

Mary Yang

Counsel

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Mary has extensive experience advising on Regional Transmission Owners and Independent System Operators markets, transmission reform, and ratemaking matters for the Federal Energy Regulatory Commission (FERC). Most recently, she served as a Legal Advisor to a FERC Commissioner, where she guided initiatives such as Order No. 1920 (regional transmission planning) and Order No. 2023 (generator interconnection), and generic proceedings involving transmission cost management, grid-enhancing technologies, and interregional transmission reform. In addition, Mary advised on market design and ratemaking cases under the Federal Power Act (FPA) and acted as the Commissioner's liaison for Congressional and public affairs.

Following her time at FERC, Mary was detailed to the Department of Energy's (DOE) Office of the General Counsel. There, she advised DOE leadership on FERC policies and helped implement grant and research programs under the Inflation Reduction Act and the Infrastructure Investment and Jobs Act. Earlier in her career, Mary served as a Trial Attorney in FERC's Office of Administrative Litigation. She litigated and negotiated cases involving electric, gas, and oil rate applications, including matters related to the rate of return on equity (ROE) for electric utilities and contested settlements for natural gas pipeline cost-of-service rates. Her expertise spans key ratemaking concepts such as tax normalization for Master Limited Partnership pipelines, depreciation of capital assets, ROE, utility accounting, and reactive power. Mary's deep understanding of energy law and policy enables her to navigate complex regulatory frameworks and deliver impactful results for her clients.

SERVICES

Electric Energy Regulation

Natural Gas Pipelines

Oil Pipelines

EXPERIENCE

Advised Commissioner on legal and policy matters in Order Nos. 2023 and 1920, and prepared the Commissioner for meetings of the Joint Federal-State Task Force on Electric Transmission.

Advised Commissioner on various generic proceedings, including interregional transmission reform, reactive power, dynamic line ratings and grid-enhancing technologies, inverter-based resources, natural gas policy indices, and drafted natural gas policy and greenhouse gas policy statements.

Advised Commissioner on range of contested proceedings, including applications and complaints under the Natural Gas Act (NGA) and FPA. Select examples include: compliance orders in response to Order No. 2222, Accumulated Deferred Income Taxes/Excess Deferred Income Taxes issues in litigated natural gas pipeline rate cases, resource adequacy and capacity accreditation filings, cases addressing retroactive ratemaking and filed rate doctrine, cost allocation and affected systems disputes, contested enforcement proceedings, and electric, oil, and gas ratemaking proceedings.

Led development of technical conferences on topics such as grid reliability, Environmental Protection Agency rules, and transmission cost management and oversight.

Managed Commissioner's Congressional portfolio by preparing for Congressional hearings, drafting written testimony, responding to Member inquiry letters, and responding to questions for the record.

Litigated oil market-based rate applications for affiliated oil pipelines in the Gulf Coast, successfully advocating for positions ultimately adopted by the Administrative Law Judge and FERC.

Litigated Seven Factor Test dispute about transmission versus distribution facilities in Midcontinent Independent System Operator, Inc., successfully advocating for positions ultimately adopted by the Administrative Law Judge and FERC.

Litigated rate of ROE for long-standing dispute involving an abandoned plant facility through paper hearing procedures, culminating in a settlement.

Secured numerous settlements in cases involving NGA sections 4 and 5 applications, fuel trackers, reactive power rate schedules, depreciation rates, rate design, formula rates, and ROE. Select settlements include: (1) a novel rate case involving wholesale distribution charging services for battery storage; (2) an FPA case seeking transition of a Western utility from stated rates to formula rates; and (3) an FPA case involving reserve levels for variable energy resources.

ADMISSIONS

District of Columbia

EDUCATION

Columbia Law School, J.D. (2016)

Brown University, B.A. (2013)

PROFESSIONAL ACTIVITIES

Energy Bar Association, Energy Law Journal (International Articles Editor)

Energy Bar Association, Young Lawyers Council (Chair)

HONORS/DISTINCTIONS

2024 Rising Star, *Energy Bar Association* (2024)

2023 Rising Star, *Women's Energy Summit & Rising Star Forum* (2023)

SPEAKING ENGAGEMENTS

Panelist, *Illinois Power Hour* (2024)

Panelist, International Partnering Forum, *Oceantic Network* (2024)

Panelist, 7th Annual Conference on Offshore Wind Transmission, *Global Transmission Report* (2023)

Speaker, International Regulators Futures Forum, *Columbia Law School* (2023)

Guest Speaker, Transmission Policy Task Force Meeting, *Edison Electric Institute* (2023)

Guest Speaker, Electricity Steering Committee Meeting, *Energy Bar Association* (2023)

Panelist, Winds of Change, *Duke University* (2023)