



## Gregory T. Simmons

### Partner

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Gregory T. Simmons is a partner in the firm's Energy, Renewables and Utilities department.

Greg's practice focuses on the highly regulated field of energy and utilities, including regulation of energy in interstate commerce under jurisdiction of the Federal Energy Regulatory Commission (FERC) and other administrative agencies, as well as retail distribution.

Greg has represented and advised natural gas local distribution companies (LDCs), electric distribution companies (EDCs), electric generators, and natural gas storage providers, among others.

Regularly appearing in FERC administrative proceedings and negotiated settlements, Greg has represented LDCs as they face increasing rates on interstate natural gas pipeline, expensive infrastructure modernization, increasingly constrained interstate natural gas transportation, and increasing regulatory pressures to reduce greenhouse gas emissions. Greg has handled a wide variety of proceedings including general base rate cases, limited Natural Gas Act Section 4 cases (e.g. fuel, imbalance, reservation charge crediting, and other tariff modifications), and market-based rate applications.

In addition to working with retail distributors and other end-users in their day-to-day gas transportation needs and problems, Greg has advised on long-term strategies, cutting-edge jurisdictional questions for renewable development, liquefied natural gas (LNG) transportation, and settlements under the Federal Power Act. Greg has also helped retail LDCs maintain and update their FERC regulated certificates necessary for transportation of gas in interstate commerce, and participate in interstate natural gas project certificate and rulemaking proceedings.

Greg seeks to ensure his clients achieve their goals and the greatest value provided under the laws and regulations. Greg has helped clients achieve their cost-containment and service reliability goals, energy purchase and sales transactions, safety regulatory requirements, and many other successes in this dynamic industry.

Greg's legal career began as a law clerk for the Hon. Thomas F. Stansfield at the Circuit Court for Carroll County, Maryland. He next accepted a position as an Assistant People's Counsel with the Maryland Office of People's Counsel – a statutory consumer advocate for utility customers in Maryland – where his experience as an advocate in the energy sector began. With his only focus being the regulation of retail utility companies, Greg gained extensive experience with utility rate cases before the Maryland Public Service Commission. There, Greg also worked intimately with energy efficiency and smart grid/smart meter programs, and briefed and argued utility case appeals in state courts.

The energy industry continues to develop and modernize, and those who must navigate federal regulation of energy transportation are facing changing service profiles and challenges as the energy supply mix and national economies undergo constant change. In this environment, Greg's experience and passion for the subject has been invaluable to his clients.

**Areas of Concentration:**

- Interstate pipeline rate review and settlements
- Interstate pipeline operational issues and settlements
- Interstate pipeline tariff review and dispute counseling
- Pipeline compliance with North American Energy Standards Board (NAESB) standards (wholesale gas quadrant)
- Jurisdictional review
- State and federal regulatory approvals for merger and acquisition activity
- State rate review and settlements
- State-level regulation of LDC and EDC activities

## Practices

- Energy, Renewables and Utilities
- Energy and Utilities Litigation
- Utility Rate Cases
- Utility Regulatory and Compliance
- Natural Gas

## Industries

- Energy and Utilities

## Bar Admissions

- District of Columbia
- Maryland

- U.S. Court of Appeals for the District of Columbia Circuit

## Education

- J.D., University of Maryland School of Law, 2011
- B.A., Journalism, University of Maryland, College Park, 2000
- B.A., Economics, University of Maryland, College Park, 2000

## Representative Experience

- Represented LDC client in multiple interstate pipeline rate cases and rate settlements.
- Successfully advocated for tariff modifications to reservation charge crediting provisions on multiple interstate pipelines.
- Advised electric generator on day-ahead NAESB wholesale gas quadrant communications.
- Represented LDC client in interstate natural gas pipeline fuel cost recovery settlement, achieving greater cost certainty for client.
- Managed Hinshaw/LDC natural gas transportation rate filings for LDC clients pursuant to Part 284 of FERC's regulations.
- In settlement involving interstate natural gas pipeline cost recovery for polychlorinated biphenyl (PCB) remediation, represented LDC client to retain long-term cost protections for client.
- Developed legal arguments to overcome a city's threat to impede commencement of service by natural gas project certificated pursuant to Section 7 of the Natural Gas Act, ensuring timely delivery of gas to the LDC client.
- Represented group of LDC clients in rate settlement involving Liquefied Natural Gas storage and transportation system, achieving rate reductions and improvements to operational provisions in pipeline's tariff.

- Developed regulatory and legal framework for major utility asset transfer petition.
- Assisted in rate case development and litigation on behalf of LDC clients in state administrative proceedings.

## Professional and Community Activities

- Energy Law Journal, Student Notes Editor, July 2018 - present