



## Sandra E. Safro

### Partner

Washington DC  
+1.202.778.9178

Houston  
+1.713.815.7338

sandra.safro@klgates.com

## OVERVIEW

Sandra Safro is a partner in the firm's Washington, D.C. and Houston offices. She co-leads K&L Gates' global hydrogen initiative and serves as a practice group coordinator for the oil, gas, and resources practice within the firm's energy, infrastructure, and resources practice group. She focuses her practice on regulatory, policy, and transactional issues related primarily to natural gas, liquefied natural gas (LNG), crude oil, natural gas liquids (NGLs), and hydrogen. Sandra regularly advises clients on matters related to commodity and pipeline transportation issues, including the Federal Energy Regulatory Commission's (FERC) policies related to capacity release and in the negotiation of precedent agreements, negotiated rate agreements, asset management arrangements, transportation service agreements, and the terms and conditions of service included in pipeline tariffs. Sandra also advises clients on issues related to the import and export of LNG, including commercial agreements related to terminal capacity, developments on Capitol Hill, and proceedings before FERC and the Department of Energy (DOE). She represents clients in natural gas and oil pipeline rate proceedings before the FERC and state agencies and advises clients on pipeline safety issues before the Pipeline and Hazardous Materials Safety Administration (PHMSA).

Sandra's clients include natural gas and LNG marketers, importers, exporters, and project developers; oil pipelines and shippers; oil and gas drilling companies; financial institutions; and state and provincial government officials. She co-lead and contributed to The H2 Handbook and co-hosts the firm's biweekly hydrogen podcast, Hydrogen Rising. Sandra also chairs a committee on the firm's Women in the Profession committee and is a member of the hiring committee for the Washington, D.C. office.

## PROFESSIONAL BACKGROUND

Prior to joining the firm, Sandra was a member of the energy and environmental practice group at a Washington, D.C. law firm. She also worked in the compliance department of an energy trading company during a secondment in 2012.

## ACHIEVEMENTS

- Named to Best Lawyers in America, "Best Lawyers - Energy Regulatory Law", 2018-2021

- Selected as a “Rising Star” in Energy by the 2016 and 2017 editions of Super Lawyers
- Named to “Trending 40's Top Lawyers Under 40” in 2016 by Legal Bisnow

## PROFESSIONAL / CIVIC ACTIVITIES

- Energy Bar Association, Board Member, 2016-2019
- Charitable Foundation of the Energy Board Association, Board Member, 2014-2015
- Energy Bar Association, Young Lawyers Committee, Vice Chair, 2013-2014

## SPEAKING ENGAGEMENTS

- Panelist, Hydrogen at Scale, MIT Energy Conference - Mar. 12, 2021
- Guest, K&L Gates Sandra Safro - Hydrogen, Edison Electric Institute's The Current, Podcast - Dec. 10, 2020
- Moderator, Hydrogen Markets in the Americas and the Transition to Low/No Carbon Hydrogen, S&P Global Platts Hydrogen Markets Americas Virtual Conference - Nov. 10, 2020
- Speaker, Energy and Environmental Policy in the Next Administration, KLG - Nov. 5, 2020
- Moderator, Do Indexed Rates Still Work for Oil Pipelines?, Energy Bar Association, Fall Forum - Oct. 14, 2020
- Speaker, Ethical Considerations for Landmen, AAPL 2020 Virtual Annual Meeting Session - June 24, 2020
- Roundtable Leader, Sponsors, Influencers & Career Engineering, The Women in Law Summit Series, Women, Diversity & Change - May 16, 2019
- Speaker, “Midstream Update, Challenges and the Real World,” Midstream PA 2017, October 19, 2017
- Moderator, “Pipeline Development Disputes: Where is the Litigation Taking Us?” Shale Insight 2017, September 27, 2017
- Speaker, “Pipeline construction continues – Or not,” Kallanish North America Oil & Gas 2017, May 23, 2017
- Speaker, “The Criminalization of Environmental Regulation: How to Respond and is There More to come?” K&L Gates, February 28, 2017
- Speaker, “The Sky's the Limit: Unmanned Aircraft in the Natural Gas Industry,” Shale Insight 2016, September 21, 2016
- Speaker, “Not in My Backyard - NIMBY Issues Facing Energy Infrastructure Projects,” E4 Carolinas, September 15, 2016
- Speaker, “From Shale to Sail, Production, Transportation, and Export of U.S. Oil and Gas,” American Bar Association, Section of Environment, Energy, and Resources, April 1, 2016

- Panel Moderator and Speaker, “Congressional Briefing on U.S. Liquefied Natural Gas Exports to India,” USINPAC, July 30, 2014
- Speaker, “Fossil Fuel Exports,” University of Pittsburgh School of Law, 2013 Energy Law Policy Institute, August 1-2, 2013
- Panel Moderator, “Pipeline Planning, Permitting, Construction, and Operation,” University of Pittsburgh School of Law 2013, Energy Law Policy Institute, August 1-2, 2013

## EDUCATION

- J.D., Catholic University of America Columbus School of Law, 2008 (*magna cum laude*)
- B.A., George Washington University, 2004 (*magna cum laude*)

## ADMISSIONS

- Bar of District of Columbia
- Bar of New Jersey
- Bar of New York
- Bar of Texas

## THOUGHT LEADERSHIP POWERED BY HUB

- 14 July 2021, Sizing up the Scale of MENA's Potential Role in the Hydrogen Economy (*Podcast*)
- 30 June 2021, Taking a Regional Approach to Hydrogen: A Conversation with DC-based Connected DMV (*Podcast*)
- 30 June 2021, ESG and the Sustainable Economy Handbook (*Books*)
- 16 June 2021, U.S. Department of Energy and Capitol Hill Advance Hydrogen Priorities (*Alerts/Updates*)
- 19 May 2021, Fuel Cells & Beyond: Cummins & the Hydrogen Economy (*Podcast*)
- 5 May 2021, France: The Growth and Evolution of the Hydrogen Economy (*Podcast*)
- 7 April 2021, From Concept to Market - H2 Advances in Germany (*Podcast*)
- 24 March 2021, Hydrogen Is Truly Rising -- Opportunities for the Aviation Industry (*Podcast*)
- 24 February 2021, D.C. Circuit Grants EPA's Request to Keep Clean Power Plan on Ice (*Alerts/Updates*)
- 24 February 2021, The Colors of Hydrogen: Simple or Oversimplified? (*Podcast*)
- 10 February 2021, LNG and LH2 Exports: Potential Challenges, Opportunities, and Lessons Learned (*Podcast*)

- 4 February 2021, Washington State Legislature Considers First of Its Kind State-Level Natural Gas Ban (*BlogPost*)
- 27 January 2021, Leveraging the Existing U.S. Natural Gas Pipeline System for Hydrogen Transportation (*Podcast*)
- 26 January 2021, D.C. Circuit Vacates Trump's ACE Rule and Deals Biden's EPA New Hand for Regulating Power Plant Greenhouse Gas Emissions (*Alerts/Updates*)
- 13 January 2021, Opportunities for Hydrogen in the Biden Administration (*Podcast*)
- 2 December 2020, Japan's Road Map for a Hydrogen Economy (*Podcast*)
- 19 November 2020, Blending Hydrogen Into U.S. Natural Gas Pipelines: Three Issues to Resolve (*BlogPost*)
- 16 November 2020, Energy Storage Handbook Vol. 6 (*Alerts/Updates*)
- 5 November 2020, Energy & Environmental Policy in the Next Administration (*Webinar*)
- 5 November 2020, Singapore's Potential Role in a Regional and Global Hydrogen Economy (*Podcast*)
- 21 October 2020, Hydrogen Rising: A Sustainable Energy Source on the Brink of Commercial Scale Development (*Podcast*)
- 17 September 2020, Senate ENR Committee Holds Hearing on FERC Commissioner Nominees (*BlogPost*)
- 15 September 2020, Senate ENR Hearing Slated for FERC Nominees (*BlogPost*)
- 28 July 2020, Trump Nominates Clements, Christie to FERC (*BlogPost*)
- 18 June 2020, FERC Commissioner McNamee Will Remain on Commission After Term Ends on June 30th (*BlogPost*)
- 12 June 2020, JOA Disputes, Energy/Oil and Gas Industry, and International Arbitration Trends (*Webinar*)
- 12 March 2020, COVID-19: Federally Regulated Energy Businesses (*Alerts/Updates*)
- 17 February 2020, Certain Uncertainty at FERC: Areas to Watch in 2020 for Natural Gas Pipelines and LNG and Hydropower Facilities (*Alerts/Updates*)
- 14 December 2018, Energy and Infrastructure (*BlogPost*)
- 13 December 2018, Energy and Infrastructure: Leveraging the Opportunity Zones Tax Incentive to Improve Returns on Development and Operations in The Oil and Gas and Power Industries (*Alerts/Updates*)
- 16 November 2018, Minding the Gap: FERC Issues Proposed Rule To Address Treatment of Income Taxes Following Change in Tax Rates (*BlogPost*)
- 20 June 2018, DOE Takes Concrete Steps to Streamline Permitting and Reassure Global LNG Markets (*Alerts/Updates*)
- 26 April 2018, A Policy Revolution to Match the Shale Revolution? (*Alerts/Updates*)

- 4 August 2017, FERC Welcomes New Commissioners, Quorum Restored (*BlogPost*)
- 31 March 2017, Executive Order Directs Federal Agencies to Reconsider Federal Initiatives Focused on Greenhouse Gas Emissions and Climate Change (*Alerts/Updates*)
- 8 February 2017, The Death of *Chevron* Deference? A Potential Shift in Federal Court Reviews of Agency Decisions (*Webinar*)
- 6 February 2017, FERC Issues Order to Delegate Further Authority to Staff in Absence of Quorum (*BlogPost*)
- 21 December 2016, FERC Issues Notice of Inquiry on Income Tax Allowance Policy Statement and ROE Methodology (*BlogPost*)
- 19 December 2016, Antitrust Claims: A Novel Line of Attack by Groups Opposing Natural Gas Infrastructure Projects (*Alerts/Updates*)
- 4 August 2016, CEQ Issues Final Greenhouse Gas Guidance Directing Federal Agencies to Consider Climate Change in their NEPA Reviews (*Alerts/Updates*)
- 30 June 2016, Federal Court Upholds FERC's Approach on LNG Environmental Permitting and Shifts Focus to Challenges to DOE's Environmental Review (*Alerts/Updates*)
- 23 June 2016, President Obama Signs Pipeline Safety Law: Significant Additional Mandates for PHMSA and Potential for More Rulemakings to Come (*Alerts/Updates*)
- Spring 2016, Environmental Policy Quarterly (*Alerts/Updates*)
- 3 March 2016, Shake-Ups Planned for Pipeline Safety Regulation (*Alerts/Updates*)
- 17 December 2015, Presidential Memorandum Promotes Pre-Project Mitigation and Restoration Banking: Implications for Energy Projects and Related Development (*Alerts/Updates*)
- 21 July 2015, FERC Rejects Requests for Clarification but Provides Additional Details Regarding Pipeline Modernization Surcharge Mechanisms (*Alerts/Updates*)
- 29 April 2015, FERC Policy Statement Regarding Pipeline Recovery of System Modernization Costs (*Alerts/Updates*)
- 24 April 2015, Newly Installed FERC Chairman Norman Bay's Past Opinions Signal Preference for Energetic Use of Commission Authority (*Articles*)

## OTHER PUBLICATIONS

- "Pipeline Projects Face New Questions On Landowner Rights," *Law360* (November 6, 2019)
- "When States Fail To Act On Federal Pipeline Permits," *Law360*, 24 July 2017
- Co-author, "Antitrust: A New Line Of Attack Against Pipelines," *Energy Law 360* (February 13, 2017)

- Co-Author, CEQ Issues Final Greenhouse Gas Guidance Directing Federal Agencies to Consider Climate Change in Their NEPA Reviews, *Pratt's Energy Law Report*, Vol. 16-9, (October 2016)
- FERC's Jurisdiction Now Reaches Ethane Pipelines Too, *Law360* (February 27, 2014)
- The Development of U.S. Shale Gas Resources: Regulation and Litigation, *Managing Power Magazine*, Sept. 1, 2011

## NEWS & EVENTS

- 18 March 2021, *Financial Times*: Hydrogen: what industry insiders think of the 'fuel of the future' (*Media Mention*)
- 10 November 2020, Hydrogen Markets Americas Virtual Conference (*Event*)
- 8 October 2020, Hydrogen Online Conference (*Event*)
- 7 October 2020, K&L Gates Energy Practice Releases First-of-Kind Hydrogen Handbook to Help Clients Capitalize on Growing Global Hydrogen Sector (*Press Release, Practice & Regional News*)
- 15 July 2020, *Bloomberg Law*: Dominion Pipeline Demise Delays Closer Look at Climate Impacts (*Media Mention*)
- 10 July 2020, K&L Gates Energy, Infrastructure and Resources Practice Ranked by The Legal 500 United States 2020 Guide in Eight Categories with 28 Lawyers Recommended (*Rankings & Recognitions*)
- 17 February 2016, K&L Gates Names 50 New Partners (*Press Release*)

## MEDIA MENTIONS

- Quoted, "Energy Dept. Sets Lofty Hydrogen Goal Amid Climate Push," *Energy Law360, Environmental Law360, Project Finance Law360, Public Policy Law360, and Transportation Law360*, 23 April 2021

## AREAS OF FOCUS

- Oil and Gas
- Liquefied Natural Gas
- Power

## EMERGING ISSUES

- Hydrogen
- Sustainable Economy

## REPRESENTATIVE EXPERIENCE

- Negotiate and review contracts for the provision of natural gas and power service to residential customers.
- Assist leading US LNG trade association in drafting reply comments on DOE's 2012 LNG Export Study.
- Assist clients with FERC Form No. 552 for natural gas purchasers and sellers.
- While seconded to compliance department of energy trading company, provided advice to natural gas traders and company on a daily basis concerning a variety of issues including vetting potential projects for FERC compliance issues, assisting company in rep
- Assist crude oil and NGL pipeline operator in Ukraine with drafting form TSA.
- Advise clients on the Pipeline and Hazardous Materials Safety Administration's (PHMSA) Part 192 regulations related to the transportation of natural gas by pipeline.
- Assist project developers and potential customers in jurisdictional analysis for crude oil and natural gas liquids (NGL) pipelines.
- Advise clients on safety regulations under PHMSA, Part 193, applicable to LNG storage facilities and LNG transfer pipelines.
- Advise clients on potential risks and liabilities associated with DOE reporting requirements for LNG exporters and their customers, including DOE penalty authority and commercial risk.
- Advise clients on state registration requirements for natural gas marketers and brokers.
- Represent clients in FERC Section 4, limited Section 4, and Section 5 rate proceedings and proceeding related to the terms and conditions of service on interstate natural gas pipelines.
- Assist clients with LNG import and export issues, including the DOE regulation of imports and exports of LNG, and the FERC regulation of LNG terminal facilities.
- Assist client in participation in FERC hydropower proceeding
- Advise clients on U.S. federal, state and local authorities' roles in the development of energy infrastructure, including pipelines and LNG terminal siting.
- Negotiate renewable natural gas interconnect agreement between utilities and renewable natural gas producers
- Assist clients with interstate natural gas and oil pipelines' operations and policies before the FERC. Negotiate transportation service agreement (TSA) and tariff language for shipper on new-build FERC-jurisdictional crude oil pipeline.
- Perform due diligence related to sales of natural gas trading books, including review of key commercial provisions, verification of compliance with Federal Energy Regulatory Commission's (FERC) regulations and policies, and submission of application for and receipt of waiver of FERC's tying prohibition to effectuate the sales.

- Advise clients on PHMSA Part 195 regulations applicable to the transportation of hazardous liquids by pipeline.
- Assist major US LNG trade association in drafting comments on DOE's May 2017 review of its regulatory requirements applicable to LNG exports.
- Negotiate commercial agreements for natural gas marketers, producers, liquefied natural gas (LNG) exporters, and utilities to facilitate transportation of new unconventional natural gas supply to consuming markets including NAESB natural gas supply agreements, pipeline service agreements, precedent agreements, interconnect agreements, and asset management arrangements (AMA).
- Represent clients in FERC Section 7 proceedings for authorization for construction of new interstate natural gas pipeline facilities. Provide strategic advice to LNG project terminal developers on issues of interagency coordination including FERC, PHMSA, EPA, OSHA, and FAA.