

CONTACT

pwm@vnf.com

202.298.3721

PRACTICES

Electric

Oil, Gas, & LNG

EDUCATION

Boston College Law School

Dartmouth College

BAR AND COURT ADMISSIONS

District of Columbia Bar

Massachusetts State Bar

PHIL MONE

PARTNER



Professional Background

Phil Mone represents clients in the natural gas, LNG, and electric utility industries in regulatory matters before the Federal Energy Regulatory Commission (FERC), with a focus on all aspects of ratemaking and regulatory rate litigation before administrative law judges, including assisting companies with the submission of rate filings and advising witnesses preparing testimony.

Phil counsels owners of natural gas pipelines and LNG facilities on rate, tariff, enforcement, and certificate matters, helping them understand and comply with their obligations under energy and environmental laws, particularly the Natural Gas Act (NGA) and the National Environmental Policy Act (NEPA). Phil has far-reaching experience representing clients in rate case litigation under both Section 4 and Section 5 of the NGA. Phil has advised investors on potential equity investments, including potential investment in a major interstate natural gas pipeline proposed to be developed. He is a contributing author of the “AGA FERC Manual: A Guide for Local Distribution Companies,” distributed by the American Gas Association and currently serves as chair of the Energy Bar Association’s Natural Gas Committee.

Phil also represents investor-owned and municipal electric utilities before FERC in a variety of contexts, in particular rate and complaint proceedings under Sections 205 and 206 of the Federal Power Act (FPA). Phil possesses substantial knowledge of cost-of-service rate proceedings, including transmission formula rate cases. Phil also advises investors on equity investments in interstate electric transmission assets regarding implications under Sections 203 and 205 of the FPA.

From 2012-2014, Phil served as a Trial Attorney at the Federal Energy Regulatory Commission representing FERC’s Office of Administrative Litigation at settlement and hearing in administrative litigation cases concerning electric, natural gas, and oil matters. Before that he worked as an associate attorney at a FERC-focused boutique law firm in Washington DC and as in-house counsel at EnerNOC, Inc., a leading provider of demand response services.

Representative Experience

Select Recent Natural Gas and Oil Matters

- Advised a client regarding FERC jurisdiction over gas liquefaction facilities and transport of LNG via waterborne vessel.
- Advised a natural gas pipeline in preparation for a filing under Section 4 of the Natural Gas Act.
- Litigated a case concerning gas pipeline rates in a Commission-initiated investigation pursuant Section 5 of the Natural Gas Act.
- Co-wrote brief in landmark prudence case concerning the Trans-Alaska Pipeline System (TAPS).
- Litigated a customer-initiated complaint pursuant to the Interstate Commerce Act and the Energy Policy Act of 1992 concerning oil pipeline rates.
- Provided legal memoranda and counseling regarding siting of a major interstate gas pipeline.

Select Recent Electric Matters

- Litigated pursuant to a complaint via Section 206 of the Federal Power Act concerning an RTO-wide ROE for electric transmission utilities.
- Drafted and submitted comments for a CAISO market participant regarding FERC’s ISO/RTO Credit

Reform rulemaking (Order 741).

- Drafted and submitted comments on behalf of large wholesale transmission customer in FERC's Notice of Inquiry regarding Order No. 679 Transmission Rate Incentives.
- Researched and authored a guide to electric transmission formula rates; presented guide to an audience of energy attorneys and technical experts.
- Co-wrote brief before the Court of Appeals D.C. Circuit on a utility's appeal of a FERC order.
- Drafted and submitted comments for a CAISO market participant regarding FERC's ISO/RTO Credit Reform rulemaking (Order 741).

Government Service

Federal Energy Regulatory Commission

Office of Administrative Litigation, 2012-2014

Alerts

- FERC Revises Policy for Evaluating Public Utility Return on Equity, 11/25/2019
- FERC Revisiting its ROE Policy for Public Utilities , 03/22/2019
- FERC Revisiting its Policy for ROE Determinations and Seeking Comments , 03/22/2019
- Landmark FERC Order Adopts New Method for ROE Determinations , 10/17/2018
- FERC Announces New Framework for Determining Public Utility ROE, 10/17/2018
- Supreme Court Addresses Limits on State Authority to Promote New Generation Development, 04/21/2016
- FERC Approves Pipeline Modernization Policy Statement, 04/21/2015