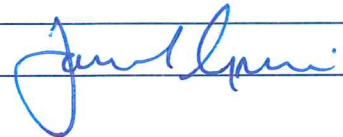


TEXAS RELIABILITY ENTITY CORPORATE POLICY

Document Name:	Confidentiality and Information Classification Corporate Policy
Document ID:	TRE POL 3.0
Effective Date:	July 1, 2010
Owner:	General Counsel
Governs:	Texas RE Personnel
Approved:	President and CEO 

I. Purpose

The purpose of this corporate policy is to describe the requirements for classifying and handling confidential and other information.

II. Requirements

- A. Texas RE Personnel shall maintain the confidentiality of all Confidential Information and shall only copy, disclose, and distribute Confidential Information to (1) Texas RE Personnel who have signed Texas RE Ethics Agreements; (2) the owner of and entity submitting such Confidential Information to Texas RE (Submitting Party); and (3) other individuals or entities as required by law, including but not limited to NERC and FERC, in accordance with the NERC Rules of Procedure.
- B. Texas RE Personnel shall appropriately mark Texas RE information as it is created, in accordance with the information classifications listed in Section III of this Policy.
- C. When feasible, tangible information should be marked on the bottom right-hand corner.
- D. Any Submitting Party shall mark any information that it reasonably believes contains confidential information as "Confidential" prior to submitting to Texas RE. This marking shall clearly indicate the category the confidential information falls into, as outlined in NERC Rules of Procedure (NROP) Section 1500. If applicable, the Submitting Party shall indicate any prohibition on disclosure due to any PUCT or FERC-approved rule or any state or federal law and shall provide supporting references and details on such prohibition.
- E. Upon request for, and prior to any disclosure of information marked "Confidential" by a Submitting Party, Texas RE Personnel must comply with the requirements of the Information Request Corporate Procedure, TRE PRO 3.1.
- F. If a Submitting Party determines that information for which it had sought confidential treatment no longer qualifies for such treatment, the Submitting Party shall promptly notify Texas RE, in accordance with Section 1500 of NROP.
- G. Texas RE Personnel must return any Texas RE Confidential Information to Texas RE, prior to termination of employment.
- H. Texas RE is permitted to disclose the following:



1. Confirmed Reliability Standards Violations – Texas RE may disclose a violation at or after the point when:
 - (a) the matter is filed with FERC as a notice of penalty, or
 - (b) the alleged violator and Texas RE or NERC reach a settlement regarding the violation.
2. Compliance Information – Texas RE and NERC are permitted to exchange Confidential Information related to evaluations, audits, and investigations in furtherance of the compliance and enforcement program, on condition they continue to maintain the confidentiality of such information.
3. ERCOT Protocol or Operating Guide Violations – Texas RE may disclose any material occurrence of non-compliance to the PUCT staff pursuant to the PUCT contract.

III. Classification of Information

- A. Texas RE information and information entrusted to Texas RE falls within one of three sensitivity classifications: Public, Limited, and Confidential. The three sensitivity classifications are defined as follows:
 1. **Public:** Information officially released for widespread public disclosure, either by requirement or as the result of a Texas RE management decision. Texas RE Personnel shall give careful consideration before classifying Information as Public or releasing Information outside of Texas RE.
 2. **Limited:** Information intended for internal use within Texas RE. Release of this Information represents a minimal risk to Texas RE or others entrusting Information to Texas RE.
 3. **Confidential:** Information that is or contains “Confidential Information” as defined in TRE PRO 1.1.
- B. Information is classified according to its most sensitive details.
- C. The default classification for any information that is not marked is **Limited**. Any information posted on the Internet (except if posted in a secured and restricted manner) will automatically be classified as **Public** and does not need to be marked.

IV. Roles and Accountabilities

- A. All Texas RE Personnel are responsible for carefully maintaining the confidentiality of Confidential Information. The Information Custodian, as defined in TRE PRO 1.1, is responsible for ensuring that all tangible Texas RE information is appropriately marked.
- B. Texas RE Personnel are responsible for ensuring all proper classification measures are exercised in accordance with this policy, supporting procedures and as determined by the Information Custodian and/or Information Owner (see TRE PRO 1.1).
- C. Texas RE Personnel shall report violations of this policy to Texas RE Legal.



-
- D. Any person engaged in NERC or regional entity activities as described in the Federal Power Act who violates this corporate policy may lose access to Confidential Information on a temporary or permanent basis and may be subject to legal action.
 - E. Any Texas RE Personnel who violate this corporate policy may be subject to adverse personnel action, up to and including termination and legal action.
 - F. The General Counsel is responsible for updating this corporate policy.
 - G. The Records Coordinator, in coordination with the General Counsel, is responsible for providing education and training for Texas RE staff regarding information classification.