Anne K. Dailey

Counsel

Washington, D.C.

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With her strong understanding of electric utility regulation, Anne skillfully assists her clients with navigating the FERC regulatory landscape. Clients rely heavily on Anne for her ability to identify, evaluate and avoid potential problems.

OVERVIEW

Anne advises electric utility clients on complex federal energy regulatory matters, with a particular focus on practice before the Federal Energy Regulatory Commission (FERC). As a former firm partner who spent nearly two decades in private practice before serving in?house as senior corporate counsel at a large investor?owned utility, Anne brings a practical, business?oriented perspective to regulatory strategy, compliance, and litigation.

Anne counsels utilities and transmission owners on all aspects of federal regulation of electricity, including Open Access Transmission Tariff (OATT) issues, implementation of FERC Order Nos. 890 and 1000, generator interconnection policies, and the FERC Standards of Conduct. She regularly advises on cost?of?service and formula ratemaking, compliance with portions of the Public Utility Regulatory Policies Act of 1978 (PURPA), and transactions and rate matters under Sections 203 and 205 of the Federal Power Act. Her experience includes managing internal investigations, responding to inquiries by FERC enforcement staff, and negotiating the resolution of enforcement and compliance issues.

In her prior tenure at the firm, Anne developed and executed regulatory strategy in contested administrative proceedings, preparing pleadings and testimony, managing discovery, and examining witnesses at trial?type hearings. She has represented a broad range of investor?owned utilities and transmission companies before FERC and state regulators. Anne also has experience advising on gas and electric utility matters before the Virginia State Corporation Commission.

Anne is active in the energy bar and has held leadership roles within law firm practice groups, including serving as cross?development partner for an energy regulatory team and chairing multiyear energy client conferences.

REPRESENTATIVE MATTERS

- Represents electric utilities in FERC trial-type hearing processes, including discovery strategy, development of pre-filed testimony and exhibits, direct and cross-examination of witnesses at hearing, and preparation of post-hearing briefs.
- Represents clients during FERC-initiated enforcement and investigation processes, including risk analysis and

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evaluation.

- Advises investor-owned electric utilities on ongoing compliance with FERC Order Nos. 888, 890, and 1000.
- Advises clients on compliance with NERC requirements, including audits by regional reliability entities.
- Represented an investor-owned electric utility in its successful withdrawal from the Regional Transmission Organization (RTO).

AWARDS

- *Best Lawyers in America*®: Energy Law (2022)

TOP AREAS OF FOCUS

- Energy

ALL AREAS OF FOCUS

- Energy
- Energy Policy + Legislation
- FERC
- Privacy + Cyber

PROFESSIONAL EXPERIENCE

- Senior corporate counsel, Ameren Services, 2022-2025

EDUCATION AND CERTIFICATIONS

EDUCATION

- George Mason University Antonin Scalia Law School, J.D., 2003
- College of William & Mary, B.A., 1996, history

CERTIFICATIONS AND MEMBERSHIPS

- Member, Energy Bar Association

BAR ADMISSIONS

- District of Columbia
- Virginia

COURT ADMISSIONS

- District of Columbia Court of Appeals

SPEAKING ENGAGEMENTS

- Moderator, “Cost Allocation & New Tariff Structures — Avoiding Rate Increases and Customer Blowback,” Infocast’s Transmission & Interconnection Summit, June 24, 2026.
- Moderator, “Cyber Security – Collaboration With Local, State, Federal and International Government,” Emerging Issues Policy Forum, November 2016.
- Moderator, “EPA’s Clean Power Plan: State Plans and Consumer Impact,” Women’s Emerging Issues Policy Forum, October 2015.

PUBLICATIONS

- Co-author, “Utilities and Renewable Energy: To Buy or to Build,” *Law360*, 2009.
- Co-author (as Anne K. Mitchell), “Electric Utility Restructuring After California,” *Journal of Energy & Natural Resources Law*, Vol. 21, No. 1 (2003).

MEDIA COMMENTARY

- Featured, “Biden Weighs Preserving Infrastructure EO Focused on Cybersecurity,” *POWER*, April 1, 2021.