

# Consulting Throughout the Alternative Energy Lifecycle

Lifecycle Stage	Lifecycle Goals	Capabilities	Experience & Results
<b>PLANNING &amp; FEASIBILITY</b>	<b>WTAS works with developers, owners, and users to analyze proposed structures and investments to identify and maximize federal and state income tax advantages and incentives.</b>	Federal and state structural income tax planning and analysis of current and proposed legislation impacting alternative energy including assistance with preliminary financial modeling and the initial evaluation of various compensatory arrangements for managers.	<ul style="list-style-type: none"> <li>Assisted in the economic modeling of large (2MW) solar panel project including the Section 48 credit and the related basis adjustment, bonus depreciation, and state-specific solar energy credits. WTAS drafted state rulings for the state specific solar energy credits.</li> <li>Assisted the preliminary evaluation of a geothermal heat pump installation project eligible for the Section 48 credit and the availability of state credits or incentives.</li> <li>Consulted on the potential income tax issues associated with developing a trading operation in renewable energy credits or "RECs."</li> <li>Assisted in the evaluation of structural alternatives for investing in a solar energy project in Eastern Europe as a "flow-through" or corporate structure, factoring the existence of local tax incentives, the prospect for add-on acquisitions of additional installed capacity, the potential for outside investors (US and foreign), and likely exit strategies.</li> </ul>
<b>DEVELOPMENT</b>	<b>WTAS assists in the development of the project including fine-tuning and updating the various federal and state income tax components supporting the proposed operating model.</b>	Assistance with fine-tuning federal and state income tax structural considerations, tax-related input on development and negotiation of various agreements (e.g. partnership or LLC agreement, compensation structure-related documents, etc.), and potential pursuit of relevant federal or state income tax rulings.	<ul style="list-style-type: none"> <li>Assisted in resolving a number of technical issues in recent tax legislation such as: changes to private activity bond financing as it relates to financing of projects eligible for the Section 48 credit, basis issues related to the cash grant in lieu of Section 48 credit, and the tax treatment of state grants to private/public projects under the federal Stimulus Bill.</li> <li>Designed equity compensation arrangements for a start-up solar energy company.</li> <li>Obtained a tax ruling that resulted in a \$2.5M increase in a state income tax credit for a solar installation at a large distribution facility.</li> <li>Assisted several clients navigate issues related to the 30 percent Section 48 credit, the Section 45 production credit, and the accelerated amortization deduction under Section 179D.</li> </ul>
<b>COMMERCIAL OPERATIONS</b>	<b>WTAS teams with the owners/users to secure the established federal and state income tax structure and investment goals, and monitors the operational landscape to identify ongoing opportunities and potential issues.</b>	Ongoing federal and state income tax compliance and consulting and accounting for income tax services. Valuation services for compensation-related arrangements (e.g., Section 409A), for financial reporting purposes and for alternative energy-focused venture or hedge funds.	<ul style="list-style-type: none"> <li>Assisted solar panel installer in identifying state training incentives and in analyzing significant state income tax issues in an own vs. franchising business model.</li> <li>Assisted a solar panel installer obtain a \$5M sales tax refund and training incentives.</li> <li>Assisted in determining which "soft costs" were properly capitalizable to the solar project for the Section 48 credit, and analysis of the availability of the accelerated amortization deduction under Section 179D, based on the energy savings from the solar project and other energy efficient initiatives undertaken at the facility.</li> <li>Valuation assignment for wind turbine project.</li> </ul>