

**CONTACT**

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**PRACTICES**

Electric  
Land Use  
Renewable Energy

**EDUCATION**

Seattle University School of Law  
University of Washington

**BAR AND COURT ADMISSIONS**

Oregon State Bar  
Washington State Bar

**CHRIS D. ZENTZ**  
OF COUNSEL



**Professional Background**

Chris has a wide-ranging electric practice that includes regular involvement in both regulatory proceedings and transactions. Chris provides counsel on transactions, due diligence, and corporate transaction authorizations under Section 203 of the Federal Power Act; rate and tariff filings under Section 205 of the Federal Power Act; market-based rate authorizations; and compliance with the Public Utility Regulatory Policies Act.

He also works on transmission and ancillary service rate cases, Open Access Transmission Tariff compliance, the FERC Standards of Conduct, interlocking directorate issues, and transmission planning. His experience includes renewable resource development along with the negotiation of transactions involving power, transmission, and storage resources. Chris represents energy industry clients before the Federal Energy Regulatory Commission, the Bonneville Power Administration, and state and local regulators.

**Representative Experience**

**Transactional Work**

- Represents independent power producers, electric power marketers, utilities, and investors in power projects in transactional and regulatory matters involving the Federal Power Act, including by obtaining approvals under FPA Section 203 and completing post-closing regulatory obligations.
- Represents purchasers and sellers in the negotiation of deal documents and power purchase and sale, electric storage, transmission service, and interconnection agreements.
- Represented two large, institutional investors in renewable generation facilities in obtaining requisite FERC approvals and authorizations to acquire interests in over \$2 billion worth of energy assets.
- Counseled a large, independently-owned utility through obtaining FERC approval for two acquisitions of combined cycle gas generation facilities from unaffiliated third parties.
- Experience working with the Western Systems Power Pool Agreement, EEI Master Services Agreement, and custom agreements.
- Represented large public utility in several solar acquisition deals, which included asset purchase agreement negotiation and drafting, preparation of document schedules and ancillary agreements, and oversight of due diligence process.
- Served as project lead on behalf of an international utility and project developer in acquiring a large, pumped storage hydropower generation project, which representation included negotiating and drafting of transaction documents, due diligence, environmental review, and obtaining regulatory approvals.
- Counseled an independently-owned utility on a transaction involving an asset swap and tax deferred exchange of transmission assets and capacity, which included drafting and negotiating documents, obtaining regulatory approvals, drafting ancillary agreements, and researching various, transaction-specific issues.

**Regulatory Work**

- Represents utilities and energy companies in various Federal and State regulatory matters involving transactions, rate cases, OATT issues and compliance, negotiation of transmission and interconnection

agreements, market-based rates, standards of conduct, interlocking director rules, electronic quarterly reporting, FERC accounting rules, audits, and other compliance matters.

- Represented several utility and developer clients on obtaining various transactional and market-based rate approvals, including approvals of a wind energy acquisition, obtaining market-based rate authority, filing of triennial market power updates, and preparing post-transaction regulatory filings.
- Regularly negotiates agreements for transmission service, generator interconnection, transmission-to-transmission interconnection, ancillary services, balancing authority areas, and dynamic transfers.
- Counseled international utility and project developer through all matters for the startup of a new business—namely, formation of an unprecedented generation-only balancing area, which representation included strategic advice on regulatory issues, obtaining regulatory approvals, and advising on compliance matters.
- Represents several of the initial California Independent System Operator Corporation EIM Entities on all stages of start-up and compliance, including drafting regulatory filings and documents; providing advice regarding compliance obligations; preparing OATT revisions, business practice manuals, and other internal compliance manuals; and staying abreast of changes in the EIM market structure.
- Represented a coalition of large, independently-owned utilities throughout the FERC Order No. 1000 Regional Transmission Planning and Cost Allocation compliance process.
- Regularly participates in various state integrated resource plan proceedings on behalf of an international utility and project developer, including drafting and filing comments, reviewing and commenting on various filings, and attending state utility commission proceedings.
- Represented one of the largest, independently-owned utilities on all matters of regulatory compliance before the FERC and various state utility commissions, including in administrative hearings and informal disputes with a federal power marketing agency, and on regulatory compliance issues.
- Advised a large, independently-owned utility on preparation and filing of an ancillary services rate case with FERC to update rate schedules, which included providing assistance and representation throughout the FERC hearing process.
- Represented a large, independently-owned utility in defending a complaint brought by the Bonneville Power Administration before FERC regarding interpretation of the OATT and legacy contracts, rollover rights upon termination of grandfathered transmission agreements, and load service under pre-Order No. 888 agreements.
- Represented a large, independently-owned Northwest utility in connection with a FERC audit and with OATT compliance matters.