

## People

### Christopher D. Zentz

Partner, Corporate

Washington, D.C. \*

T: +1 202 824 1714

[chris.zentz@akerman.com](mailto:chris.zentz@akerman.com)

vCard

Focusing on regulatory and transactional law within the energy sector, Chris Zentz has significant experience representing a diverse array of clients, including investor-owned utilities, public power entities, independent power producers, renewable developers, investors, governmental entities, and power marketers. His practice spans both energy transactions and regulatory proceedings, reflecting his broad expertise in the industry.

Chris's transactional work involves negotiating key project contracts necessary for the construction and financing of generation projects. He leverages his business acumen to develop solutions-focused strategies for complex contractual arrangements. His experience includes advising clients on due diligence and obtaining necessary regulatory approvals at both federal and state levels.

In his regulatory practice, Chris assists clients with federal compliance issues, including transmission and ancillary service rate cases, Open Access Transmission Tariff (OATT) compliance, generator interconnection issues, and the FERC Standards of Conduct. He also advises on interlocking directorate issues and transmission planning. His work often involves navigating FERC regulatory matters, such as obtaining market-based rate authorizations and prior authorizations under Section 203 of the Federal Power Act, as well as ensuring compliance with federal statutes like the Public Utility Regulatory Policies Act and the Public Utility Holding Company Act.

Chris's background includes in-house experience and entrepreneurship, which allows him to understand the pressures and demands his clients face. He immerses himself in his clients' businesses to tailor his legal advice effectively, aiming to achieve practical and efficient outcomes that align with their business objectives.

## Notable Work

### Areas of Experience

Energy and Infrastructure  
Project Finance and Development  
Renewable Energy and Electric Power  
Corporate  
M&A and Private Equity

### Education

J.D., Seattle University School of Law, 2010, cum laude  
B.A., University of Washington, 2007

### Admissions

### Bars

District of Columbia  
Washington  
Oregon

### Related Content

Akerman Expands Corporate Practice Group With Energy Transactions and Regulatory Partner Chris Zentz  
June 25, 2025

### Location

\*Non-resident

## **Transactional Work**

**Energy Assets:** Represents purchasers and sellers of energy assets in the negotiation of deal documents and power purchase and sale, electric storage, transmission service, and interconnection agreements.

**Transfer Agreements:** Represents project proponents, owners, and operators in the negotiation of offtake and/or build-transfer agreements across the technology spectrum.

**Renewable Energy Developers:** Advises renewable energy developers on various pre-operational matters, including negotiation of interconnection and transmission service agreements, obtaining regulatory approvals and certifications, and resolving disputes over FERC-regulated assets or processes.

**Energy Project Transactions:** Handled various transactional work, including the negotiation of offtake agreements for a 198 MW wind project in Indiana; negotiation of a tolling agreement for a 200 MW battery storage project in the Pacific Northwest; lead diligence counsel for syndicated lender group(s) financing several renewable energy projects, including a nearly 600 MW wind farm in Oklahoma and an approximately 200 MW wind farm in Illinois; and negotiation of a distribution-scale PPA for a small-scale solar facility in Ohio.

**Federal Power Act:** Represents independent power producers, renewable developers, power marketers, utilities, and investors in power projects in transactional and regulatory matters involving the Federal Power Act, including by obtaining approvals under FPA Section 203 and completing post-closing regulatory obligations.

**FERC-Jurisdictional Assets:** Represented an institutional investor in a transaction involving FERC-jurisdictional assets, including in obtaining FERC approvals and post-closing regulatory filings, valued at over \$16 billion.

**FERC-Jurisdictional Assets:** Represented a private equity firm in acquiring FERC-jurisdictional assets, which included negotiation of deal documents, obtaining regulatory approvals, post-closing filings, and ongoing, post-closing FERC compliance obligations.

**FERC Approvals:** Represented two large institutional investors in renewable generation facilities in obtaining requisite FERC approvals and authorizations to acquire interests in over \$2 billion worth of energy assets.

**FERC Approvals:** Counseled a large, independently owned utility through obtaining FERC approval for two acquisitions of combined cycle gas generation facilities from unaffiliated third parties.

**Energy Agreements:** Experience working with the Western Systems Power Pool Agreement, EEI Master Services Agreement, and custom agreements.

**Solar Acquisition Deals:** Represented a large public utility in several solar acquisition deals, which included asset purchase agreement negotiation and drafting, preparation of document schedules and ancillary agreements, and oversight of due diligence process.

**Hydropower Generation Project Acquisition:** Served as project lead on behalf of an international utility and project developer in

acquiring a large pumped storage hydropower generation project. Representation included negotiating and drafting of transaction documents, due diligence, environmental review, and obtaining regulatory approvals.

**Utility Transaction:** Counseled an independently owned utility on a transaction involving an asset swap and tax deferred exchange of transmission assets and capacity, which included drafting and negotiating documents, obtaining regulatory approvals, drafting ancillary agreements, and researching various transaction-specific issues.

### **Regulatory Work**

**Federal and State Regulatory Matters:** Represents utilities, renewable developers, and energy companies in various federal and state regulatory matters involving transactions, rate cases, OATT issues and compliance, negotiation of transmission and interconnection agreements, market-based rates, standards of conduct, interlocking director rules, electronic quarterly reporting, FERC accounting rules, audits, and other compliance matters.

**Transactional and Market-Based Rate Approvals:** Represented several utility and developer clients on obtaining various transactional and market-based rate approvals, including approvals under Section 203 of the Federal Power Act, obtaining market-based rate authority, filing of triennial market power updates, and preparing post-transaction regulatory filings.

**Energy Agreements:** Regularly negotiates agreements for transmission service, generator interconnection, transmission-to-transmission interconnection, ancillary services, balancing authority areas, and dynamic transfers.

**Business Formation:** Counseled international utility and project developer through all matters for the startup of a new business — namely, formation of an unprecedented generation-only balancing area. Representation included strategic advice on regulatory issues, obtaining regulatory approvals, and advising on compliance matters.

**Start-Up and Compliance:** Represents several of the initial California Independent System Operator Corporation EIM Entities on all stages of startup and compliance, including drafting regulatory filings and documents; providing advice regarding compliance obligations; preparing OATT revisions, business practice manuals, and other internal compliance manuals; and staying abreast of changes in the EIM market structure.

**FERC Compliance:** Represented a coalition of large, independently owned utilities throughout the FERC Order No. 1000 Regional Transmission Planning and Cost Allocation compliance process.

**Resource Plan Proceedings:** Regularly participates in various state integrated resource plan proceedings on behalf of an international utility and project developer, including drafting and filing comments, reviewing and commenting on various filings, and attending state utility commission proceedings.

**FERC and State Utility Commissions Compliance:** Represented one of the largest independently owned utilities on all matters of regulatory compliance before the FERC and various state utility commissions, including in administrative hearings and informal

disputes with a federal power marketing agency, and on regulatory compliance issues.

**FERC Rate Matters:** Advised a large, independently owned utility on preparation and filing of an ancillary services rate case with FERC to update rate schedules, which included providing assistance and representation throughout the FERC hearing process.

**FERC Complaint:** Represented a large, independently owned utility in defending a complaint brought by the Bonneville Power Administration before FERC regarding interpretation of the OATT and legacy contracts, rollover rights upon termination of grandfathered transmission agreements, and load service under pre-Order No. 888 agreements.

**FERC Audit/OATT Compliance:** Represented a large, independently owned Northwest utility in connection with a FERC audit and with OATT compliance matters.

## Published Work and Lectures

- *Financier Worldwide*, Co-Author, “Utilities and Pipelines – Diversification into Non-Traditional Businesses,” January 2025

## Affiliations

- Washington State Bar Association, Member, 2010-Present
- Energy Bar Association, Member, 2012-Present
- Oregon State Bar Association, Member, 2015-Present
- Spokane Bar Association, Volunteer Lawyers Program, 2020-Present
- Oregon State Bar Association, Energy, Telecom & Utility Law Section, Board Member, Member, 2015-Present; Board Member, 2022-Present
- District of Columbia Bar Association, Member, 2024-Present