

 Platte River Power Authority	<h1>Policy</h1>	Version #: 3.1 Original Effective Date: 08/24/2006 Next Review Date: 06/01/2023
	TITLE: Market Manipulation Prohibition Policy	Page 1 of 3

Purpose:

Prohibit any and all activities that constitute market manipulation as described under Section 222 of the Federal Power Act and the Code of Federal Regulations, Title 18, Part 1c.2. Implement a training program for Platte River employees on the subject of market manipulation and audit the activities of employees engaged in the purchase and sale of electric energy and transmission services on a regular basis.

Policy:

Pursuant to Resolution No. 12-18, it is the express policy of Platte River Power Authority (Platte River) to prohibit any and all activities that constitute market manipulation as described under Section 222 of the Federal Power Act and the Code of Federal Regulations, Title 18, Part 1c.2.

Any employee who engages in activities that constitute market manipulation as defined under the above-cited provisions shall be subject to discipline, up to and including possible termination of employment.

The Manager of Generation Dispatch and Power Markets, with appropriate help from the General Counsel, will develop a training program for Platte River employees on the subject of market manipulation. The purpose of the training program is to familiarize Platte River employees with the legal prohibitions pertaining to market manipulation as well as their rights and obligations under this policy. Training shall be given to appropriate employees no less than once each year, and to new employees as necessary.

The Manager of Internal Audit shall audit the employees engaged in the purchase and sale of electric energy and transmission services on a regular basis, but no less often than annually, with the purpose to ascertain whether market manipulation is occurring. The results of these internal audits will be reduced to writing and submitted to the General Manager. The General Manager shall preserve the audit reports for a period of no less than five years. If there is probable cause to believe that market manipulation has occurred, such finding will be immediately reported to the General Manager for investigation and possible corrective action. The General Manager shall be responsible for reporting the results of such investigation(s) as set forth below.

Any employee who suspects market manipulation is occurring shall report such suspicions to the Manager of Internal Audit, the General Counsel, or through the employee hotline. The Manager of Internal Audit or General Counsel shall reduce any and all reported suspicions to writing. If there is probable cause to believe that market manipulation has occurred, such finding will be immediately reported to the General Manager for investigation and possible corrective action. The General Manager shall be responsible for reporting the results of such investigation(s) as set forth below. To the extent possible, the identity of the employee making such report shall be held in confidence during any ensuing investigation. Subsequent to the conclusion of the investigation, the identity of the reporting employee shall remain confidential, unless the General Manager specifically determines it is contrary to Platte River's or the employee's best interest to do so.

Employees that report suspected instances of market manipulation shall be protected under the "Whistle-Blower" provisions of the Platte River Power Authority Employee Handbook.

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If instances of market manipulation by Platte River employees are identified by the General Manager following an investigation, such instances shall be immediately reported to the Platte River Board of Directors and to the Federal Energy Regulatory Commission. Platte River Power Authority employees shall fully cooperate with any investigation that may be undertaken by the Federal Energy Regulatory Commission.

Implementing Parties and Assigned Responsibilities:

The Manager of Generation Dispatch and Power Markets will develop a training program for Platte River employees on the subject of market manipulation. The Internal Auditor shall audit the activities of employees engaged in purchase and sale of electric energy and transmission services.

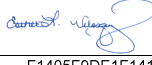

Associated Items (if applicable):

Board Resolution No. 12-18.
Federal Power Act, Section 222.
C.F.R. Title 18, Part 1c.2.

Definitions (if applicable):

NA

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Version	Date	Action	Author	Change Tracking (new, review, revision)
1.0	08/24/2006	Original Policy Board Resolution 05-13	Joe Wilson	New
2.0	02/28/2013	Appropriate responsibilities updated	Joe Wilson / Deb Schaneman	Revision
3.0	05/31/2018	Reviewed and put on new form, Resolution 12-18	Esther Velasquez	Revision and new form
3.1	08/26/2019	Word added to provide clarity	Esther Velasquez	Revision