



Megan J. Somogyi

Partner / Writing Development Program Director

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Practice Areas

Energy | Energy Project Development | Infrastructure | Public Utility Regulation

Megan Somogyi specializes in the California Public Utilities Commission and California regulated utilities. She assists clients in a broad array of utility-related matters, including wildfires and power shutoff proceedings, utility certification and ratemaking, nuclear power plant decommissioning, tariff filings, energy industry rulemakings, administrative litigation, and regulatory compliance.

The CPUC is unique among California regulatory agencies due to its expansive authority over the energy, water, telecommunications, and transportation industries. CPUC regulations and policies impact virtually every sector of the economy and can have significant effects on financial markets. Having an advocate who understands the CPUC's authority, operations, rules, and the institutional history that guides its current decision-making is invaluable.

Megan represents utility and market-participant clients in utility ratemaking proceedings; entities seeking certification to provide utility services; regulated utilities seeking to expand existing service offerings, build new infrastructure, or decommission facilities; and cities and counties in matters relating to utility operations, rates, infrastructure, land use, and permitting. Megan also advises clients on California regulatory issues as part of due diligence inquiries and counsels clients in the financial services industry on issues relating to California's energy markets.

Megan is well-known for her work on behalf of local governments to improve the manner in which electric utilities conduct wildfire mitigation activities and de-energize their power lines to reduce wildfire risk. The CPUC and the large investor-owned utilities have adopted a number of the local governments' recommended policy and operational initiatives. As a result of this work, Megan is one of the foremost experts in California on the CPUC's regulation of utility wildfire prevention and proactive de-energization of power lines as it relates to local government emergency management and response.

In addition to her law practice, Megan serves as the director of the firm's writing development program, an integral component of the firm's comprehensive mentoring and professional success program for associates and young partners.

Experience

Utility Safety

- Represents a coalition of local governments working to improve the manner in which Pacific Gas and Electric Company and Southern California Edison Company de-energize their electric lines to reduce wildfire risk.
- Represents local governments in matters relating to electric utility wildfire mitigation activities, including tree removal and vegetation management.

Utility Ratemaking

- Represents investor-owned utilities, oil pipelines, and independent natural gas and electric service providers in utility general rate cases and other CPUC proceedings addressing utility rates and costs borne by market participants.

Utility Certification

- Represents entities seeking certification to provide vehicle and vessel transportation services, and regulated utilities seeking to expand existing services offerings or build new infrastructure.
- Represents entities seeking California RPS Certification of renewable generation facilities located outside the U.S.

Utility Property and Due Diligence Review

- Represents utilities and non-regulated entities in CPUC proceedings to sell, lease, encumber, transfer, or purchase utility property; and finance, refinance, or issue debt secured by utility property.
- Performs due diligence and transmission interconnection review in connection with the purchase and development of utility-scale renewable energy projects.

CPUC Compliance and Enforcement Proceedings

- Represents independent electric service providers in appeals of CPUC citations
- Counsels clients on statutory and regulatory compliance obligations for utilities and non-utility energy market participants. Clients include utilities, market participants, financial institutions, local governments, and other stakeholders.
- Represents clients in CPUC enforcement proceedings for regulated utilities.

Commercial and Industrial Power Supply; Utility Service Extensions

- Represents commercial and industrial landlords and tenants in power supply agreement negotiations.
- Advises landlords, developers, and agricultural property owners on power supply issues.
- Represents landowners and developers in electric, gas, and water utility service extension matters.

Local Governments

- Represents cities, counties, and other government entities in regulatory matters relating to utility operations, rates, and infrastructure. These matters include the closure of the Diablo Canyon Nuclear Power Plant, regulatory enforcement proceedings that address the recent California wildfires, the siting and construction of electric transmission lines, and permitting and construction of railroad crossings.

Appellate Matters

- Represents clients in appeals from CPUC decisions. Megan was part of the team that successfully obtained from the California Supreme Court the first grant of review of a CPUC decision in almost 20 years.

Professional & Community Service

- Ballet22, Board of Directors, President, 2023; Board Member since 2022
- Power Association of Northern California, Member
- Women in Public Utilities, Co-Founder, 2017-present
- Conference of California Public Utility Counsel, Board of Directors, 2019-2022; Secretary, 2021-2022
- Conference of California Public Utility Counsel, Young Utility Lawyers Section, Co-Chair, 2016-2017
- *Environmental, Energy & Climate Change Law and Regulation Reporter*, Editorial Board Member, 2023

Education

- J.D., University of San Francisco School of Law, 2011
- B.A., University of California, Berkeley, 2003

Honors & Rankings

- Individual recognition for Energy: State Regulatory & Litigation – California, *Chambers USA*, “Up and Coming” 2023
- Best Lawyers® 2023 Administrative/Regulatory Law “Lawyer of the Year” in San Francisco
- Best Lawyers in America®, Administrative/Regulatory Law, 2022-2024
- Best Lawyers in America®, Energy Regulatory Law, 2021-2024
- *Super Lawyers*, Northern California Rising Star, 2015-2021

Speaking Engagements / Events

- *Whack-and-Stack: The Unintended and Unregulated Side Effects of Utility Wildfire Mitigation Activities in California*, Presenter, Practising Law Institute- On Demand Studio Briefings, April 2023
- *Emergency Preparedness, Community Outreach, and Public Safety Power Shutoffs*, Panelist, 2023-2025

Wildfire Mitigation Plan Workshop, April 27, 2023

- *Navigating California's Unique Legal, Permitting, and Environmental Risks for Offshore Wind*, Joint Webinar Presentation, August 5, 2022
- *Energy, Interrupted: A Discussion of the Impact of Climate Change on the California Energy Market and Practical Solutions*, Panelist, CCPUC Annual Meeting, May 2, 2022
- *Energy, Water, and Drought*, Moderator, Conference of California Public Utility Counsel Annual Meeting, May 2, 2022
- *Administrative Litigation before the California Public Utilities Commission*, Speaker, County Counsels' Association Spring Civil Law & Litigation Conference, April 29, 2022
- *California Water Rights, Supply and Quality Webinar*, Speaker, HalfMoon Education Live Webinars, April 25, 2022
- *Public Safety Power Shutoffs: The New Dark Age for California?*, Panelist, 2021 Civil Law & Litigation Conference, May 2021
- *New CPUC Regulation of Community Choice Aggregators*, Speaker, League of California Cities 2018 Annual Conference, September 2018
- *Californians Know How to Conserve Water During a Crisis, But Can We Be Efficient Without One*, Moderator, Women in Public Utilities (MCLE), September 2018
- *"Can you bring me some coffee, hon?" Breaking the Silence on Gender Bias in the Utility Industry*, Moderator, Co-Presented by Women in Public Utilities and the Conference of California Public Utility Counsel (MCLE), January 2018
- *Petitions for Review in the California Supreme Court*, Panelist, 88th Annual State Bar of California, 2015

Publications

- *California Public Utilities Commission Establishes its Senate Bill 884 Expedited Undergrounding Program for Power Lines*, California Land Use Law & Policy Reporter, Volume 33, Number 7, April 2024
- *California Energy Commission Releases Draft Offshore Wind Plan That Details Port Infrastructure Needs*, California Land Use Law & Policy Reporter, Volume 33, Number 6, March 2024
- *Tenth Circuit Reverses \$500,000 Clean Water Act Penalty After Incomplete Application of Maui Factors by the District Court*, Environmental, Energy, & Climate Change Law and Regulation Reporter, Volume 4, Number 5, February 2024
- *California Public Utilities Commission Extends Diablo Canyon Nuclear Power Plant Operations Until 2030*, California Land Use Law & Policy Reporter, Volume 33, Number 4, January 2024
- *EPA Issues New Clean Water Act Section 401 Water Quality Certification Rules to Expand Authority of States and Tribes and Clarify Certification Procedures*, Environmental, Energy, & Climate Change Law and Regulation Reporter, Vol. 4, Number 2, November 2023
- *D.C. Circuit Finds U.S. Surface Transportation Board Failed to Take a 'Hard Look' at Utah Oil Rail Project's Environmental Impacts Under NEPA*, Environmental, Energy & Climate Change Law and Regulation

Reporter, Volume 4, Number 1, October 2023

- *'Waters of the United States' Redefined - EPA and the Corps Issue Conforming WOTUS Rule in Wake of the Sackett Decision Narrowing the 'Reach' of the Clean Water Act*, Environmental, Energy & Climate Change Law and Regulation Reporter, Volume 4, Number 1, October 2023
- *California Utilities Commission Proposes Increased Storage Capacity at Aliso Canyon*, Environmental, Energy & Climate Change Law and Regulation Reporter, Volume 3, Number 11, August/September 2023
- *CAISO 2022-2023 Transmission Plan Shifts to Progressive Transmission Planning*, Environmental, Energy & Climate Change Law and Regulation Reporter, Volume 3, Number 10, July 2023
- *D.C. Circuit Requires EPA to Regulate Perchlorate Levels Under the Safe Drinking Water Act*, Environmental, Energy & Climate Change Law and Regulation Reporter, Volume 3, Number 9, June 2023
- *Recent Developments for California Offshore Wind*, Downey Brand Energy Publication, May 26, 2022
- *California Offshore Wind Gains Momentum with Two Key Milestones in April*, Downey Brand Energy Publication, April 15, 2022
- *Developing Offshore Wind in California – Environmental Permitting and Interconnection Considerations*, Downey Brand Energy Publication, February 18, 2022
- *Local Governments and Communities Should See Improved Coordination, Service Under PG&E Regionalization Proposal*, Goodin Macbride Administrative Law Blog, July 23, 2020
- *Opinion Analysis: Monterey Peninsula Water Management District v. California Public Utilities Commission*, Guest Blogger, SCOCA Blog, January 30, 2016
- *Objection! Hearsay: The Prohibition Against Basing CPUC Findings on Uncorroborated, Contested Hearsay Evidence*, Goodin Macbride Administrative Law Blog, February 12, 2014
- *Deference Means Never Having to Say "You're Wrong:" the Potential Effect of City of Arlington v. FCC on California Law and the CPUC*, Goodin Macbride Administrative Law Blog, June 10, 2013

Legal Alerts

- *CPUC Issues Rulemaking to Address Electric Utility Failures to Connect or Upgrade Service for Electric Consumers*, January 31, 2024
- *Department of Transportation Announces \$426.7 Million Grant to Develop Deepwater Port and Marine Terminal in Humboldt Bay*, January 29, 2024
- *California Energy Commission Releases Draft AB 525 Offshore Wind Strategic Plan*, January 25, 2024
- *Newly Signed SB 286 Streamlines and Clarifies Permitting Process for Offshore Wind*, October 19, 2023
- *New Law Creates Central Procurement Mechanism to Enable Offshore Wind Development*, October 12, 2023
- *CEC Releases Offshore Wind Permitting Roadmap that Proposes Several Permitting Pathways*, May 4, 2023
- *CAISO Draft Plan Signals Shift to Proactive Transmission Planning*, April 14, 2023

- *California Energy Commission Releases Draft Permitting Roadmap for Offshore Wind Development and Report on Economic Benefits of Offshore Wind*, January 4, 2023
- *BOEM Announces Results of First West Coast Offshore Wind Lease Sale*, December 7, 2022
- *BOEM Publishes Final Sale Notice for California Offshore Lease Areas*, October 25, 2022
- *California 2022–2023 Energy Budget*, July 8, 2022
- *PG&E Proposes Significant Rates Increases for Agricultural, Commercial, and Industrial Customers*, February 18, 2022
- *Significant Transmission Additions and Upgrades Identified in the California Grid Operator's 20-Year Transmission Outlook*, February 18, 2022
- *California Natural Gas Utilities Propose New GHG Emissions Reduction Calculation Methodology for Biomethane Projects*, January 31, 2022
- *California Public Utilities Commission Proposes Eliminating Financial Incentives to Developers for Natural Gas Appliances and Service Line Extensions*, November 19, 2021