



Stephen J. Hug
Partner

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About Stephen

Stephen Hug represents clients in matters related to federal and state regulatory policies, regulations and rules applicable to the electric and renewable power industries. He has experience with the Federal Energy Regulatory Commission (FERC) and the Federal Power Act (FPA), including FERC enforcement and compliance, wholesale power trading, centralized energy and capacity markets, transmission and interconnection matters and representation of utilities in contested proceedings before FERC. Stephen also has experience with state regulatory matters, including state net metering programs, state renewable portfolio standards, interconnection issues, retail choice programs, and solicitations for offshore wind and other renewable resources.

Stephen also has extensive experience negotiating commercial agreements on behalf of generation developers, storage operators, and energy marketers. Among other things, Stephen has negotiated power purchase agreements, tolling agreements, agreements for the sale of renewable energy credits, and non-wires alternative agreements.

Prior to joining Bracewell, Stephen was an attorney advisor in the Office of the General Counsel, Energy Markets at FERC, where he reviewed and analyzed filings submitted under Section 205 and 206 of the FPA.

Recent Notable Matters

Equinor — \$1.1 billion sale of a 50 percent interest in two US offshore wind development projects to BP, including formation of a partnership to develop and operate the Empire Wind project offshore New York and Beacon Wind project offshore Massachusetts, which together could generate up to 4.4 GW

Tenaska Inc. — complaint proceeding at FERC against Southwest Power Pool challenging allocation of approximately \$100 million in network upgrade costs to wind generation facility

Convergent Energy and Power LP — negotiation of settlement related to rates assessed by Southern California Edison for charging energy storage resources interconnected to SCE's distribution system

New England Power Generators Association — complaint against ISO New England Inc. concerning the retention of resources needed for fuel security

Vistra Energy Corp. — FERC approvals and other regulatory submittals for exchange of equity interests with NextEra in natural gas fired generators

Equinor Wind Services LLC — agreement for sale of offshore wind renewable energy certificates to the New York State Energy Research & Development Authority

Oakland Power (f/k/a Dynegy Oakland) — proceedings pertaining to reliability must-run agreement with the California Independent System Operator Corp.

Avangrid Renewables Holdings, Inc. — FERC approval of acquisition of outstanding membership interests in 162 MW wind powered electric generation facility

Shell New Energies US LLC — FERC approval for acquisition of competitive retail supplier

Energy storage developer — agreement for sale of resource adequacy to California Community Choice Aggregator

Avangrid Renewables Holdings, Inc. — FERC approval to make sales of energy, capacity, and ancillary services to affiliated franchised public utility

Convergent Energy and Power LP — negotiation of settlement agreement establishing first-of-its kind pilot program for energy storage resources participating in the regulation markets operated by PJM Interconnection, L.L.C.

Rockland Capital, LLC — FERC approvals and other regulatory submittals for Rockland's asset acquisition of a portfolio of six generating plants with a combined generation capacity of 972.5 MW from AES Ohio Generation

Texas Microgrid, LLC — first-of-its-kind project financing for the construction and operation of a portfolio of distributed microgrids consisting of ultra-clean natural gas-fired generators within ERCOT service territory with up to 232 MW of generating capacity

AP Energy Holdings Inc and South Field Energy LLC — \$1.3 billion project financing and equity arrangements for the construction of the South Field Energy project, a 1,182 MW combined-cycle natural gas electric generating facility located near Wellsville, Ohio

Publications and Speeches

"Distributed energy resources," Proximo US Power and Renewables Finance 2021, November 2021.

"NYISO Market Updates & Dynamics: Their Implications for Market Participants," EUCI, September 2020.

"Another Year of Enforcement at FERC and CFTC," *Law360*, January 2017.

"FERC Reconsiders Horizontal Market Power in Transactions," *Law360*, September 29, 2016.

"FERC Alters Proposal to Enhance Reporting in Support of Enforcement," *Electric Light & Power*, August 2, 2016.

"Court Clarifies Application of FERC Anti-Manipulation Rule to Demand Response Service Providers," *Electric Light & Power*, July 19, 2016.

“FERC Denies Request for Discovery by Respondent in FERC Enforcement Case,” *Electric Light & Power*, May 12, 2016.

“FERC Won’t Penalize Reactive Providers with No Rate Schedule on File but Requires Prospective Filings,” *Electric Light & Power*, October 28, 2013.

“FERC’s Latest Market Convergence Agenda: Gas and Electric Coordination,” *Power Engineering*, October 22, 2013.

“FERC Works to Remove Barriers to Transmission Provider, Pipeline Communications,” *Electric Light & Power*, August 20, 2013.

“High Noon in the 7th Circuit,” *Energy & Infrastructure, Energy and Mining Magazine*, June 26, 2013.

Education

American University, Washington College of Law, J.D.
2009 – *cum laude*

University of Ottawa, Common Law Program, L.L.B.
2009 – *cum laude*

University of Massachusetts, B.A.
2005 – *summa cum laude*

Noteworthy

Chambers USA, Nationwide Energy: Electricity (Regulatory & Litigation), 2021

The Legal 500 United States, Energy Regulatory: Conventional Power, 2020 - 2021

International Financial Law Review, Energy and Natural Resources, Rising Star

Affiliations

Energy Bar Association, Chair, International Energy Law and Transactions Committee, 2013 - 2014; Vice-Chair, International Energy Law and Transactions Committee, 2012 - 2013

Bar Admissions

District of Columbia
Virginia