Northern Natural Gas	**NORTHERN NATURAL GAS COMPANY'S WRITTEN PROCEDURES IMPLEMENTING THE STANDARDS OF CONDUCT FOR TRANSMISSION PROVIDERS PURSUANT TO 18 CFR PART 358 ORDER NO. 717[1]**	Revision Date: 02/09/2026 Last Reviewed Date: 02/09/2026

Northern Natural Gas Company (Northern) is a wholly-owned subsidiary of Berkshire Hathaway Energy Company (BHEC). Northern is an interstate natural gas pipeline that transports gas for others pursuant to subpart B and G of part 284 and as such is subject to the Federal Energy Regulatory Commission's (Commission) jurisdiction. Northern is a transmission provider as defined in Section 18 C.F.R. § 358.3(k) of the Standards of Conduct for Transmission Providers ("Standards" or "Standards of Conduct"). Northern does not engage in marketing functions as defined in Section 358.3(c)(2) and, therefore, does not employ marketing function employees. "Marketing function employee" and "Northern's marketing function employees" throughout these written procedures will refer to marketing function employees of affiliates of Northern. BHEC does not conduct transmission transactions in U.S. energy markets.

Pursuant to Sections 358.7(d) and 358.8(b)(2), Northern is required to post these written procedures to its Internet website ("website") and distribute them to its transmission function employees, marketing function employees, officers, directors, supervisory employees, and other employees likely to become privy to non-public transmission function information. Northern distributes these procedures by posting them on its website and referencing the posting in its training.

[1] As revised or amended from time to time

IMPLEMENTATION PLAN

§ 358.2 General principles.

As provided in this written plan, Northern has taken steps to ensure that its transmission function employees function independently from marketing function employees. Furthermore, Northern has taken steps to ensure that it treats all transmission customers, affiliated and nonaffiliated, on a non-discriminatory basis and does not make or grant any undue preference or advantage to any transmission customers. Northern's employees will not disclose, or use a conduit to disclose, non-public transmission function information to marketing function employees. Northern will provide equal access to non-public transmission function information to all its customers except as allowed under the Standards.

§ 358.4 Non-discrimination requirements.

Northern will strictly enforce all tariff provisions relating to the sale or purchase of open access transmission service, if its tariff provisions do not permit the use of discretion. Northern will apply 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 non-discriminatory manner, if there is discretion in the application of such provisions. Northern will not, through its tariffs or otherwise, give undue preference to any customers 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), and will process all similar requests for transmission service in the same manner and within the same period of time.

§ 358.5 Independent functioning rule.

(a) General rule.

Northern has examined its business operations and has determined that its transmission function employees function independently from its marketing function employees. Northern does not make sales for resale of natural gas[2] and therefore does not employ any marketing function employees, nor does it share employee-staffed facilities with any marketing function employees. Northern's transmission function employees have been trained on the Standards of Conduct requirements, including the requirement that transmission function employees must function independently from marketing function employees.

(b) Separation of functions.

As previously stated, Northern does not make sales for resale of natural gas and therefore does not employ any marketing function employees, nor do any of Northern's transmission function employees conduct marketing functions. Also, as previously stated, Northern's transmission function employees do not share facilities with marketing function employees. Marketing function employees who visit Northern's headquarters sign in and are provided a visitor badge in the lobby, are escorted by a Northern employee while in the building, and have limited access to the building. Marketing function employees do not have access to any systems or facilities used for transmission operations that other transmission customers do not have. Northern's Human Resources and IT Departments are responsible for informing the Chief Compliance Officer ("CCO") of any changes to the status of shared employee-staffed facilities.

[2] with the exception of purchases and sales for operational purposes

To ensure compliance with this regulation, Northern's employees and marketing function employees receive annual training.[3] Northern's transmission function employees review Standards of Conduct requirements quarterly. In addition, Northern posts these written procedures on its website and provides additional Standards of Conduct information to employees on an intranet site.

§ 358.6 No conduit rule.

Northern's employees and its contractors, consultants, agents and affiliates' employees likely to become privy to non-public transmission function information have been informed that they are prohibited from disclosing, or using anyone as a conduit for the disclosure of, non-public transmission function information to marketing function employees. To ensure compliance with the No Conduit rule, Northern's employees (including contractors, consultants and agents likely to become privy to non-public transmission function information) receive training and are provided electronic copies of these written procedures. Employees of affiliates of Northern likely to become privy to non-public transmission function information receive training from their employers. Northern's management employees are assigned specific Standards of Conduct regulation responsibilities related to the No Conduit rule and review those regulations at least quarterly. Northern's transmission function employees review the No Conduit rule requirements at least quarterly.

[3] Northern has identified certain marketing function employees at CIMA Energy, LP, MidAmerican Energy Company, MIECO LLC, Occidental Petroleum Corp. and Pacific Summit Energy LLC affiliated companies that conduct transmission transactions with Northern. These marketing function employees receive training from their employers.

§ 358.7 Transparency rule.

To ensure compliance with the Transparency rule requirements, employees receive training and are provided electronic copies of these written procedures. Northern's management employees and other employees with specific responsibilities related to the Transparency rule review the Transparency rule requirements at least quarterly.

(a) Contemporaneous Disclosure.

If a Northern employee discloses information in a manner contrary to the requirements of Section 358.6, other than critical energy infrastructure information (CEII), non-public transmission customer information, or other information subject to limited dissemination, Northern will immediately post such information on its website. If a Northern employee discloses such information subject to limited dissemination, Northern will immediately post notice on its website that such information was disclosed. Northern's annual training includes information regarding prohibited disclosures and that such disclosures are to be reported to the CCO immediately.

(b) Exclusion for specific transaction information.

Northern's transmission function employees may discuss specific requests for transmission service with marketing function employees. Northern is not required to contemporaneously disclose such information.

(c) Voluntary Consent Provision.

A customer of Northern may voluntarily consent, in writing, to allow Northern to share that customer's non-public information with a marketing function employee. Northern will post on its website notice of the consent with a statement that it did not provide any preferences, either operational or rate-related, in exchange for the voluntary consent.

(d) Posting written procedures.

These implementation procedures are posted in the Informational Postings section of its website under the heading Standards of Conduct/Implementation Procedures.

(e) Identification of Affiliate Information.

(1) Northern has posted in the Informational Postings section of its website, under the heading Standards of Conduct/Affiliate Names & Addresses, the names and addresses of its affiliates that employ or retain marketing function employees. The Corporate Secretary of BHEC will notify Northern's CCO when a new affiliate that engages in transmission transactions is created, at which time the CCO will determine whether the new affiliate has marketing function employees. Names and addresses of new affiliates that have marketing function employees will be posted within seven business days of the change.

(2) As stated previously, Northern does not share employee-staffed facilities with any marketing function employees.

(3) The BHEC Corporate Secretary is responsible for informing Northern of potential merger partners. If Northern determines the potential merger partner may employ or retain marketing function employees, Northern will post information concerning the

potential merger partner within seven days after the potential merger is announced. This information will be posted under the heading Standards of Conduct/Potential Mergers.

(f) Identification of Employee Information

(1) Northern has posted the job titles and job descriptions of its transmission function employees on its website under Standards of Conduct/Job Titles & Descriptions. Northern's Human Resources (HR) department has been assigned responsibility for maintaining and updating changes as they occur in this area and will keep the CCO informed of any such changes. Changes to job titles and descriptions of transmission function employees will be posted on the website within seven business days of any change.

(2) In the event a transmission function employee transfers to a position as a marketing function employee or vice versa, a notice of such transfer will be posted to Northern's website under Standards of Conduct/Employee Transfers and will remain posted for 90 days. Information posted will include the employee's name, the employee's respective titles held while performing each function, and the effective date of the transfer. When a transmission function employee transfers to a position as a marketing function employee or vice versa, HR will complete a form that contains the name of the transferring employee, the respective titles held by the transferring employee and the effective date of the transfer and will provide the information to the website coordinator for posting. An employee transferring from a marketing function employee position to a transmission function employee position at Northern will be required to complete Standards of Conduct training for transmission function employees and certify that s/he no longer has access to the facilities or systems of his/her former employer and will not be a conduit for sharing

transmission function information with a marketing function employee. When a transmission function employee transfers to a marketing function employee position, the employee will be required to review a specific Standards of Conduct training presentation for his/her new position as a marketing function employee. HR has been assigned responsibility for employee transfer requirements and reviews such requirements at least quarterly.

(g) Timing and General Requirements of Postings.

(1) Unless a shorter timeframe is set out in the regulations, Northern will update as applicable the information listed in Section 358.7 within seven business days of any change and post the date on which the information was updated. Northern's website postings will be sufficiently prominent as to be readily accessible.

(2) In emergency situations affecting normal business operations, Northern may suspend the posting requirements. If the disruption lasts longer than one month, Northern will notify the Commission and may seek a further exemption from the posting requirements.

(h) Exclusion for and recordation of certain information exchanges.

If it becomes necessary for Northern to provide marketing function employees with non-public transmission function information necessary to maintain or restore operation of Northern's system, Northern will make and retain a contemporaneous record of such information exchange, including the names of the transmission function employee(s) and marketing function employee(s) involved, the date, and a summary of the information provided to the marketing function employee(s). Contemporaneous records will be made

of the communication, except in cases of emergency, when recordation will be made as soon after the fact as practicable. Northern will retain such records for five years.

(i) Posting of waivers.

Northern will post on its website notice of each waiver of a tariff provision it grants in favor of an affiliate, unless such waiver has been approved by the Commission. Northern will also maintain a written log of such acts of waiver, available to the Commission upon request. The information contained in this log will be posted on Northern's website within one business day of the act of a waiver. Northern's written log and records of such postings will be kept for five years from the date of each act of waiver.

§ 358.8 Implementation requirements.

(a) Effective date.

Northern is in full compliance with 18 CFR 358. The initial training and posting requirements under Order No. 717 were completed prior to January 30, 2009.

(b) Compliance measures and written procedures.

Northern has implemented measures, described in these procedures, to ensure that the requirements of the Independent Functioning rule and the No Conduit rule are observed by its employees and the employees of its affiliates that are engaged in marketing functions. Northern has distributed electronic copies of these written procedures to its transmission function employees, marketing function employees, officers, directors, supervisory employees, and other employees likely to become privy to non-public transmission function information. Employees of affiliates engaged in marketing functions receive Standards of Conduct training from their employers.

(c) Training and compliance personnel.

(1) Training - Northern provides annual training to all of its employees, who certify, either electronically or in writing, that s/he completed the training. Northern's marketing function employees receive annual Standards of Conduct training from their employers and also receive initial training from Northern on specific marketing function employee requirements when they become marketing function employees. Employees of affiliates likely to become privy to non-public transmission function information receive Standards of Conduct training from their employers as well. HR ensures that new Northern employees receive training within the first 30 days of their employment.

(2) Chief Compliance Officer - Northern has designated Ryan Coufal as its Chief Compliance Officer. Mr. Coufal is responsible for employee training, answering employee questions, and coordinating audits and investigations with Commission staff, as well as ensuring that Northern complies with the Standards of Conduct. Mr. Coufal can be reached at 402-398-7550 or at Ryan.Coufal@nngco.com. Prohibited disclosures and other possible violations are to be directed to Mr. Coufal's attention immediately. Contact information regarding Northern's CCO is available both on Northern's website under the heading Standards of Conduct/Chief Compliance Officer and on Northern's intranet.

(d) Books and records.

Northern ensures that it maintains its books of account and records (as prescribed under 18 C.F.R. parts 201 and 225) separately from those of its affiliates with marketing function employees. Northern's books are available for Commission inspection. The responsibility for maintaining Northern's books of account and records as required by the Standards of Conduct has been assigned to Northern's Vice President, Finance.