

AMERICAN MIDSTREAM (ALATENN), LLC
STANDARDS OF CONDUCT COMPLIANCE PROCEDURES

April 3, 2019

American Midstream, LLC owns the entire interest in American Midstream (AlaTenn), LLC. This document establishes the procedures (“Compliance Procedures”) that this interstate natural gas pipeline (“Transmission Provider”) has instituted in compliance with the Federal Energy Regulatory Commission’s (“Commission”) Order No. 717 adopting revised standards of conduct (“Standards of Conduct”).

Pursuant to Section 358.7(d) of the Commission’s regulations, Transmission Provider has posted these Compliance Procedures on its Internet website. Pursuant to Section 358.8(b)(2), Transmission Provider has distributed the written procedures to all its transmission function employees, marketing function employees, officers, directors, supervisory employees, and any other employees likely to become privy to transmission function information.

Pursuant to Section 358.8(c)(1), Transmission Provider will train transmission function employees, marketing function employees, officers, directors, supervisory employees, and any other employees likely to become privy to transmission function information, including contract personnel, regarding implementation of, and compliance with, the Standards of Conduct. New employees, including new contract personnel, receive training within 30 days of their employment. Employees, including contract personnel, have been and will continue to be required on an annual basis to complete either a live training class or a computer-based training program. Employees completing the live training have executed a certificate indicating that the employee has undergone training required by the Standards of Conduct. The computer-based training program, upon completion, automatically generates a record indicating that the relevant employee has undergone training regarding the Standards of Conduct. Transmission Provider maintains these records in its files. All of Transmission Provider’s employees, including contract personnel, have been directed to comply with the Standards of Conduct to the fullest extent.

When used in these Compliance Procedures:

1. The phrase “marketing function employee” means an employee, contractor, consultant or agent of Transmission Provider or its affiliate who actively and personally engages on a day-to-day basis in marketing functions; and
2. The phrase “transmission function employee” means an employee, contractor, consultant or agent of Transmission Provider who actively and personally engages on a day-to-day basis in transmission functions.

As Transmission Provider’s Chief FERC Compliance Officer (“Compliance Officer”), Nadine Moustafa is responsible for implementation of and compliance with the Standards of Conduct.

I. Compliance Procedures – Non-discrimination requirements
(18 C.F.R. § 358.4(a)-(d))

1. Transmission Provider strictly enforces all tariff provisions relating to the sale or purchase of open access transmission service, if the tariff provisions do not permit the use of discretion.

2. Transmission Provider applies all tariff provisions relating to the sale or purchase of open access transmission service in a fair and impartial manner that treats all transmission customers in a not unduly discriminatory manner, if the tariff provisions permit the use of discretion.
3. Transmission Provider does not, through its tariff or otherwise, give undue preference to any person in matters relating to the sale or purchase of transmission service (including, but not limited to, issues of price, curtailments, scheduling, priority, ancillary services, or balancing).
4. Transmission Provider processes all similar requests for transmission in the same manner and within the same period of time.
5. Pursuant to 18 C.F.R. § 358.7(i), Transmission Provider posts on its website notice of each waiver of a tariff provision that it grants in favor of an affiliate, unless such waiver has been approved by the Commission. The postings are made within one business day of the act of a waiver. Transmission Provider also maintains a log of the acts of waiver that is available to the Commission upon request. The records are kept for a period of five years from the date of each act of waiver.
6. Transmission Provider has designated one or more employees who are responsible for tracking waiver information, for posting waiver information in a timely manner and for updating and maintaining the waiver log.

II. Compliance Procedures – Independent Functioning Rule
(18 C.F.R. § 358.5(a)-(b))

1. Transmission Provider's transmission function employees function independently from its marketing function employees except for emergency situations as permitted by the Standards of Conduct.
 - a. Transmission Provider has identified all of its transmission function employees and marketing function employees by requesting information on existing job duties from the business unit directors who have operational knowledge regarding day-to-day requirements of the various positions.
2. Transmission Provider does not permit its marketing function employees to conduct transmission functions.
3. Transmission Provider does not permit its marketing function employees to have access to the system control center or similar facilities used for transmission function operations that differs in any way from the access available to other transmission customers.
 - a. Security devices have been installed to prevent marketing function employees from having access to or otherwise viewing transmission function information.

- b. Interstate Gas Control Center data or other information is not broadcasted, disseminated, or otherwise made available or accessible to marketing function employees.
- 4. Transmission Provider does not permit its transmission function employees to conduct marketing functions.
 - a. However, Transmission Provider permits transmission function employees to buy and sell gas for operational reasons, including balancing fuel usage, to effectuate cashouts and deplete or replenish line pack. Since these operational sales do not fall under the definition of “marketing functions,” Transmission Provider has no employees engaged in a marketing function as defined by the Standards of Conduct.

III. Compliance Procedures – No Conduit Rule (18 C.F.R. § 358.6(a)-(b))

- 1. Transmission Provider does not use anyone as a conduit for the disclosure of non-public transmission function information to its marketing function employees.
 - a. In order to ensure effectuation of this policy, Transmission Provider has trained or will train all transmission function employees, marketing function employees, officers, directors, supervisory employees, and any other employees likely to become privy to transmission function information regarding the Standards of Conduct. Marketing function employees do not have access to transmission function information.
- 2. An employee, contractor, consultant, or agent of a transmission provider and an employee, contractor, consultant, or agent of an affiliate of a transmission provider that is engaged in marketing functions do not disclose non-public transmission function information to any of the Transmission Provider’s marketing function employees.
- 3. Transmission Provider instructs its employees not to share transmission, customer, or market information with any marketing function employee and not to act or to use any person as a conduit of any such information to any marketing function employee.
 - a. In order to ensure effectuation of this policy, Transmission Provider has trained or will train all relevant employees, contractors, consultants, and agents regarding the Standards of Conduct. Marketing function employees, contractors, consultants, and agents do not have access to transmission function information. As a part of training, employees are provided the Compliance Officer’s contact information and are encouraged to contact him with any questions regarding the disclosure of information or the Standards of Conduct generally.

IV. Compliance Procedures – Transparency Rule (18 C.F.R. § 358.7(a)-(i))

A. Contemporaneous disclosure

- 1. Transmission Provider instructs its employees not to share non-public transmission function information (“Protected Information”) with any marketing function employees

and not to act or to use any person as a conduit to disclose Protected Information to any marketing function employees. By completing the training program, each employee affirms his or her understanding of the Standards of Conduct and the requirement not to act as a conduit for sharing Protected Information with any marketing function employees.

2. Transmission Provider instructs its employees not to share non-public transmission customer information, critical energy infrastructure information (CEII), or any other information the Commission by law has determined to be subject to limited dissemination (collectively, "Protected Customer Information"), with any marketing function employees and not to act or to use any person as a conduit to disclose Protected Customer Information to any marketing function employees. By completing the training program, each employee affirms his or her understanding of the Standards of Conduct and the requirement not to act as a conduit for sharing Protected Customer Information with any marketing function employees.
3. As part of the training program, employees are encouraged to contact the Compliance Officer with any questions regarding the inadvertent disclosure of Protected Information or Protected Customer Information to marketing function employees.
4. In the event of a disclosure of protected information contrary to the provisions of §358.6 (No Conduit Rule), Transmission Provider immediately posts the information that was disclosed on its Internet Website.
5. In the event of a disclosure of Protected Customer Information contrary to the provisions of §358.6 (No Conduit Rule), Transmission Provider immediately posts the notice that the information was disclosed on its Internet Web site.

B. Voluntary consent provision

1. Transmission Provider may obtain voluntary consent in writing by a transmission customer to allow the Transmission Provider to disclose the transmission's customer's non-public information to the transmission provider's marketing function employees. If the transmission customer permits Transmission Provider to disclose this information to its marketing function employees, then Transmission Provider posts notice of the consent on its Internet Web sites along with a statement that they did not provide any preferences, operational or rate related, in exchange for the voluntary consent. It is Transmission Provider's standard practice to post the consent prior to the information being given.
2. Prior to providing a marketing function employee with shipper information, the marketing function employee must provide the Compliance Officer with a copy of the agency agreement where voluntary consent for the Transmission Provider to provide shipper information is given or a letter from the shipper stating voluntary consent has been given. If a customer is requesting that its information be given to a marketing affiliate employee, then the customer must provide Transmission Provider with a letter of consent.

C. Posting written procedures on the public internet

1. Transmission Provider has posted these written procedures on its public Internet Web site implementing the Standards of Conduct.

D. Identification of affiliate information on the public Internet.

1. Transmission Provider has identified and posted on its Internet Web sites the names and addresses of all its affiliates that employ or retain marketing function employees.
2. Transmission Provider has identified and posted on its Internet Web sites a complete list of the employee staffed facilities shared by any of the Transmission Provider's transmission function employees and marketing function employees. These lists include the types of facilities shared and the addresses of the facilities.
3. Transmission Provider posts information concerning potential merger partners as affiliates that may employ or retain marketing function employees within seven days after the potential merger is announced. Its employees with such information are instructed to notify the Compliance Officer about information pertaining to potential merger partners that will employ or retain marketing function employees upon consummation of the merger. The Compliance Officer is responsible for ensuring that the merger-related information is posted in a timely manner.

E. Identification of employee information on the public Internet.

1. Transmission Provider has posted on its Internet Web site the job titles and job descriptions of its transmission function employees.
2. Transmission Provider posts notice on its Internet Web site any transfer of a transmission function employee to a position as a marketing function employee, or any transfer of a marketing function employee to a position as a transmission function employee. Any information so posted remains on its Internet Web site for 90 days. Information to be posted includes the name of the transferring employee, the respective titles held while performing each function, and the effective date of the transfer.
3. Employees of Transmission Provider are not prohibited from transferring among such functions as long as such transfers are not used to circumvent the Standards of Conduct. Transmission Provider does not engage in the practice of cycling employees.
4. To prevent the cycling of employees between Transmission Provider's marketing function employees and its transmission function employees, Transmission Provider tracks information related to proposed employee transfers, including, but not limited to, the name of the employee to be transferred, the employee's current job title, a description of the employee's current job duties, the employee's future job title, and a description of the employee's future job duties. All transfers of employees between marketing functions and transmission functions will be reviewed in advance by the Compliance Officer, who assesses whether the transfer is permissible under the Standards of Conduct.

5. The Compliance Officer posts, deletes, or revises, as applicable, any posting required under the Standards of Conduct that is affected by any employee transfer. Employee transfers will be posted on the Transmission Provider's Internet website within seven business days of the effective date of such transfer.

F. Timing and general requirements of postings on the public Internet

1. Transmission Provider updates on its Internet Web sites the information required by part 358 within seven business days of any change, and it posts the date on which the information was updated.
2. Through training, employees are aware of the posting requirements and have been instructed to notify the Compliance Officer of any triggering event. The Compliance Officer is responsible for ensuring the activity is posted in accordance with the Standards of Conduct.
3. All of Transmission Provider's Internet Web site postings are sufficiently prominent as to be readily accessible. On the Transmission Provider's parent's public Web site, there is a prominent link for "FERC Info" where all information required to be posted is located.

G. Exclusion for and recordation of certain information exchanges.

1. Any exchange of non-public transmission information, as permissible under 18 C.F.R. § 358.7(h)(2), between Transmission Provider's transmission function employees and marketing function employees is captured contemporaneously via a written log or notes, voice recording, or e-mail. Transmission Provider retains these records for five years and such records are available to the Commission upon request.

V. Compliance Procedures – Implementation Requirements
(18 C.F.R. § 358.8(a)-(d))

A. Compliance Measures and Written Procedures

1. Transmission Provider has implemented measures to ensure the Independent Functioning requirement and the No Conduit rule are observed by its employees and by the employees of its affiliates. These measures include the distribution of these written procedures, the implementation of relevant policies and procedures, and the training of all employees per the Standards of Conduct.
2. Transmission Provider has distributed written procedures implementing the Standards of Conduct to all its transmission function employees, marketing function employees, officers, directors, supervisory employees, and any other employees likely to become privy to transmission function information.
3. As required under Section 358.7(d) and Order No. 717, Transmission Provider posted on its Internet websites its written procedures for implementing the Standards of Conduct.

4. These Compliance Procedures are sufficiently detailed to enable customers and the Commission to determine that Transmission Provider is in compliance with the Standards of Conduct.
5. Transmission Provider will revise these Compliance Procedures as necessary.

B. Training and Compliance Personnel (18 C.F.R. § 358.8(c))

1. Transmission Provider may develop a computer based Standards of Conduct training program. Transmission Provider has trained or will train Transmission Provider employees, including transmission function employees, marketing function employees, officers, directors, supervisory employees, and any other employees likely to become privy to transmission function information, regarding implementation of, and compliance with the Standards of Conduct. Further, Transmission Provider trains contractors and new employees promptly after its employment date.
2. Employees who completed live training executed a certificate at the end of its training signifying that such employees participated in the training. Completion of the computer-based training program generates a record indicating whether the individual successfully completed the computer-based training program.
3. Employees subject to the training requirements will receive annual Standards of Conduct training as required by Order 717 and periodic training as changes in the Standards of Conduct and clarifications in case law may warrant.
4. Transmission Provider has designated Nadine Moustafa as its Chief FERC Compliance Officer:

Nadine Moustafa
2103 CityWest Blvd., Bldg. 4, Suite 800
Houston, TX 77042
(346) 241-3412
NMoustafa@americanmidstream.com

This information is also posted on Transmission Provider's Internet Web site.

5. Ms. Moustafa is the contact for Commission staff for Transmission Providers' Standards of Conduct compliance issues.
6. The Compliance Officer is responsible for supervising the implementation of the Standards of Conduct, monitoring ongoing compliance, and establishing, effecting and maintaining the employee training program required by 18 C.F.R. § 358.8 (c)(1). The Compliance Officer also provides guidance and direction to employees, and answers any employee questions regarding the Standards of Conduct. The Compliance Officer is directly involved in the daily operation of the pipelines. Consequently, the Compliance Officer is able to directly monitor employee compliance with the Standards of Conduct.

C. Books and Records (18 C.F.R. § 358.8(d))

1. Transmission Provider currently maintains its books of account and records separately from those of its affiliates that employ or retain marketing function employees and keep these available for Commission inspection. Transmission Provider will continue to do so.