Jennifer Littlefield

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PRACTICES Commodities, Energy Regulatory, Energy Transition, Energy, Power and Natural Resources, Vehicle Electrification, Renewable Energy, Traditional Power

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Jennifer Littlefield is a regulatory and transactional attorney with a focus on electric power regulations and the Texas energy markets.

She represents electric cooperatives, renewable energy providers, retail electric providers, battery storage facilities, and other market participants on a wide range of permitting and administrative matters. With a previous background at both the Public Utility Commission of Texas (PUCT) and Electric Reliability Council of Texas (ERCOT), Jennifer has an in-depth knowledge of the complex regulatory requirements for ERCOT wholesale and retail electricity market participants.

Jennifer assists clients in negotiating a variety of electric power market transactions, such as long-term power purchase agreements, transmission interconnection agreements, facilities extension agreements, and Qualified Scheduling Entity (QSE) agreements.

Clients also rely on Jennifer's expertise for guidance on compliance with the Public Utility Regulatory Act (PURA), PUCT rules, North American Electric Reliability Corporation (NERC) Standards, Federal Energy Regulatory Commission (FERC) policy matters, and ERCOT policy matters. Jennifer represents clients before the PUCT and the State Office of Administrative Hearings (SOAH) in rate case proceedings, retail and wholesale licensing proceedings, transmission Certificate of Convenience and Necessity (CCN) proceedings, rulemakings, and contested case proceedings.

Additionally, Jennifer advises clients on various regulatory matters, such as conducting compliance training for wholesale electricity market transactions and operations in the ERCOT market, providing guidance on establishing or expanding operations in the ERCOT market, and advising on compliance investigations and audits by the PUCT, ERCOT, and the Texas Reliability Entity (Texas RE).

Jennifer is a member of the Energy, Power and Natural Resources Practice Group in the Austin office of Haynes Boone.

QUALIFICATIONS

EDUCATION

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- J.D., The University of Texas School of Law, 2010
- B.A., Political Science, Texas State University, 2002

ADMISSIONS

- Texas

SELECTED CLIENT REPRESENTATIONS

- Represented transmission service providers in Certificate of Convenience and Necessity (CCN) proceedings
- Represented transmission service providers and electric service customers in Transmission Cost of Service (TCOS) rate cases
- Represented clients in negotiating power purchase agreements for buyers and sellers of wholesale electric power
- Represented clients in negotiating QSE agreements
- Represented transmission service providers and power generation companies in negotiating generation interconnection agreements for transmission level and distribution level generation in ERCOT
- Provided regulatory guidance for sale, transfer, merger transactions involving generation and transmission assets
- Represented project companies and tax equity investors in diligence reviews for utility-scale wind and solar generation projects
- Assisted market participants in acquiring and maintaining PUCT licenses and registrations, including Retail Electric Provider (REP), Power Generation Company (PGC), Power Marketer, and Self-Generator registrations
- Assisted market participants in acquiring and maintaining ERCOT registrations, including Load Serving Entity (LSE), Qualified Scheduling Entity (QSE), Resource Entity (RE), Energy Storage Resource (ESR), and Congestion Revenue Rights Account Holder (CRRAH) registrations
- Conducted regulatory compliance trainings for power generation companies
- Represented market participants in PUCT rulemaking proceedings and ERCOT Protocol revision (NPRR) proceedings
- Provided guidance on statutory changes, including wholesale electric market design changes; requirements related to sale, transfer, merger transactions; and electric vehicle regulations
- Represented market participants in PUCT compliance and enforcement proceedings
- Represented market participants in NERC audit and enforcement proceedings
- Provided PUCT, ERCOT, and NERC compliance guidance for renewable generation providers, battery storage facilities, retail electric providers, qualified scheduling entities, and other market participants
- Represented market participants ERCOT Alternative Dispute Resolution (ADR) proceedings

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AWARDS AND RECOGNITIONS

- Recognized by *Chambers USA*, Chambers and Partners, in Energy: State Regulatory and Litigation (Electricity) (Texas), 2024-2026

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