

"**Compliance Plan Committee**" means the committee of senior AltaGas management personnel responsible for overseeing, implementing and monitoring the Compliance Plan, and any necessary changes to the Compliance Plan, as required, which is chaired by the Compliance Officer and includes the following individuals:

- Chief Financial Officer;
- Both Co-Presidents Gas;
- Vice President Corporate Resources;
- Divisional Vice President Energy Services;
- President ECNG Energy LP or nominee; and
- Director, Information Technology;

**ECNG Energy LP
Gas Code of Conduct Regulation
Compliance Plan
March 2011**

"Compliance Officer" means the Vice President, General Counsel and Corporate Secretary of AltaGas;

"Compliance Plan Committee Report" means the report prepared quarterly by the Compliance Officer, containing the reports provided at, and minutes of, the quarterly meeting of the Compliance Plan Committee;

"Compliance Plan Contravention Investigation Report" means the report prepared by the Compliance Officer containing details of any alleged ECNG contravention of the Compliance Plan or the GCCR as reported by a Person, directly or indirectly, to the Compliance Officer which shall include but not be limited to, the following information:

- (a) Date of the alleged contravention;
- (b) Date of the report of the alleged contravention to a supervisor or senior manager of AltaGas or ECNG;
- (c) Date of the report of the alleged contravention to the Compliance Officer;
- (d) Description of the alleged contravention;
- (e) Person reporting the alleged contravention;
- (f) The relevant section of the Compliance Plan that applies to the issues raised by the alleged contravention; and
- (g) Conclusions of the Compliance Officer regarding the alleged contravention and the date upon which these conclusions were arrived at;

"Compliance Plan Contravention Report" means the report that summarizes the details of any ECNG contravention of the Compliance Plan or the GCCR that is prepared by the Compliance Officer that shall include the contents of the Compliance Plan Contravention Investigation Report and the measures undertaken by ECNG to address any contravention and prevent similar contraventions from occurring in the future;

"Customer" means a consumer of gas in Alberta who takes delivery of the gas at its place of consumption by means of the gas distribution system of a gas distributor;

"Customer Information" means information that is not available to the public and that is uniquely associated with a Customer, could be used to identify a Customer, or is provided by a Customer to ECNG, and includes but is not limited to ECNG Customer Information;

"ECNG" means ECNG ENERGY LP, an affiliated retailer of AUI;

"ECNG Customer" means a Customer of ECNG who receives Retail Services;

"ECNG Customer Information" means information that is not available to the public and that is uniquely associated with a ECNG Customer, could be used to identify a ECNG Customer, or is provided by a Customer to ECNG;

**ECNG Energy LP
Gas Code of Conduct Regulation
Compliance Plan
March 2011**

"ECNG Personnel" means the employees of AltaGas who, in their capacity as an employee of AltaGas, provide Retail Services or other services on behalf of ECNG or other individuals, including agents and contractors, not employed by AltaGas that perform functions for, or undertake tasks on behalf of ECNG who are designated as ECNG Personnel in accordance with this Compliance Plan;

"ECNG Personnel List" means the list of ECNG Personnel prepared by the Compliance Officer;

"Electronic Customer Information Repository" means a separate password protected electronic repository that contains Customer Information, and has the equivalent standard of security protocol of other data repositories created and maintained by the Person that has primary control and operation of the electronic repository;

"Electronic Customer Information Repository Description" means a document that includes the following information relating to each Electronic Customer Information Repository:

- (a) Name, being a description of the name of the Electronic Customer Information Repository;
- (b) Description, being a summary of the nature of the Electronic Customer Information Repository and its general purpose;
- (c) Owner, being a description of the beneficial owner or licensee of the Electronic Customer Information Repository;
- (d) Customer Base Served, being a description of the ECNG Customers that are served by the Electronic Customer Information Repository;
- (e) Data Type, being a notation of whether the Electronic Customer Information Repository contains Customer Information and/or Aggregated Customer Information;
- (f) Format, being a notation of whether the data in the Electronic Customer Information Repository is stored in a file or database format;
- (g) Accessible By, being a list of the ECNG Personnel who shall have access to the Electronic Customer Information Repository; and
- (h) Compliance Requirements, being a list of the provisions of the Compliance Plan that apply to the Electronic Customer Information Repository;

"Electronic Customer Information Repository List" means a list of the Electronic Customer Information Repositories maintained and operated by ECNG;

"Fair Market Value" means the price available in an open and unrestricted market between informed and prudent parties, acting at arm's length and under no compulsion to act, expressed in terms of money;

"Gas Services" means the services associated with providing gas to a person in Alberta;

**ECNG Energy LP
Gas Code of Conduct Regulation
Compliance Plan
March 2011**

"**GCCR**" means the Gas Code of Conduct Regulation made under the authority of the GUA;

"**GUA**" means the *Gas Utilities Act*;

"**Person**" includes an individual or a corporation and the heirs, executors, administrators or other legal representatives of a person;

"**Regulated Services**" means Gas Services that are provided by AUI or the access to which or the use of which is controlled by AUI pursuant to a tariff approved by the Commission;

"**Retail Services**" means unregulated Gas Services provided by a Retailer;

"**Retailer**" means a person who sells or provides unregulated Gas Services directly to a Person.

III. CONDUCT OF ECNG ENERGY LP

(A) BEHAVIOUR OF ECNG (GCCR SECTION 3)

ECNG Policy 1: ECNG Personnel shall conduct their activities in a manner so as to comply with and ensure compliance with the GCCR and this Compliance Plan.

Mechanism 1: Only ECNG Personnel shall perform functions for or undertake tasks on behalf of ECNG that are necessary for ECNG to provide Retail Services. The Compliance Officer shall designate the ECNG Personnel on the ECNG Personnel List and shall maintain and update the ECNG Personnel List on an ongoing basis.

Mechanism 2: ECNG Personnel will be informed of the applicable requirements of the GCCR and the applicable requirements of the Compliance Plan by being required to: (a) read the Compliance Plan and (b) attend a training session, or alternatively review a videotape of a previously held training session, designed to address the applicable sections of the Compliance Plan. The timing of completion of this requirement will be within 3 months of the approval of this Compliance Plan by the Commission.

Mechanism 3: ECNG Personnel will be informed of their obligation to immediately seek answers to all questions regarding the Compliance Plan and its impact on the specific role they perform in the provision of services to ECNG from their immediate supervisor in the first instance. If there remains any doubt or confusion regarding an answer provided to a question the supervisor shall escalate the inquiry to a member of the Compliance Plan Committee. If there remains any doubt or confusion regarding an answer to a question, the member of the Compliance Plan Committee shall refer the matter to the Compliance Officer.

Mechanism 4: ECNG Personnel will be required to execute an acknowledgement in the form of Appendix A acknowledging he/she has read this Compliance Plan and understands the obligations of ECNG, and his/her personal obligations, under the Compliance Plan. If the Compliance Plan is amended, the amended provisions will be provided to the ECNG Personnel to whom the amendment applies within 60 days of the date of the amendment coming into force and a supplementary acknowledgement will be obtained within this 60 day period.

**ECNG Energy LP
Gas Code of Conduct Regulation
Compliance Plan
March 2011**

- Mechanism 5: Within 30 days after the end of each calendar year, all ECNG Personnel whose names appear on the ECNG Personnel List on December 31 of the prior calendar year, will be required to review this Compliance Plan and execute a confirmation in the form of Appendix B confirming that he/she has undertaken the required review of the Compliance Plan and has acted in accordance with the requirements of this Compliance Plan during the prior calendar year.
- Mechanism 6: The Compliance Plan will be posted on the AltaGas and ECNG websites for viewing by the public and ECNG Personnel upon the approval of the Compliance Plan by the Commission;
- Mechanism 7: The Compliance Officer will review the contents of the AltaGas website and the ECNG website on a quarterly basis to confirm the Compliance Plan posted by AltaGas and ECNG is current and accurate. A record of this review shall be maintained by the Compliance Officer.
- Mechanism 8: Adherence to the Compliance Plan and the GCCR by ECNG Personnel will be an important consideration taken into account by ECNG in its assessment of the performance of ECNG Personnel. Breach of the Compliance Plan by ECNG Personnel may result in disciplinary action, up to and including termination of employment or contract with AltaGas or ECNG.
- Mechanism 9: Employees who are added to the ECNG Personnel List will be informed of the applicable requirements of the GCCR and the applicable requirements of the Compliance Plan by being required to: (a) read the Compliance Plan and (b) attend a training session, or alternatively review a videotape of a previously held training session, designed to address the applicable sections of the Compliance Plan within 30 days of being added to the ECNG Personnel List.

IV. EQUALITY OF TREATMENT FOR CUSTOMERS

(A) TYING PROHIBITED (GCCR SECTION 4)

- ECNG Policy 1: ECNG Personnel shall not require or induce Customers to purchase any goods or services from ECNG, or any other Retailer, by making or appearing to make the provision of Regulated Services conditional on those purchases.
- Mechanism 1: The Compliance Officer will each month review the standard form of ECNG's billing envelope, its contents, and bill that will be distributed to ECNG Customers to ensure that they do not contain language that requires or induces ECNG Customers to purchase any goods or services from ECNG or any other Retailer by making or appearing to make the provision of Regulated Services conditional on those purchases and will keep a written record of this review.
- Mechanism 2: The Divisional Vice President Energy Services shall keep a copy of all ECNG consumer awareness and education materials and other ECNG communications that will be distributed to ECNG Customers, through the ECNG billing envelope or otherwise, and the Compliance Officer will at least quarterly review the content

**ECNG Energy LP
Gas Code of Conduct Regulation
Compliance Plan
March 2011**

of such materials and communications and will keep a written record of this review.

(B) TRANSFER OF CUSTOMERS (GCCR SECTION 5)

Section 5 of the GCCR does not impose requirements or restrictions applicable to Retailers, including ECNG.

(C) REPRESENTATIONS (GCCR SECTION 6)

ECNG Policy 1: ECNG Personnel shall not represent or imply in any way in communications with ECNG Customers or in communications with the public that present or future customers of ECNG will receive treatment from AUI that is different from the treatment received by present or future Customers of other Retailers.

Mechanism 1: Same as Mechanism 1 under ECNG Policy 1 in Section IV. (A).

Mechanism 2: Same as Mechanism 2 under ECNG Policy 1 in Section IV. (A).

(D) ADVERTISING (GCCR SECTION 7)

ECNG Policy 1: Unless the Commission advises ECNG, in writing, that it has made a determination that the name and logo used by ECNG and the names and logos used by AUI clearly indicate they are separate entities, the Compliance Plan Committee shall ensure that ECNG includes the conspicuous statements described in section 7 of the GCCR in any internet text or written material published or sent that markets Retail Services.

Mechanism 1: Same as Mechanism 1 under ECNG Policy 1 in Section IV. (A).

Mechanism 2: Same as Mechanism 2 under ECNG Policy 1 in Section IV. (A).

(E) MEETINGS BY AUI WITH RETAILERS AND CUSTOMERS (GCCR SECTION 8)

Section 8 of the GCCR does not impose requirements or restrictions applicable to Retailers, including ECNG.

ECNG Energy LP
Gas Code of Conduct Regulation
Compliance Plan
March 2011**V. CONFIDENTIALITY OF CUSTOMER INFORMATION****(A) CONFIDENTIALITY RULE, DISCLOSURE OF CUSTOMER INFORMATION, AND DISCLOSURE TO TWO OR MORE RETAILERS AND CONDITIONS ON DISCLOSURE (GCCR SECTIONS 9,10, 11 AND12)**

ECNG Policy 1: ECNG Personnel shall protect the confidentiality and security of Customer Information and shall not, without written customer consent, disclose ECNG Customer Information to any Person other than an individual whose name appears on the ECNG Personnel List or as permitted under the GCCR.

Mechanism 1: Only ECNG Personnel shall perform functions for or undertake tasks on behalf of ECNG that are necessary for ECNG to provide Retail Services. The Compliance Officer shall designate the ECNG Personnel on the ECNG Personnel List and shall maintain and update the ECNG Personnel List on an ongoing basis.

Mechanism 2: ECNG Information in the form of electronic data will be maintained and stored only in an Electronic Customer Information Repository accessible only by ECNG Personnel. ECNG Customer Information shall also be accessible to ECNG Personnel outside of their work premises through a secure password protected electronic connection to the Electronic Customer Information Repository.

Mechanism 3: On at least a quarterly basis, the Director Information Technology of AltaGas shall undertake a review of each Electronic Customer Information Repository maintained by ECNG that contains ECNG Customer Information and confirm that only ECNG Personnel have electronic access to any Electronic Customer Information Repository maintained by ECNG that contains ECNG Customer Information. The Director Information Technology of AltaGas shall prepare a report summarizing the process undertaken to complete the review and the results of the review and provide a copy of this report to the Compliance Officer. If the report indicates that individuals other than ECNG Personnel have obtained electronic access to any Electronic Customer Information Repository maintained by ECNG that contains ECNG Customer Information, the Compliance Officer shall prepare a Compliance Plan Contravention Report.

Mechanism 4: The Director Information Technology will prepare or update, if necessary, the Electronic Customer Information Repository Description for each Electronic Customer Information Repository maintained by ECNG, on a quarterly basis, and provide any updated Electronic Customer Information Repository Description and updated Electronic Customer Information Repository List to the Compliance Officer.

Mechanism 5: The Compliance Officer will be required on a quarterly basis to approve, in writing, the content of the accessibility field in each Electronic Customer Information Repository Description associated with an Electronic Customer Information Repository maintained by ECNG to ensure the access rights are consistent with the access granted under the Compliance Plan, and will maintain a written record of such approvals.

**ECNG Energy LP
Gas Code of Conduct Regulation
Compliance Plan
March 2011**

Mechanism 6: Arrangements for the off-site storage of ECNG Customer Information in locations that are not premises of ECNG, will be made only by ECNG Personnel or AltaGas personnel who have responsibility for arranging off-site storage. The off-site storage facility must have security features that will allow ECNG to restrict access to the off-site storage only to individuals whose names appear on the ECNG Personnel List and employees of the off-site storage facility.

ECNG Policy 2: ECNG Personnel shall not, except as set forth in this policy, be permitted access to AUI Customer Information. Excepted from this policy are ECNG Personnel who require AUI Customer Information to provide gas management services or other services for AUI as approved by the Commission ("Gas Management Services"). ECNG Personnel who have access to AUI Customer Information for this purpose shall utilize such information solely for the purpose of providing Gas Management Services and for no other purpose.

Mechanism 1: The ECNG Personnel List will be maintained and updated quarterly by the Compliance Officer.

Mechanism 2: ECNG Personnel who obtain or receive AUI Customer Information shall not make use of the AUI Customer Information except to provide Gas Management Services and shall forthwith report any use of AUI Customer Information unrelated to Gas Management Services to his/her supervisor. The supervisor shall ensure such use of AUI Customer Information unrelated to Gas Management Services is communicated to the Compliance Officer, who shall prepare a Compliance Plan Contravention Report and immediately provide the Compliance Plan Contravention Report to the Compliance Plan Committee.

Mechanism 3: ECNG Personnel who become aware of any ECNG Personnel using AUI Customer Information for purposes other than Gas Management Services shall forthwith report such occurrence to his/her supervisor. The supervisor shall ensure the occurrence is communicated to the Compliance Officer, who shall prepare a Compliance Plan Contravention Report and immediately provide the Compliance Plan Contravention Report to the Compliance Plan Committee.

ECNG Policy 3: Other than as permitted pursuant to ECNG Policy 2 V. (A). above, ECNG Personnel who have direct interaction with AUI Customers shall not access an Electronic Customer Information Repository containing AUI Customer Information at any time during which he/she is providing services to ECNG.

Mechanism 1: The Compliance Officer shall on a quarterly basis circulate a written notice to all ECNG Personnel reminding them of this requirement.

ECNG Policy 4: ECNG Personnel are the only individuals that shall have authority to authorize the release of Customer Information to a Person.

Mechanism 1: The Compliance Officer shall maintain the ECNG Personnel List and seek to ensure compliance with the ECNG Code of Conduct such that only individuals whose names appear on the ECNG Personnel List shall engage in the release of

**ECNG Energy LP
Gas Code of Conduct Regulation
Compliance Plan
March 2011**

Customer Information in response to a written request of a ECNG Customer to do so.

ECNG Policy 5: ECNG will respond to requests for Customer Information from all Customers and Retailers under the same terms and conditions, including the timing of the release and the format of the information released.

Mechanism 1: ECNG Personnel will receive specific direction and oversight from the Divisional Vice President Energy Services regarding the scrutiny of the content of the form of consent required by the GCCR for ECNG to release Customer Information. ECNG will only accept an electronic or written consent and will not accept a verbal consent from a Customer to release his/her Customer Information.

Mechanism 2: The Divisional Vice President Energy Services will ensure a paper or electronic copy of each written consent form is retained by ECNG for a period of six years from the date on the consent form. The Divisional Vice President Energy Services will maintain a database of information related to customer consents that will track the following information:

- (a) The date the consent to disclose Customer Information was received by ECNG;
- (b) The Customer Information that is authorized to be disclosed by the Customer;
- (c) The period of time that the Customer consent to release Customer Information is in effect;
- (d) Whether the consent of the Customer authorizes the Customer Information to be released to one, some, or all Retailers, and if the consent is limited to one or some Retailers, the name(s) of the Retailer(s);
- (e) The date the Customer Information is released by ECNG to a Retailer, or Retailers; and
- (f) The ECNG Personnel List.

ECNG Policy 6: ECNG will maintain separate work premises from those work premises occupied by AUI. ECNG work premises shall not be considered AUI work premises as a result of ECNG Personnel providing Gas Management Services to AUI as permitted herein.

Mechanism 1: On a quarterly basis, the Compliance Officer shall undertake a review of the ECNG work premises to confirm that ECNG premises are separate from AUI premises.

(B) AGGREGATED CUSTOMER INFORMATION (GCCR SECTION 14)

Section 14 of the GCCR does not impose requirements or restrictions applicable to Retailers, including ECNG.

**ECNG Energy LP
Gas Code of Conduct Regulation
Compliance Plan
March 2011**

VI. EQUALITY OF TREATMENT OF RETAILERS

(A) EQUAL TREATMENT (GCCR SECTION 15)

Section 15 of the GCCR does not impose requirements or restrictions applicable to Retailers, including ECNG.

(B) EQUAL NOTICE OF CHANGES (GCCR SECTION 16)

Section 16 of the GCCR does not impose requirements or restrictions applicable to Retailers, including ECNG.

VII. BUSINESS PRACTICE OF ECNG ENERGY LP

**(A) CONDITIONS OF ACCESS TO WRITTEN COMMUNICATIONS WITH RETAILERS
(GCCR SECTION 17)**

Section 17 of the GCCR does not impose requirements or restrictions applicable to Retailers, including ECNG.

(B) PROHIBITIONS (GCCR SECTION 18)

Section 18 of the GCCR does not impose requirements or restrictions applicable to Retailers, including ECNG.

VIII. PREVENTING UNFAIR COMPETITIVE ADVANTAGE

(A) EFFICIENCY WITHOUT UNFAIR COMPETITION (GCCR SECTION 19)

ECNG Policy 1: All sharing of costs between AUI and ECNG shall reflect the appropriate allocation and recording of the economic benefits or costs between AUI and ECNG and shall be tracked in separate records and accounts maintained by AUI and ECNG.

Mechanism 1: Any cost-sharing arrangement between AUI and ECNG, with the exception of an arrangement otherwise approved by the Commission, shall specify the percentage allocation of costs between AUI and ECNG, include a description of the justification for the allocation, and will require the prior written approval of one of the:

Chief Executive Officer; or
Co-President Gas; or
Chief Financial Officer.

A record of the written approval will be maintained by the Chief Financial Officer for a period of no less than six years from the date the written approval is granted.

**ECNG Energy LP
Gas Code of Conduct Regulation
Compliance Plan
March 2011**

(B) NON-DISCLOSURE OF ECNG CUSTOMER INFORMATION FOR MARKETING OR SALES PURPOSES (GCCR SECTION 20)

ECNG Policy 1: ECNG Personnel shall protect the confidentiality and security of Customer Information and shall not disclose Customer Information to any Person other than an individual whose name appears on the ECNG Personnel List;

Mechanism 1: Same as Mechanism 1 under ECNG Policy 1 in Section V.(A).

Mechanism 2: Same as Mechanism 2 under ECNG Policy 1 in Section V.(A).

Mechanism 3: Same as Mechanism 3 under ECNG Policy 1 in Section V.(A).

Mechanism 4: Same as Mechanism 4 under ECNG Policy 1 in Section V.(A).

Mechanism 5: Same as Mechanism 5 under ECNG Policy 1 in Section V.(A).

Mechanism 6: Same as Mechanism 6 under ECNG Policy 1 in Section V.(A).

ECNG Policy 2: ECNG Personnel who have direct interaction with AUI Customers shall not access an Electronic Customer Information Repository containing AUI Customer Information at any time during which he/she is providing services to ECNG, except as set forth in ECNG Policy 2 V. (A).

Mechanism 1: Same as Mechanism 1 under ECNG Policy 2 in Section V.(A).

Mechanism 2: Same as Mechanism 2 under ECNG Policy 2 in Section V.(A).

Mechanism 3: Same as Mechanism 3 under ECNG Policy 2 in Section V.(A).

(C) ECNG CUSTOMER INFORMATION FROM EMPLOYEES AND OTHERS (GCCR SECTION 21)

ECNG Policy 1: ECNG Personnel shall report to the Compliance Officer the identity of any Person whose name is not on the ECNG Personnel List, who seeks to obtain ECNG Customer Information by indicating that he/she has authority to receive ECNG Customer Information from ECNG Personnel when he/she does not in fact have such authority.

Mechanism 1: The Compliance Officer shall document all such reports received in writing, or any other form, and investigate all reports to determine if any ECNG Customer Information was improperly sought or received. These reports shall be included in the quarterly Compliance Plan Committee Report.

Mechanism 2: Upon termination of their employment with AltaGas (voluntary or otherwise) ECNG Personnel shall be informed of their obligation to continue to protect the confidentiality of Customer Information.

**ECNG Energy LP
Gas Code of Conduct Regulation
Compliance Plan
March 2011**

(D) JOINT ACQUISITIONS, RESEARCH, AND DISPOSITIONS (GCCR SECTION 22)

ECNG Policy 1: The accounting for all joint acquisitions of products and/or services by AUI and ECNG shall reflect an appropriate allocation and recording of the economic benefits or costs between AUI and ECNG in a manner that is consistent with the benefits or costs attributable to AUI and ECNG.

Mechanism 1: The Chief Financial Officer shall account for all joint acquisitions, research, and disposition in accordance with this ECNG policy and shall be responsible for recording, at the time of the transaction, an entry in the records and accounts of AUI and ECNG of any joint purchases or acquisitions, the rationale for such joint purchase or acquisition, and the basis for the allocation of the economic benefits or costs between AUI and ECNG. These records and accounts will be made available by ECNG to the Auditor.

Mechanism 2: All joint acquisitions by AUI and ECNG, with the exception of a joint acquisition otherwise approved by the Commission, shall be reported by the Chief Financial Officer to the Compliance Plan Committee at the first quarterly meeting following the joint acquisition.

(E) GOODS AND SERVICES TRANSACTIONS TO BE AT FAIR MARKET VALUE (GCCR SECTION 23)

ECNG Policy 1: All transactions involving the sale, lease, exchange, transfer or other disposition of goods or services between AUI and ECNG shall be at Fair Market Value.

Mechanism 1: The Chief Financial Officer shall approve the valuation of all sales, leases, exchanges, transfers or other dispositions of goods or services at Fair Market Value in accordance with this ECNG policy and shall be responsible for recording at the time of the transaction in the records and accounts of AUI and ECNG all sales, leases, exchanges, transfers or other dispositions of goods or services and the rationale supporting the valuation. These records and accounts will be made available by ECNG to the Auditor.

Mechanism 2: All transactions involving the sale, lease, exchange, transfer or other disposition of goods or services between AUI and ECNG, with the exception of a sale, lease, exchange, transfer or other disposition of goods or services between AUI and ECNG otherwise approved by the Commission, shall be reported by the Chief Financial Officer to the Compliance Plan Committee at the first quarterly meeting following the joint acquisition.

(F) FINANCIAL TRANSACTIONS (GCCR SECTION 24)

Section 24 of the GCCR does not impose requirements or restrictions applicable to Retailers, including ECNG.

**ECNG Energy LP
Gas Code of Conduct Regulation
Compliance Plan
March 2011**

(G) ACCESS TO PUBLICLY AVAILABLE INFORMATION (GCCR SECTION 25)

Section 25 of the GCCR does not impose requirements or restrictions applicable to Retailers, including ECNG.

IX. SEPARATE RECORDS AND ACCOUNTS

(A) RECORDS AND ACCOUNTS (GCCR SECTION 26)

ECNG Policy 1: AUI and ECNG shall have separate records and accounts.

Mechanism 1: The Chief Financial Officer will ensure the accounts and records of AUI and ECNG are kept separate from each other and

- (a) Sufficient records and accounts are maintained to enable an audit to be conducted under Part 4 of the GCCR;
- (b) That the accounts comply with any guidelines or uniform system of record keeping required by the Commission and generally accepted accounting principles.

(B) WRITTEN FINANCIAL TRANSACTIONS (GCCR SECTION 27)

ECNG Policy 1: All financial transactions between AUI and ECNG shall be in writing and shall be approved in advance by the Chief Financial Officer.

Mechanism 1: The Chief Financial Officer will ensure that all financial transactions recorded in the accounts and records of AUI and ECNG are supported by written documentation describing and confirming the transaction.

Mechanism 2: The written documentation of financial transactions between AUI and ECNG will be made available by ECNG to the Auditor.

Mechanism 3: All financial transactions between AUI and ECNG, with the exception of financial transactions approved by the Commission, shall be reported by the Vice President Finance and Chief Financial Officer to the Compliance Plan Committee at the first quarterly Compliance Plan Committee meeting following the financial transaction.

(C) TRANSACTION RECORDS (GCCR SECTION 28)

ECNG Policy 1: ECNG shall maintain a written record of all goods and services sold, leased, exchanged, given or otherwise disposed of between AUI and ECNG, which shall include the value of the transaction expressed in terms of money.

ECNG Policy 2: Transactions between AUI and ECNG that involve goods or services sold, leased, exchanged, given, or otherwise disposed of between AUI and ECNG in an amount greater than an annual amount of \$500,000, including transactions approved by the Commission, shall be documented by an agreement in writing and the valuation of the transaction shall reflect Fair Market Value.

**ECNG Energy LP
Gas Code of Conduct Regulation
Compliance Plan
March 2011**

Mechanism 1: The Vice President Finance and Chief Financial Officer will maintain a written record of all goods and services sold, leased, exchanged, given or otherwise disposed of between AUI and ECNG which will include the value of the transaction expressed in terms of money.

Mechanism 2: If any transactions between AUI and ECNG exceed \$500,000 annually, the Chief Financial Officer will obtain written evidence of Fair Market Value from an independent third party that has no financial interest in AUI or ECNG and provide this evidence to the Compliance Plan Committee for its review and approval, unless the transaction has been otherwise approved by the Commission, prior to the transaction being completed. These records will be made available by ECNG to the Auditor.

(D) MAINTAINING RECORDS (GCCR SECTION 29)

ECNG Policy 1: ECNG shall maintain the records, accounts, financial transactions, reports and plans required by the GCCR and the Compliance Plan for a period of at least six (6) years.

Mechanism 1: The Compliance Officer and the Vice President Finance and Chief Financial Officer will jointly be responsible for making the necessary arrangements to maintain and store all records that must be maintained by ECNG for the required period.

Mechanism 2: The records, accounts, financial transactions, reports and plans of ECNG that must be maintained for the required period and which contain ECNG Customer Information in the form of electronic or physical records will be accessible physically and/or through a password protected data system only by ECNG Personnel in secure work premises or at an off-site storage facility. The off-site storage facility must have security features that will allow ECNG to restrict access to the off-site storage only to individuals whose names appear on the ECNG Personnel List, and employees of the off-site storage facility.

X. COMPLIANCE PLANS AND REPORTS

(A) COMPLIANCE PLAN (GCCR SECTIONS 30 AND 32)

ECNG Policy 1: All ECNG Personnel shall conduct their activities in a manner that is in compliance with the GCCR and the Compliance Plan.

Mechanism 1: Same as Mechanism 1 under ECNG Policy 1 in Section III.(A).

Mechanism 2: Same as Mechanism 2 under ECNG Policy 1 in Section III.(A).

Mechanism 3: Same as Mechanism 3 under ECNG Policy 1 in Section III.(A).

Mechanism 4: Same as Mechanism 4 under ECNG Policy 1 in Section III.(A).

Mechanism 5: Same as Mechanism 5 under ECNG Policy 1 in Section III.(A).

**ECNG Energy LP
Gas Code of Conduct Regulation
Compliance Plan
March 2011**

Mechanism 6: Same as Mechanism 6 under ECNG Policy 1 in Section III.(A).

Mechanism 7: Same as Mechanism 7 under ECNG Policy 1 in Section III.(A).

Mechanism 8: Same as Mechanism 8 under ECNG Policy 1 in Section III.(A).

ECNG Policy 2: ECNG Personnel who become aware of circumstances that they believe may constitute a contravention of the Compliance Plan or the GCCR, shall forthwith report this information to the Compliance Officer.

ECNG Policy 3: All complaints of alleged contraventions of the GCCR received by ECNG from the public shall be referred to the Compliance Officer who shall acknowledge receipt of the complaint, in writing, within 5 days of ECNG receiving the complaint.

Mechanism 1: The ECNG website will provide information to the public describing how to report an alleged contravention of the GCCR to ECNG or the Commission.

Mechanism 2: Reports from the public of matters that may constitute a contravention of the Compliance Plan or the GCCR will be addressed by the Compliance Officer.

Mechanism 3: Upon ECNG receiving a complaint, the Compliance Officer will log the complaint and forthwith investigate the matter to determine if any contravention of the Compliance Plan or GCCR did occur. Upon completion of the investigation, the Compliance Officer will document the circumstances of alleged contravention in the Compliance Plan Contravention Investigation Report. The Compliance Officer will endeavour to resolve any complaint of alleged violation of the GCCR or the Compliance Plan with the member of the public that lodged the complaint within 20 days of ECNG receiving the complaint. The Compliance Officer will keep a log of complaints received.

Mechanism 4: If it is established that a contravention of the GCCR or the Compliance Plan has occurred, the Compliance Officer will prepare a Compliance Plan Contravention Report and immediately provide the Compliance Plan Contravention Report to the Compliance Plan Committee.

Mechanism 5: The Compliance Officer is accountable for the development of the Compliance Plan and adherence to the Compliance Plan.

Mechanism 6: Adherence to the Compliance Plan will be overseen and monitored by the Compliance Plan Committee by way of a quarterly meeting to:

- (a) Receive and review the updated ECNG Personnel List and any updated Electronic Customer Information Repository descriptions relating to Electronic Customer Information Repositories maintained by ECNG;
- (b) Receive and review reports of any current AltaGas employee whose name is not on the ECNG Personnel List who has sought or received Customer Information from any present or former officer, employee, agent, or contractor of ECNG and provide any appropriate directions;

**ECNG Energy LP
Gas Code of Conduct Regulation
Compliance Plan
March 2011**

- (c) Receive and review all Compliance Plan Contravention Investigation Reports prepared since the last quarterly meeting by the Compliance Officer and provide any appropriate directions;
- (d) Receive and review all Compliance Plan Contravention Reports prepared since the last quarterly meeting by the Compliance Officer and provide any appropriate directions;
- (e) Receive and review a report of all ECNG consumer awareness and education materials and other ECNG communications approved, since the last quarterly meeting of the Compliance Plan Committee, for distribution to the public pursuant to the Compliance Plan and provide any appropriate directions;
- (f) Receive and review reports from the Vice President Finance and Chief Financial Officer regarding any joint acquisitions by AUI and ECNG made since the last quarterly meeting;
- (g) Receive and review reports from the Vice President Finance and Chief Financial Officer involving any sale, lease, exchange, transfer, or other disposition of goods or services between AUI and ECNG made since the last quarterly meeting;
- (h) Receive and review reports from the Vice President Finance and Chief Financial Officer describing any financial transactions between AUI and ECNG made since the last quarterly meeting;
- (i) Receive and review reports from the Compliance Officer of any action taken by ECNG or ECNG Personnel in response to an emergency that threatens public safety or the safety of ECNG Personnel;
- (j) Consider any necessary changes to the Compliance Plan that reflect changed circumstances or improved practices.

The Compliance Officer will maintain minutes of the Compliance Plan Committee meetings, which shall have appended to them copies of the Compliance Plan Investigation Reports and the Compliance Plan Contravention Reports that were received and reviewed by the Compliance Plan Committee.

Mechanism 7: The Compliance Officer and the Vice President Corporate Resources shall report to the Chief Executive Officer and shall not have a direct reporting relationship to the Divisional Vice President Energy Services.

Mechanism 8: The Compliance Plan Committee shall be accountable for:

- (a) Identifying proposed enhancements or improvements to the Compliance Plan and approving changes to the Compliance Plan, where appropriate;

**ECNG Energy LP
Gas Code of Conduct Regulation
Compliance Plan
March 2011**

- (b) Providing direction to individual members of the Compliance Plan Committee related to implementing and monitoring the Compliance Plan; and
- (c) Enforcing adherence to and ensuring compliance with the Compliance Plan and the GCCR by ECNG Personnel.

Mechanism 9: The Compliance Plan Committee shall be responsible for ensuring that the ECNG Personnel are informed that the Auditor has the authority to receive from ECNG Personnel, and they shall provide to the Auditor, free and unfettered access to appropriate ECNG Personnel, including the information systems of ECNG, to complete the compliance audit requirements of the GCCR and the Compliance Plan in a timely and efficient manner.

(B) QUARTERLY AND ANNUAL COMPLIANCE REPORTS (GCCR SECTION 33)

ECNG Policy 1: The Board of Directors of AltaGas shall be informed, on no less than a quarterly basis, of any alleged or actual contraventions of the Compliance Plan, the action taken to remedy any non-compliance, and any complaints for non-compliance with the GCCR or the Compliance Plan.

Mechanism 1: If there are complaints of non-compliance with the GCCR or the Compliance Plan by ECNG, or if it is determined that ECNG did not comply with the GCCR or the Compliance Plan, a report of the minutes of the Compliance Plan Committee meetings related to these matters will be provided to the Board of Directors of AltaGas and the Commission by the Compliance Officer within 60 days following the end of the quarter in which such complaint was received for each of the first three quarters of a calendar year or within 90 days following the end of the fourth quarter if such complaint was received in the fourth quarter.

Mechanism 2: Within 90 days following the end of each calendar year, ECNG will send to the Commission, an annual compliance report, approved by the Board of Directors of AltaGas.

Mechanism 3: A Compliance Plan Committee Report will be provided to the Board of Directors of AltaGas by the Compliance Officer on a quarterly basis, within 60 days following the end of each of the first three quarters of a calendar year and within 90 days following the end of the fourth quarter.

(C) PUBLIC NOTICE OF COMPLAINTS (GCCR SECTION 34)

ECNG Policy 1: ECNG shall give notice to the public that complaints about contraventions of the GCCR may be made to the Commission.

Mechanism 1: Once per twelve month period commencing no later than 60 days after approval of the ECNG Compliance Plan, ECNG will include a text message directly on the Customer's bill, giving notice to the Customer that complaints about contraventions of the GCCR may be made to the Commission and that the Commission is independent of ECNG. This notice shall be approved by the Commission prior to being placed by ECNG.

**ECNG Energy LP
Gas Code of Conduct Regulation
Compliance Plan
March 2011**

(D) NO RELEASE FROM OBLIGATIONS UNDER REGULATION (GCCR SECTION 36)

ECNG Policy 1: Compliance by ECNG with the Compliance Plan does not release ECNG Personnel from complying with the GCCR.

XI. COMPLIANCE AUDIT

(A) APPOINTMENT OF AUDITOR (ECCR SECTION 38, GCCR SECTION 37)

ECNG Policy 1: ECNG Personnel shall be required by ECNG to fully co-operate with the Auditor appointed by ECNG to perform an audit, composed of an independent examination of ECNG operations for the purpose of expressing an opinion on the compliance by ECNG with the GCCR and the Compliance Plan.

Mechanism 1: Employees of the Auditor shall provide reasonable proof to ECNG Personnel of their identity prior to requesting access to ECNG Customer Information.

Mechanism 2: ECNG shall afford the Auditor with complete and unfettered access to the records, information, and information systems of ECNG and to ECNG Personnel for the purpose of the Auditor completing its Audit.

Mechanism 3: ECNG will cooperate with the Auditor and the Commission to accommodate any need for direct interaction between the Auditor and the Commission that the Auditor or the Commission may require during the course of the audit to fulfil its obligations under the GCCR.

XII. EXCEPTIONS

(A) EMERGENCY EXCEPTIONS (GCCR SECTION 42)

ECNG Policy 1: Any action taken by ECNG or ECNG Personnel in response to an emergency that threatens public safety, the safety of ECNG Personnel, does not contravene the Compliance Plan or the GCCR.

Mechanism 1: Any action taken by ECNG or ECNG Personnel in response to an emergency that threatens public safety, the safety of ECNG Personnel, or any other Person that results in a breach of this Compliance Plan, will be forthwith reported in writing to the Compliance Officer who shall report such occurrence to the Commission within 10 days of the date of the breach and to the Compliance Plan Committee at the next quarterly meeting of the Compliance Plan Committee.

**ECNG Energy LP
Gas Code of Conduct Regulation
Compliance Plan
March 2011**

**APPENDIX A:
COMPLIANCE ACKNOWLEDGEMENT**

Note: Terms utilized in this Compliance Acknowledgement are defined in the Definitions Section II. of the Compliance Plan.

ECNG ENERGY LP ("ECNG"), a partnership registered in Alberta, is committed to conducting its affairs in accordance with all applicable laws that govern ECNG's operations. The Compliance Plan was developed as part of that commitment. ECNG Personnel are required to, fully and completely in all circumstances, comply with the policies and mechanisms contained in this Compliance Plan.

The undersigned ECNG Personnel hereby acknowledges that he/she has received and read a copy of this Compliance Plan and understands both the obligations of ECNG and his/her personal obligations, as described in this Compliance Plan, and undertakes to conduct himself/herself in a manner that is in accordance with the policies and mechanisms contained in this Compliance Plan.

The undersigned ECNG Personnel hereby acknowledges that he/she will not seek preferential treatment for ECNG from AUI.

The undersigned ECNG Personnel acknowledge that it is his/her obligation and right to ask questions and seek clarification regarding the contents of this Compliance Plan from his/her supervisor if there is any uncertainty or question respecting his/her understanding of the policies and mechanisms described in this Compliance Plan.

Acknowledged and accepted this ___ day of _____, 20__.

Name

Name Printed

ECNG Energy LP
Gas Code of Conduct Regulation
Compliance Plan
March 2011

**APPENDIX B:
ECNG Energy LP
COMPLIANCE CONFIRMATION**

Note: Terms utilized in this Compliance Confirmation are defined in the Definitions Section II of the Compliance Plan.

ECNG ENERGY LP ("ECNG"), a partnership registered in Alberta, is committed to conducting its affairs in accordance with all applicable laws that govern ECNG's operations. The ECNG Compliance Plan was developed as part of that commitment.

ECNG Personnel are required to, fully and completely in all circumstances, comply with the policies and mechanisms contained in the ECNG Compliance Plan.

ECNG Agent or Contractor Personnel are required to, fully and completely in all circumstances, comply with the policies and mechanisms contained in the ECNG Compliance Plan.

The undersigned ECNG Personnel hereby confirms that he/she has reviewed the terms of this Compliance Plan within the past 30 days and further confirms he/she has complied with the requirements of the ECNG Compliance Plan over the past calendar year, or portion thereof during which he/she was a member of the group of ECNG Personnel. If this is not the case, this signatory shall describe all instances of non-compliance, in writing, in the area provided below or provide further documentation that contains a detailed description of any non-compliance.

Written description of any non-compliance (attach additional pages if necessary):

Acknowledged and accepted this ___ day of _____, 20__.

Name

Name Printed