Carrie Mobley

Associate Attorney

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Washington, D.C.

Carrie Mobley is an associate in Gibson Dunn's Washington, D.C. office and a member of the Energy Regulation and Litigation Practice Group. Carrie has extensive experience advising various clients before the Federal Energy Regulatory Commission (FERC). Carrie also has experience relating to retail electric service and customer choice across the United States, having advised retail electric and natural gas supplier clients on a variety of compliance matters. As a member of the firm's Data Centers and Digital Infrastructure practice, Carrie uses her knowledge and experience in the wholesale and retail spheres to advise data center developers, investors, and lenders regarding the delivery of electric power to data centers. Carrie also advises various other electricity sector participants, including solar and wind developers, battery storage owners, and gas-fired electric generators, in various respects, including in a transactional support role.

She has significant experience with various wholesale electric matters, including Regional Transmission Organizations ("RTO") and Independent System Operators ("ISO") market design, RTO/ISO market alternatives, transmission planning and cost allocation, generator interconnection issues, and compliance issues arising across the FERC spectrum.

Carrie is also deeply invested in pro bono efforts. Carrie's pro bono practices focus primarily on immigration (asylum and refugee) issues, and veterans' issues.

More specifically, Carrie's areas of knowledge and experience include:

Compliance

- Frequently called upon to assist clients in interpreting and complying with RTO/ISO Market Rules and Manuals, including most recently:
  - PJM Interconnection, LLC's ("PJM") Interim Resource Adequacy Proposal;
  - PJM's Reliability Backstop Procurement Proposal;
  - Pennsylvania Governor Shapiros' Executive Order No. EO26-5 related to data center development
- Frequently called upon to assist clients in interpreting and complying with FERC rules and regulations, including on issues related to power and capacity sales and market design, generator interconnection, transmission planning, and market-based rates

Transactional Support

- Conducts regulatory and interconnection-related due diligence on energy transactional matters
- Manages pre- and post-closing regulatory requirements on energy transactional

Capabilities

Energy Regulation and Litigation
Administrative Law and Regulatory Practice
Energy and Infrastructure
Mergers and Acquisitions
Power and Renewables

Credentials

Education

George Washington University - 2017 Juris Doctor
Colorado State University - 2014 Bachelor of Arts

Admissions

District of Columbia Bar

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Representative Experience*

Wholesale Market Tariffs and Market Design

- Representation of a group of utilities successfully creating a first-of-its kind market platform in the Southeastern United States extending to parts of 12 states and across two time zones, including representation in multi-year litigation before FERC and the District of Columbia Circuit Court of Appeals ("D.C. Circuit") involving multiple novel procedural and legal issues*
- Representation of a public utility in two fully litigated proceedings before FERC relating to a proposal to implement a new imbalance services market and associated market cost allocation construct*
- Representation of various energy clients related to RTO/ISO tariff and market design issues, including with regards to issues of preemption, and with particular emphasis on cost allocation matters and complaints against RTOs or other matters involving proposed changes to RTO tariffs*

Retail Electric Supply

- Representation of various electric and natural gas suppliers across the United States in compliance matters related to retail power supply, compliance with retail and electric natural gas regulations, and pre- and post-closing transactional support*

Transmission Cost Allocation, Planning

- Representation of a public utility in multiple litigated proceedings before FERC and the D.C. Circuit regarding transmission cost allocation and zonal placement, requiring participation in several multi-day and multi-week hearings before FERC*
- Representation of clients concerning transmission rulemaking proceedings, complaints, and general compliance inquiries regarding transmission planning*
- Representation of clients regarding competitive transmission project solicitations, including assistance with cost containment proposals*

Generator Interconnection

- Representation of clients on generator interconnection issues, including issues related to milestone dates, assignment, and suspension*

*Matters handled prior to joining Gibson Dunn

Carrie received her J.D. from The George Washington University Law School where she was Editor-in-Chief of the George Washington Journal of Energy and Environmental Law. She received a B.A., cum laude, from Colorado State University in Journalism and Political Science. Prior to joining Gibson Dunn, Carrie was an associate in the D.C. office of an international law firm.

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