

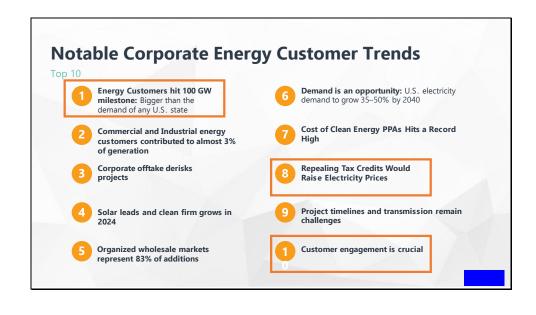
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Agenda OBJECTIVE Introduce CEBA and highlight services and information that will support the mission of this community Update attendees on recent milestones in both the clean energy market broadly as well as the US policy landscape Policy Landscape Updates

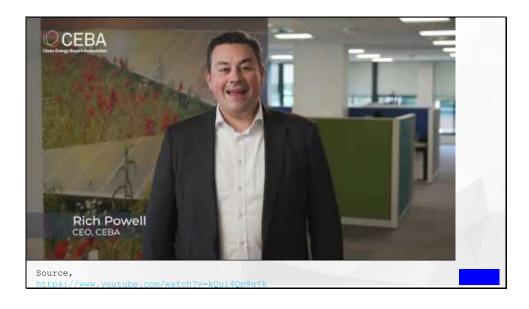


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Clean Energy Tax Incentives

☐ Technology Neutral Tax Credits

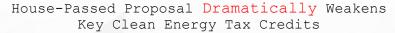
- §45Y Tech Neutral Production Tax Credit (PTC): \$25/MWh (increasing with inflation) for 10 years.
- §48E Tech Neutral Investment Tax Credit (ITC): 30% of CapEx at COD (includes stand-alone energy storage).
- <u>Fine Print:</u> Requires paying "prevailing wage" and apprenticeship hours; eligible for additional bonus adders if meeting certain conditions.

☐ Other Clean Energy Tax Credits:

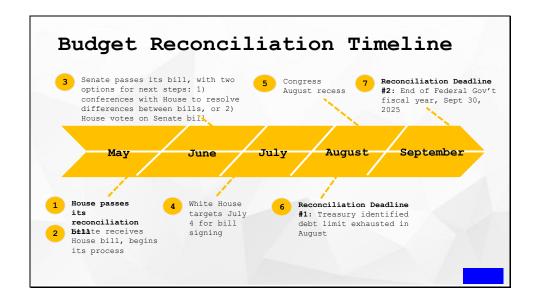
- Existing nuclear (§45U)
- Carbon capture and storage (§45Q)
- Clean hydrogen (§45V)
- Clean energy manufacturing (§45X)



The Latest on Federal Tax Reform, CEBA Research and Tax Credit Defense



- Proposal retains prevailing wage and apprenticeship requirements; bonus adders for domestic content and energy communities; and direct pay
- BUT introduces major roadblocks:
 - 1. Complex FEOC restrictions required starting Dec 31, 2025, applicable to all tax credits and applies (via definition #4) to "any component, subcomponent, or applicable critical mineral ... and any design of such property which is based on any copyright or patent held by a [FEOC]" in sum, makes compliance unworkable
 - 2. Terminates 45Y & 48E tax credits starting January 1, 2029
 - To preserve eligibility facilities <u>must</u> 1) begin construction no later than 60 days from enactment of the bill and 2) be placed-in-service before January 1, 2029
 - Advanced nuclear and nuclear expansions are exempt from the placed-in-service deadline but must begin construction before January 1, 2029
 - 3. Transferability protected for 45Y and 48E projects adhering to begin construction and placed-in-service requirements
- Section 45X advanced manufacturing credit also hit:
 - Credits for wind components ends in 2027, all others by 2031
 - Transferability repealed after 2027
- · Waiting for new Treasury Guidance will stall project development





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