

## Mary Yang

Counsel

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Mary has extensive experience advising Regional Transmission Organizations (RTOs) and Independent System Operators (ISOs) on capacity markets, transmission reform, interconnection, and ratemaking matters before the Federal Energy Regulatory Commission (FERC). She specializes in advising clients on rulemaking proceedings, section 205 tariff filings, and section 206 complaints under the Federal Power Act (FPA).

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. Mary also advised on market design and ratemaking cases under the 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 settlements for electric, gas, and oil rate matters, including rate of return on equity (ROE) for electric utilities. Her expertise spans key ratemaking concepts such as tax normalization, depreciation, ROE, utility accounting, and reactive power. Mary's deep understanding of energy law and policy enables her to solve complex regulatory problems for her clients.

## SERVICES

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Electric Energy Regulation

Natural Gas Pipelines

Oil Pipelines

## EXPERIENCE

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Advised an RTO and transmission owners in FERC proceedings addressing complex and novel issues involving interconnection and cost responsibilities of data centers and other large loads.

Advised transmission owner client about possible new tariff schedule addressing needs of large loads.

Submitted a section 205 filing on behalf of an RTO to comply with FERC Order No. 1920's new requirements on regional transmission planning reform.

Led preparation of a section 205 filing to change an RTO's capacity market rules to allow for broader demand response participation.

Drafted a brief to the Supreme Court of the United States in support of a petition for certiorari involving the applicability of rate of return on equity incentive adders in states with statutory mandates to join RTOs.

Advised an RTO and various transmission owners in responding to an FPA section 206 complaint about the scope of local transmission planning in two different planning regions.

Advised an RTO in responding to several FPA section 206 complaints involving interconnection disputes.

Advised clients about cost recovery and cost allocations procedures under FPA section 202(c) before FERC and the Department of Energy.

Advised clients about RTO and ISO capacity market rules, including about resource adequacy and capacity performance standards, balancing ratios, stop loss methodologies, and more.

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

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District of Columbia

Supreme Court of the United States

## EDUCATION

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Columbia Law School, J.D. (2016)

Brown University, B.A. (2013)

## PROFESSIONAL ACTIVITIES

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Energy Bar Association, Energy Law Journal Editorial Board (Administrative Editor)

Women's Council On Energy & The Environment

## HONORS/DISTINCTIONS

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

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

## SPEAKING ENGAGEMENTS

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Panelist, Actionable Steps to Evaluate Your Leadership Roles, EmpowHER, *American Clean Power Association* (2025)

Speaker, [Special Institute on Siting Renewable Energy Projects and Transmission Infrastructure](#), *The Foundation for Natural Resources and Energy Law (FNREL)* (2025)

Panelist, *Illinois Power Hour* (2024)

Panelist, International Partnering Forum, *Oceanic 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)