HUSCH BLACKWELL



Linda L. Walsh

PARTNER

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OVERVIEW

Linda focuses on regulatory issues affecting the electric utility industry nationwide.

Linda counsels and advocates for clients on a broad range of federal regulations covering electric utilities. Her experience representing utilities before FERC informs strategies for clients developing new business opportunities, handling compliance matters or faced with litigation. Linda advises on regulatory issues in connection with:

- Transmission rate proceedings
- Order No. 1000 transmission planning and development
- Section 203 acquisitions and dispositions
- Centralized service company requirements
- Standards of conduct issues
- Merchant generation interconnection issues
- Market-based rate applications
- Qualifying Facility (QF) certifications
- Utility reporting requirements

"Linda has deep knowledge of the electric regulatory landscape."

— Chambers USA 2024

Industry

Energy & Natural Resources

Services

Data Centers
Electric Transmission
Energy Regulation
Hydrogen
Litigation & Alternative Dispute Resolution
Project Finance

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- Interlocking director applications
- Public Utility Holding Company Act (PUHCA) requirements

Linda also prepares transmission rate filings under the Federal Power Act (FPA) to establish forward-looking formula-based rate and incentive-rate treatments favorable to clients. She guides clients through North American Electric Reliability Corporation (NERC) matters, as well as interconnection and regulatory issues underlying corporate and financial transactions in the energy sector. She provides policy advice on issues covered by the Public Utility Regulatory Policies Act (PURPA), net metering and the reliability results of environmental regulations.

Experience

TRANSMISSION

- Represented cooperative utilities before FERC on tariff interpretation for network transmission service and generator interconnection. Prepared waiver requests, rehearing petitions, Section 206 complaints and developed appellate strategies. Specialized in Network Integration Transmission service agreements, settlement negotiations and power supply options.
- Represented merchant transmission developers in obtaining FERC negotiated rate authority and provides regulatory strategy for transmission development, including affiliate participation in open solicitation processes. Advised on battery storage as transmission assets, cost recovery mechanisms and rate structures. Prepared FERC applications and reviews precedent agreements.
- Prepared FERC Section 206 complaints to amend RTO tariff provisions regarding transmission upgrade O&M cost collection from interconnection customers. Drafted filings and supporting affidavits, coordinated with industry partners, reviewed compliance tariff changes and engaged in stakeholder discussions to ensure effective representation during implementation.
- Conducted comprehensive research and analysis on regional transmission planning under FERC Order No. 1920 across all RTO and non-RTO regions. Developed compliance strategies, recommended action items and summary reports for regulatory advocacy. Provided actionable recommendations reflecting current regulatory developments and client priorities.

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Experience

- Supported client participation in regulatory proceedings within PJM, SPP and MISO, including AI applications in interconnection processes, milestone change filings, waiver requests and JTIQ proceedings. Prepared FERC Interconnection Workshop comments and analyzes fiber optics in network upgrade costs, readiness deposit requirements and data center co-location issues.
- Conducted due diligence reviews of merchant transmission projects, analyzing subscriber agreements, cost and capacity allocation risks and related FERC regulatory implications.
- Provides analysis and advice in RTO and non-RTO regions regarding transmission rate development, incentive rate requests, cost allocation, Order No. 1000 planning requirements.
- Provides strategic analysis for merchant transmission developers; obtained negotiated rate authority and approval of initial capacity allocation process.

GENERATION

- Provided analysis of federal and state requirements for data center co-location with existing generation facilities, focusing on FERC regulatory requirements for interconnection, shared facilities arrangements and maintaining EWG status under PUHCA.
- Secures Section 205 market-based rate authority and assists with related FERC compliance filings, including notice of change in status filings, electronic quarterly reporting, relational database reporting and triennial market power analyses.
- Obtains project Exempt Wholesale Generator (EWG) status and advises on related Public Utility Holding Company (PUHCA) issues.
- Obtained Qualified Facility (QF) status for dozens of project companies and advises on all Public Utility Regulatory Policies Act (PURPA) requirements.
- Advises on FERC Section 203 requirements for the sale or acquisition of jurisdictional facilities; has prepared Section 203 filings for FERC approval for many generation and transmission transactions.

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Experience

- Provides strategic guidance regarding generator interconnection procedures, transmission tariff developments, NERC requirements and FERC policy initiatives that affect development of generation both within and outside of RTO/ISO regions.

TRANSACTION SUPPORT

- Represented Swift Current Energy as project development counsel in the multi-year development and sale of the Steel River solar and storage project to Cypress Creek Renewables.
- Provides regulatory review and comments to transaction documents; performed federal and state regulatory due diligence in multiple renewable energy transactions. Proficient in Federal Power Act, PUHCA and PURPA issues and related FERC regulations.
- Assessed project risks of Generator Interconnection Agreements and procedures, Shared Facilities Agreements, Cost Sharing Agreements and Transmission Service Agreements.
- Analyzes passive nature of tax equity investor interests in project companies as relevant to required FERC approvals and disclosures.
- Work with developers to respond to diligence requests for projects both within and outside of RTO/ISO regions across the United States.

NERC/RELIABILITY

- Represented clients in matters involving the development of, and compliance with, NERC's mandatory electric reliability standards.
- Advised clients in confidential NERC audits and compliance violation investigations.
- Represented clients in Compliance Registry disputes, standards compliance, penalty liability, hearing and audit issues, and monitoring the development of NERC and Regional Entity compliance and enforcement programs.

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Experience

COMPLIANCE AND ENFORCEMENT

- Advise clients on FERC compliance and enforcement matters, including operational audits, nonpublic investigations, and self-reports.
- Provide guidance on FERC's enforcement and compliance policy statements and assist regulated companies to develop, implement and defend comprehensive internal FERC compliance programs.
- Represented clients in the development of corporate governance programs designed to adequately identify, and support compliance with applicable FERC regulatory obligations.

STRATEGIC PLANNING

- Advised clients in matters pending before Congress related to energy and environmental policy, including EPA's Clean Power Plan, PURPA reform, baseload generation cost recovery issues, grid reliability, integration of distributed generation and net metering policies.
- Provide advice on FERC rulemakings and other policy initiatives involving transmission, generation and procedural issues.
- Provided FERC regulatory advice for corporate reorganizations and guidance on centralized service company requirements.

LITIGATION

- Extensive experience in FERC hearing and settlement proceedings; managing large discovery processes, witness preparation, development of testimony, depositions, witness examination at hearing, pre- and post-hearing briefing.
- Recently managed two virtual hearings involving multiple witnesses over several weeks.

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Recognition

- *The Best Lawyers in America®*
  - Energy Law, 2016-2027
  - Energy Regulatory Law, 2023, 2024, 2026 and 2027
- *Chambers USA,* Energy: Electricity (Regulatory & Litigation)
  - USA-Nationwide, 2009-2015, 2018-2026
  - Global Guide, USA, 2019-2022, 2025 and 2026
- *The Legal 500 United States*
  - Energy: Energy regulation: electric power, Recommended lawyer, 2023-2026
- *Super Lawyers*, Washington, DC, Energy & Natural Resources Law, 2007-2010, 2013-2020
- Public Utilities Fortnightly, "Top Utility Lawyer," 2011

Education

- J.D., Syracuse University College of Law
  - *cum laude*
- M.A., University of Hartford
  - Economics
- B.A., University of Connecticut

Admissions

- District of Columbia
- Connecticut
- New York

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