



→ William M. Rappolt

Partner

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Bill Rappolt is a partner in the firm's Washington, D.C. office. He is a member of the Energy Industry Team and Real Estate, Land Use and Environmental Practice Group.

Areas of Practice

Bill represents clients in the natural gas, electric and oil/liquids industries in commercial transactions and before federal agencies, including the Federal Energy Regulatory Commission (FERC), state utility commissions and appellate courts. Bill often represents natural gas pipelines and storage providers, electric generators, power marketing and trading companies, commercial class electric customers, electric utilities, independent electric transmission providers and oil/liquids pipelines and storage providers. He has worked across the renewable energy sector, including on wind, solar and biomass projects, and on electric battery storage projects.

Bill aids clients with rate-making issues involving cost of service, return on equity and rate design. He also advises and represents energy industry participants regarding tariff-related issues, natural gas pipeline certificates, Department of Energy (DOE) export and import authorizations, market-based rate authorizations, compliance with energy market rules and regulations, standards of conduct, interconnection rules and negotiations, and purchases and sales of energy facilities and companies.

Prior to practicing law, Bill was an energy industry analyst in the Federal Energy Regulatory Commission's (FERC) Office of Administrative Litigation. In this role, he worked on numerous natural gas, oil/liquids and electric matters dealing with utilities' rate making issues, interconnection requests and complaints concerning tariff compliance. He was responsible for developing and presenting positions on regulatory issues set for hearing before administrative law judges at FERC.

On a pro bono basis, Bill represents victims of domestic violence seeking Civil Protection Orders and victims of employer based discrimination in violation of Title VII of the Civil Rights Act, the Americans with Disabilities Act (ADA), District of Columbia Human Rights Act (DCHRA) and the District of Columbia Family and Medical Leave Act (DCFMLA).

Honors

Washington, D.C. Rising Star, *Super Lawyers*, 2019-2020

Experience

Representative Matters:

Natural Gas Sector:

- Represented various pipelines in NGA Section 4 and Section 5 proceedings involving rates and terms and conditions of service before FERC.
- Represented natural gas market participants in certificate proceedings before FERC.
- Represented natural gas pipelines in appellate proceedings.
- Advised energy market participants concerning tariff compliance and standards of conduct.
- Represented natural gas storage facilities and a pipeline seeking market based rate authority.
- Counseled clients concerning interconnection.

- Conducted due diligence associated with potential acquisitions of pipeline and storage facilities for major energy companies.
- Provided advice to natural gas market participants regarding FERC jurisdiction and ratemaking.
- Provided advice to natural gas market participants regarding commercial transactions.
- Represented natural gas market participant seeking export and import authorization from the Department of Energy (DOE).

Electric Sector:

- Represented various electric market participants in FPA Section 205 and Section 206 proceedings involving rates and terms and conditions of service before FERC.
- Represented various electric market participants in complaint proceedings before FERC.
- Represented electric market participants in regulatory proceedings involving rates and terms and conditions of service before various state regulatory entities.
- Represented electric market participants in appellate proceedings.
- Provided advice concerning compliance with tariff provisions and standards of conduct.
- Provided advice concerning, and negotiated, interconnection and transmission agreements.
- Represented energy industry participants in investigations concerning allegations of the exercise of market power and price manipulation by industry participants.
- Represented electric market participant seeking export and import authorization from the Department of Energy (DOE).

Oil/Liquids Sector:

- Provided advice to Oil/Liquids market participants regarding FERC jurisdiction and ratemaking.

Articles

- Facing Policy Shifts, Oil And Gas Cos. Need Depreciation Help
Law360, 10.16.2020

- FERC's New Return On Equity Formulas Are Out Of Sync
Law360, 06.03.2020
- FERC Energy Capacity Orders Invite Lawsuits, Uncertainty
Law360, 04.27.2020
- Walking the Path of Utilities' Ownership of Wind and Solar
Tax Notes Federal, 03.16.2020
- Considering Blockchain In The Electricity Industry
Law360, 11.07.2018

Energy Law Blog

- "FERC Issues Second NOI Concerning Its Certificate Policy," February 22, 2021
- "Six Key Items to be Aware of Today Concerning FERC Carbon Pricing Policy," February 2, 2021
- "FERC Seeks Further Comment Regarding Pipelines Initiating Construction While Rehearing is Pending," January 27, 2021
- "FERC Considers Whether to Modify Accounting System for Renewables," January 26, 2021
- "Congress Extends Renewable Energy Tax Credits in 2021 Omnibus Spending Bill," December 23, 2020
- "Blockchain in the Electricity Industry: Six Items to Consider," September 28, 2020
- "Federal Energy Regulatory Commission Gives Distributed Energy Resource Aggregators a Boost; Implementation Will Present Challenges," September 25, 2020
- "Natural Gas Pipeline Development," July 21, 2020
- "FERC Rejects Net Metering Petition, But Fight Is Far From Over," July 17, 2020
- "FERC Order No. 860 Mandates New Market-Based Rate Filing and Reporting Requirements for Sellers of Electric Energy," July 1, 2020
- "CPUC Issues Order Promoting the Development and Interconnection of Microgrids," June 22, 2020
- "FERC Issues Regulation Prohibiting Construction of Newly Approved Natural Gas Pipeline Facilities Until Resolution of all Rehearing Requests," June 16, 2020
- "Tax Equity for Public Utilities," June 8, 2020
- "FERC Issues Revised Guidance Regarding Return on Equity Calculations," May 26, 2020
- "FERC Reaffirms Controversial Energy Capacity Decisions: Insights and Analysis," April 24, 2020
- "Walking the Path of Utilities' Ownership of Wind and Solar," April 10, 2020
- "FERC Orders, Notices, and Other Guidance Regarding the Novel Coronavirus," April 8, 2020
- "FERC Continues to Squeeze Renewable Resources Participating in Wholesale Electric Capacity Markets," March 6, 2020

Real Estate, Land Use and Environmental Blog Posts

- "FERC Proposes Major Changes to PURPA Regulations Impacting Qualifying Facility Rates and Requirements; Throwing Roadblocks in the Path of Renewable Energy Development," September 26, 2019
- "9th Circuit Says CPUC's Standard Contract and Re-MAT Program for Certain Renewable Generators are not PURPA Compliant," August 14, 2019

- "FERC Order No. 860 Mandates New Market-Based Rate Filing and Reporting Requirements for Sellers of Electric Energy," August 19 2019
- "D.C. Circuit Says NEPA Requires FERC To Inquire Into Up and Downstream Effects of Pipeline Project," June 21, 2019

Law of the Ledger Blog Posts

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"Blockchain Continues to Make Headway in the Energy Industry," July 30, 2019

Media Mentions

FERC Tax Policy Change Hurts Pipeline MLPs, DC Circ. Told
Law360, 07.15.2019

Law360's Weekly Verdict: Legal Lions & Lambs
Law360, 09.27.2017

Events

Webinar: Solution, or Compounding the Problem? FERC's Order on PJM's Minimum Offer Price Rule
02.18.2020

Memberships

Member, Energy Bar Association

Member, Maryland Bar Association

Practices

Energy, Infrastructure and Project Finance

Appellate

Real Estate and Land Use

Environmental

Litigation

Industries

Cannabis

Energy, Infrastructure and Project Finance

Education

J.D., American University Washington College of Law, 2010

B.A., University of Maryland, 2003

Admissions

District of Columbia

Maryland

U.S. District Court for the District of Maryland

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

U.S. Court of Appeals for the Ninth Circuit

U.S. Court of Appeals for the Fourth Circuit