Tax reform 2025: Impacts to IRA tax credits

December 3, 2025

Craig Lammlin
Managing Director
craig.lammlin@bakertilly.com

At Baker Tilly, we bring a legacy and commitment to helping our clients embrace what's next.

With more than 11,000 professionals from coast to coast and internationally, our resources fuel our ability to offer clients deep industry insights, bold thinking and holistic solutions. Our ranking as the sixth-largest advisory CPA firm* means we're actively shaping the industry landscape across markets.

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11,000+ team members, 1,000+ principals

100+ years in business

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$3B+ firm revenue in 2024

100+ worldwide office locations

300+ workplace and culture awards

Connecting you with the global reach of Baker Tilly International

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$7B+ combined revenue (U.S. dollars)†

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*Expected national ranking after the 2025 Inside Public Accounting (IPA) Top 100 firms report is published
†Based on the 2024 IAB World Survey, adjusted for 2025 revenue rate

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Agenda

- IRA tax credit overview and changes under the OBBBA
- Impacted technologies and timing considerations
- FEOC implications
- Actions to take today

WHAT'S CHANGED?

IRA and OBBBA impacts

Inflation Reduction Act (IRA)

Aug. 16, 2022 signed into law

728 pages

$738 billion in funding

$270 billion for energy incentives in 70 separate energy property types

QUICK OVERVIEW

The One Big Beautiful Bill Act (OB3)

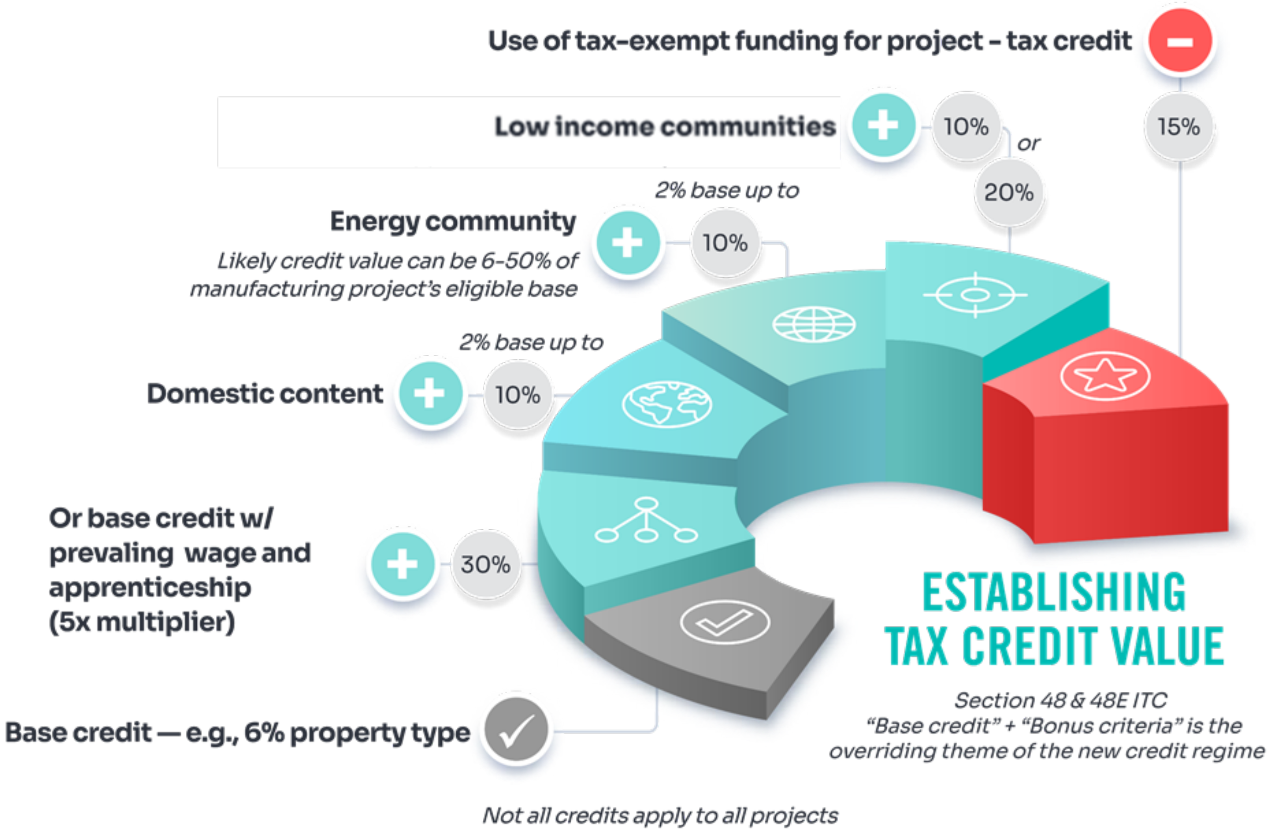
The bill, known as a reconciliation bill, was signed into law on July 4, 2025.

The bill:

- Reduces taxes
- Reduces or increases spending for various federal programs
- Increases the statutory debt limit
- Addresses agencies and programs throughout the federal government

What hasn’t changed?

- Ability to earn up to 50% ITC or equivalent enhanced PTC
- Ability for eligible entities to utilize “direct payment”
- Ability to sell credits via “transferability”



What has changed?

- Timeline and actions required to secure certain credits, specifically solar and wind
- Specific to receipt of credits, utilization of certain foreign sourced/manufactured materials and components, in addition to certain foreign affiliation to projects, has become an “all or nothing” consideration
- Additional modifications to technology “winners” and “losers”
  - “Winners” include energy storage, fuel cells
  - “Losers include clean vehicles/vehicle infrastructure, clean hydrogen
- Legacy IRA programs have had administrative funding reduced or eliminated, and as such (pending future litigation) funding agreements cancelled or delayed
  - Examples: Greenhouse Gas Reduction Fund, DOE Loan Program Office

CREDIT TYPES, TIMING CONSIDERATIONS AND COMPLIANCE

Impacted technologies

Impacts of the OBBBA energy provisions

On July 4, 2026, the President signed H.R. 1 (the "One Big Beautiful Bill Act"), which significantly impacts the availability of federal energy tax credits. Below is a short summary of the biggest changes to 45Y and 48E.

Code section	Prior law	New law
48E: Technology-neutral investment tax credit (ITC)	• Available for 10 years to projects placed in service after 2024, and no statutory sunset	• Terminated for wind and solar facilities that are placed in service after Dec. 31, 2027, unless a project *begins construction* before July 4, 2026 • Must comply with FEOC restrictions after Jan. 1, 2026 • New restriction on third-party leases
45Y: Technology-neutral production tax credit (PTC)	• Available for 10 years to projects placed in service after 2024, and no statutory sunset	• Terminated for wind and solar facilities that are placed in service after Dec. 31, 2027, unless a project *begins construction* before July 4, 2026 • Must comply with FEOC restrictions after January 1, 2026 • New restriction on third-party leases
Multiple Credits: Foreign Entities of Concern (FEOC)	• Section 30D imposed FEOC restrictions on certain materials	• Projects receiving credits under 48E, 45Y and 45X that begin construction in 2026 must comply with FEOC restrictions • No credit is allowed for projects owned/controlled by an SFE. • No credit is allowed for projects that receive "material assistance" from a prohibited foreign entity

Impacts of the OBBBA energy provisions

Code section	Prior law	New law
45V: Clean Hydrogen Production Credit (PTC)	• Terminated for facilities that *begin construction* after Jan. 1, 2033	• Terminated for facilities that ***begin construction*** after **Jan. 1, 2028**
45W: Qualified Commercial Clean Vehicle Credit	• Terminated if acquired after Dec. 31, 2032	• Terminated if **acquired** after **Sept. 30, 2025**
30C: Alternative fuel vehicle refueling property credit	• Terminated if placed in service after Dec. 31, 2032	• Terminated if **placed in service** after **June 30, 2026**

Section 48E/45Y – What's new?

- **Early termination for wind and solar**
  - Wind and solar facilities that begin construction after July 4, 2026, (one year after enactment) are ineligible for the section 48E credit if placed in service after Dec. 31, 2027.
  - Any facility that begins construction before July 4, 2026, is safe harbored from this rule. These projects will have until the end of 2030 to finish construction.

- **Energy Storage Technology ("EST") is qualified for the ITC**
  - EST is not subject to the zero GHG emissions requirements.
  - EST has until the end of 2033 to start construction to qualify for 48E/45Y credits at the full rate.

- **Qualified fuel cells ITC**
  - Fuel cell property is newly eligible for section 48E tax credits.
  - Under the OBBBA, fuel cell property is entitled to the section 48E credit regardless of emissions. This means that fossil fuel based natural gas can be used as fuel and still earn the tax credit.
  - The credit rate is fixed at 30% for section 48E fuel cell property beginning construction after Dec. 31, 2025.
  - Accordingly, fuel cell property beginning construction during 2025 is not credit eligible (unless it is emissions neutral).

Section 48E/45Y – What's new?

- **Nuclear facilities**
  - The OBBBA added a new 10% bonus credit under section 45Y for advanced nuclear facilities located in a metropolitan statistical area that currently has 0.17% or greater direct employment related to the advancement of nuclear power or has had such employment levels at any time after Dec. 31, 2009.

- **FEOC restrictions**
  - Credits are subject to Foreign Entities of Concern (FEOC) rules for new projects beginning construction after Dec. 31, 2025.

- **Phaseout for other technologies**
  - For technologies other than wind and solar, the credit begins to phaseout after 2033:
    - *100% credit for facilities beginning construction during 2033; 75% credit for facilities beginning construction during 2034; 50% credit for facilities beginning construction during 2035; and 0% credit for facilities* ***beginning construction*** *after Dec. 31, 2035*

Section 48E/45Y – What's new?

- **Domestic content considerations**
  - The Act aligns the thresholds for the domestic content bonus credit under the section 48E ITC with the domestic content thresholds under the section 45Y PTC by increasing the section 48E thresholds to match the section 45Y requirements.
    - *40% (20% for an offshore wind facility) if construction began before June 16, 2025;*
    - *45% (27.5% for an offshore wind facility) if construction begins on or after June 16, 2025, and before Jan. 1, 2026;*
    - *50% (35% for an offshore wind facility) if construction begins during the calendar year of 2026; and*
    - *55% if construction begins after Dec. 31, 2026.*

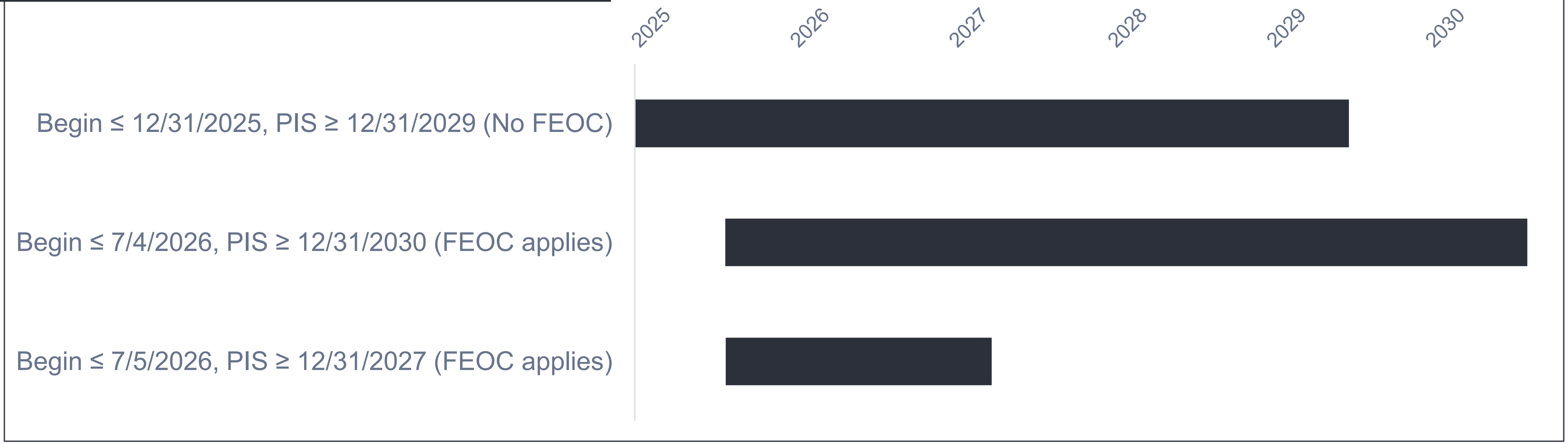
- **What's unchanged?**
  - Tax credit transferability under IRC section 6418 is maintained but transfers to SFEs are prohibited.
  - IRC section 48E and 45Y credit also remains eligible for direct pay under section 6417.
  - Section 48 geothermal heat pump equipment remains but no longer 5-year asset class for depreciation
  - Adders like domestic content, PW&A and energy communities remain the same.

Recent Executive Orders and other directives

- **The July 7, 2025, Executive Order may impact rules related to Beginning of Construction**
  - President Trump directed the Treasury by executive order on July 7, 2025, to issue "new and revised guidance" within 45 days "consistent with applicable law to ensure that policies concerning the 'beginning of construction' are not circumvented, including by preventing the artificial acceleration or manipulation of eligibility and by restricting the use of broad safe harbors unless a substantial portion of a subject facility has been built."
  - The executive order targets solar and wind projects and directs initial guidance related to FEOC to be published in the same timeframe. Notice 2025-42 issued on August 15, 2025, in response. No FEOC yet.

Solar and wind compliance timelines

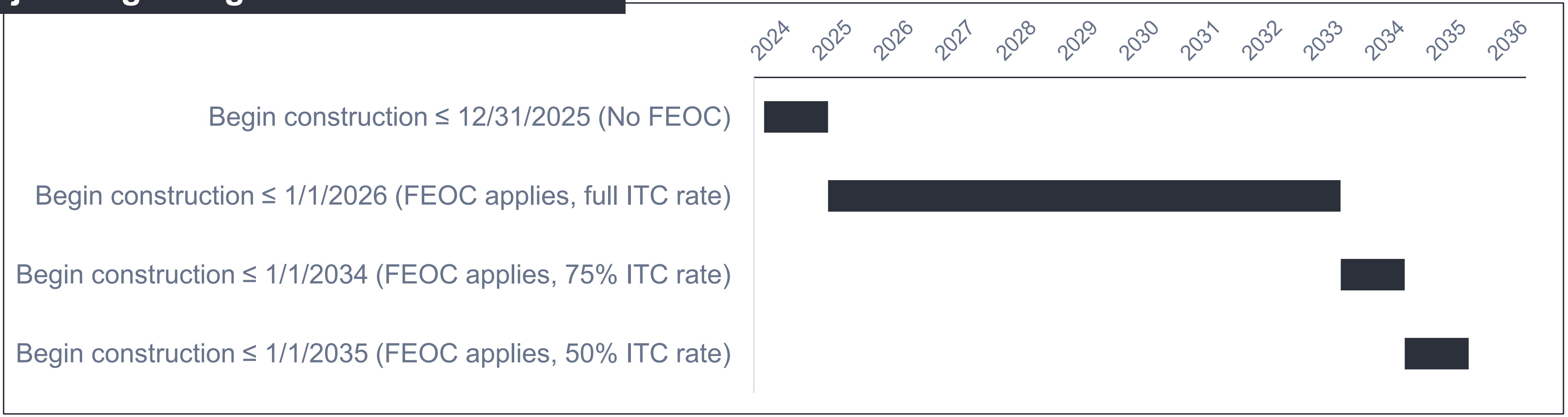
Project beginning construction dates



- Developers have **four calendar years after the year construction starts** under existing and restated Treasury guidance **to finish construction and claim tax credits**.
- Projects beginning construction before Dec. 31, 2025, **do not** have to comply with new FEOC restrictions.
- Projects beginning construction before July 4, 2026, **must** comply with new FEOC restrictions.
- Projects beginning construction **after** July 4, 2026, **must** comply with new FEOC restrictions <u>and</u> place in service before Dec. 31, 2027.

Other technologies under 48E/45Y

Project beginning construction dates



- Energy storage (hydro, ice storage), WERP, fuel cells, and all other types of power projects (i.e., other than solar and wind) have until Dec. 31, 2033, to begin construction for 48E/45Y tax credits at full rate.
- FEOC restrictions apply for projects beginning construction on or after Jan. 1, 2026.
- Such projects that start construction on or after Jan. 1, 2034, will qualify for tax credits at 75% of the full rate, in 2035 at 50% of the full rate, then 0% thereafter.

5% SAFE HARBOR VS PHYSICAL WORK

Beginning of construction strategy

48E/45Y begun construction Notice 2025-42

Notice 2025-42 was released on Aug. 15, 2025, and updated guidance for only **solar and wind projects** beginning construction before Sept 2, 2025.

- **New guidance includes:**
  - Detailed examples of physical work of significant nature
  - 5% safe harbor only allowed for solar projects below 1.5MW
  - Facility grouping available solely for BOC purposes
- No retroactive application: only applies to solar/wind facilities that did not begin construction before Sept 2, 2025
- No changes for other technologies like battery storage, ice storage, hydro storage, geothermal, or fuel cells
- No impact to Continuity of Construction safe harbor: first year + 4 calendar years

5% safe harbor test

To satisfy the 5% safe harbor test, a taxpayer must fulfill two criteria: (1) **Pay or incur** at least 5% of the total eligible costs of the energy property, and (2) subsequently make continuous efforts to complete the energy property. **For solar projects over 1.5 MW, the 5% safe harbor no longer applies for projects beginning construction after Sept 2, 2025.**

- Projects will need to “incur” at least 5% of the total eligible costs of energy property vs simply “pay” based on their tax accounting method
- A deposit made might not qualify for payment
- Definition of incur:
  - Delivery or acceptance of defined product or service
  - Large components can be broken down into separate deliverables – i.e.: conditioning unit skids can be viewed as each individual products to meet the “delivery or acceptance” requirements.
  - 3.5 month rule – products delivered or accepted within 3.5 months of **payment** will be considered “**incurred” as of payment date.**

Dec. 31, 2025 – Make payment under binding written contract

April 15, 2026 – Receive equipment to “incur” by **payment date of Dec. 31, 2025**

BEGUN CONSTRUCTION

Physical work test

- Requires that a taxpayer begin physical work of a **significant nature**, determined by the nature of the work performed, not the amount or cost.
- There is no fixed minimum amount of work or monetary or percentage threshold required to satisfy the physical work test.
- Both on-site and off-site work can demonstrate that physical work of a significant nature has begun.
    - Time-stamped photos, progress pay application, signed letters from manufacturers
- Physical work of a significant nature typically includes activities such as:
    - Constructing foundational support structures that are essential for the operation of the energy-generating equipment;
    - Commencing the manufacture or assembly of the equipment set to convert natural resources into energy;
    - Starting the construction of storage facilities that are critical for housing the energy-generating components.

BEGUN CONSTRUCTION

Physical work test (cont.)

Examples of qualified activities

- Installation of racks or other structures (piled posts) to affix photovoltaic (PV) panels, collectors, or solar cells to a site ***(included in Notice 2025-42 for solar)***
- Installation of a foundation, pad, tower, wiring, setting anchor bolts,or ground mounting systems ***(included in Notice 2025-42 for wind)***
- Installation of collectors, concentrators, tracking systems, bundles of optical fibers, or fixtures within a structure ***(not affected by Notice 2025-42)***
- Installation of components of a fuel cell stack assembly, such as electrodes, gas diffusion layers, membranes, gasketing, or plates ***(not affected by Notice 2025-42)***
- Off-site manufactured custom components (not inventory), mounting equipment, support structures such as racks and rails, inverters, transformers ***(included in Notice 2025-42)***

Beginning of construction implementation plan

The steps detailed below guide through the necessary actions to comply with the beginning of construction requirements outlined in Section 48E and related guidance.

Step 1
Review pipeline of potential projects seeking ITC eligibility. Evaluate project eligibility for ITC safe harbor provisions

→

Step 2
Identify eligible equipment that would meet the begun construction requirements.

→

Step 3
Identify equipment to procure for each project and establish dialogue with vendor on requirements to procure prior to Dec. 31, 2025.

→

Step 4
Enter into a binding written contract(s) as needed to secure eligible equipment. At least 5% of contract price not treated as limiting damages.

→

Step 5
Issue purchase order to vendor / manufacturer for eligible equipment

→

Step 6
Vendor/manufacturer begins work and provides documentation of beginning of construction work and of completion of work prior to Dec. 31, 2025.

→

Step 7
Baker Tilly to produce tax memorandum substantiating that requirements were met to support ITC eligibility.

IT’S COMPLEX

FEOC implications

Foreign Entities of Concern (FEOC)

The IRA formerly applied FEOC restrictions to just the 30D clean vehicle credit. As defined in the IRA, a FEOC was an entity that met *any* of the following criteria:

- A designated foreign terrorist organization;
- Included on the Specifically Designated Nationals and Blocked Persons List;
- Owned by, controlled by, or subject to the jurisdiction or direction of a foreign government;
- Involved in criminal activity under various U.S. national security laws; or
- Engaged in conduct detrimental to U.S. national security or foreign policy.

The OBBB expands upon the IRA's FEOC definition and creates two new FEOC categories:

1. Specified Foreign Entities, and
2. Foreign Influenced Entities.

Both categories are considered Prohibited Foreign Entities ("PFEs"). Any PFE is a FEOC.

- New FEOC rules take effect in tax years beginning after July 4, 2025.

Prohibited foreign entities

Specified Foreign Entity (SFE)

An SFE is *any* of the following:

- Chinese military companies;
- An entity that is subject to Uyghur Forced Labor Prevention Act restrictions;
- An entity that is ineligible for Department of Defense contracts;
- An entity under the control of China, Russia, North Korea, or Iran, including any citizens of those countries or an entity controlled by another entity where more than 50% of the stock, 50% of the profit or capital interests, or 50% of the beneficial interest lies with a government, individual, or business of China, Russia, North Korea or Iran.

Foreign Influenced Entity (FIE)

An FIE is an entity over which an SFE exercises influence, meeting *any* of the following criteria:

- Can directly or indirectly appoint a senior/covered officer
- Has 25% ownership over the entity
- Owns, in the aggregate, alongside other Specified Foreign Entities at least 40% of the entity
- Holds, in the aggregate, at least 40% of the debt of the entity
- Made a payment to a SFE that allows it to exercise “effective control” over a qualified facility under 48E/45Y, energy storage technology, or eligible component under 45X.

Four FEOC restrictions to remember

A project or company may not be entitled to a credit if it…

1. **Claims or purchases a credit while itself qualifying as a PFE**
   45Y, 48E, 45X, 45U, 45Q, and 45Z

2. **Sources components from a PFE beyond an allowed "material assistance cost ratio"**
   45Y, 48E, 45X

3. **Licenses technology from a PFE**
   45Y, 48E, 45X

4. **Engages in significant financial arrangements (payments, loans, royalties, etc.) with a PFE**
   45Y, 48E, 45X

Material assistance cost ratios (45Y, 48E, 45X)

- A project would be ineligible to receive credits if a certain percentage of the value of the components in a project are sourced from a PFE. These percentage thresholds, known as **material assistance cost ratios**, vary between tax credits and types of components being sourced.
- Applies to projects beginning construction after 2025, components sold after 2025.
- **Certifications are required** to verify that components supplied to the taxpayer were not produced by a PFE. Suppliers who issue false or misleading certifications face fines from the IRS.
- Whether a project benefited from material assistance is determined by using a formula:

$$MACR = \left(\frac{T - P}{T}\right) \times 100\%$$

- MACR = Material assistance cost ratio
- T = Total cost of all manufactured products
- P = Total cost of all manufactured products from a PFE

Material assistance cost ratios (45Y, 48E, 45X)

The OBBBA phases in material assistance restrictions. Percentage thresholds and phase-in timelines vary depending on the technology. For example:

- Qualified facilities lose eligibility if the ratio falls below 40% in 2026, rising 5 percentage points each year until 2030. Energy storage projects lose eligibility if the ratio falls below 55% in 2026, rising 5 percentage points each year until 2030.
- 45X manufacturing credit: solar components must clear 50% in 2026 (rising to 85% by 2030); wind components must clear 85% in 2026, and then 90% in 2027; battery components start at 60% in 2026 and step up 5 points per year.

Year	48E/45Y (Qualified Facilities)	48E/45Y (Energy Storage)	Solar components (45X)	Wind components (45X)	Inverters (45X)	Battery components (45X)	Critical minerals (45X)
2026	40%	55%	50%	85%	50%	60%	0%
2027	45%	60%	60%	90%	55%	65%	0%
2028	50%	65%	70%	-	60%	70%	0%
2029	55%	70%	80%	-	65%	80%	0%
2030	60%	75%	85%	-	70%	85%	25%
2031	60%	75%	85%	-	70%	85%	30%
2032	60%	75%	85%	-	70%	85%	40%
After 2032	60%	75%	85%	-	70%	85%	50%

Other FEOC rules – “effective control”

- **Licensing agreement restrictions**
  - New restrictions on any component or applicable critical mineral produced using technology that was licensed from a PFE if the licensing agreement allows a PFE **“effective control**.**”**
  - **“Effective control”** is a contract or licensing agreement that allows a foreign party to exert influence over the production of components, generation, or storage.
  - Any licensing agreement with an **SFE** signed after July 4, 2025, is automatically treated as giving the SFE “effective control”; prior agreements are exempt.
  - The bill directs the Treasury Department to issue further guidance defining “effective control.”
- **Payments to SFEs**
  - If a technology-neutral ITC is claimed on a project, the full ITC would have to be repaid **if the taxpayer makes payments under contracts or technology licenses** that give an SFE “effective control” over the taxpayer or a project.
  - Any such payment **in any of the next 10 years after a project is placed in service** would trigger recapture.
  - This recapture provision would apply to ITCs claimed in tax years starting two years after July 4, 2025.

GO THERE. START HERE.

Actions to take today

Considerations for the next 10 months

- Begun construction:
  - Dec. 31, 2025, is key to avoid dealing w/ FEOC
  - July 4, 2026, is key to secure solar/wind credits
- FEOC: synthesize a plan based on your situation and information available from Treasury at time actions are taken
- Stakeholder group: assume they don’t know/they are figuring it out along with you
  - Manufacturers/supply chain
  - Lenders
  - Tax investors
- The “new” IRA compliance provisions have taught us – early engagement prevents late and unpleasant surprises

Questions?

WHO WE ARE

About Us

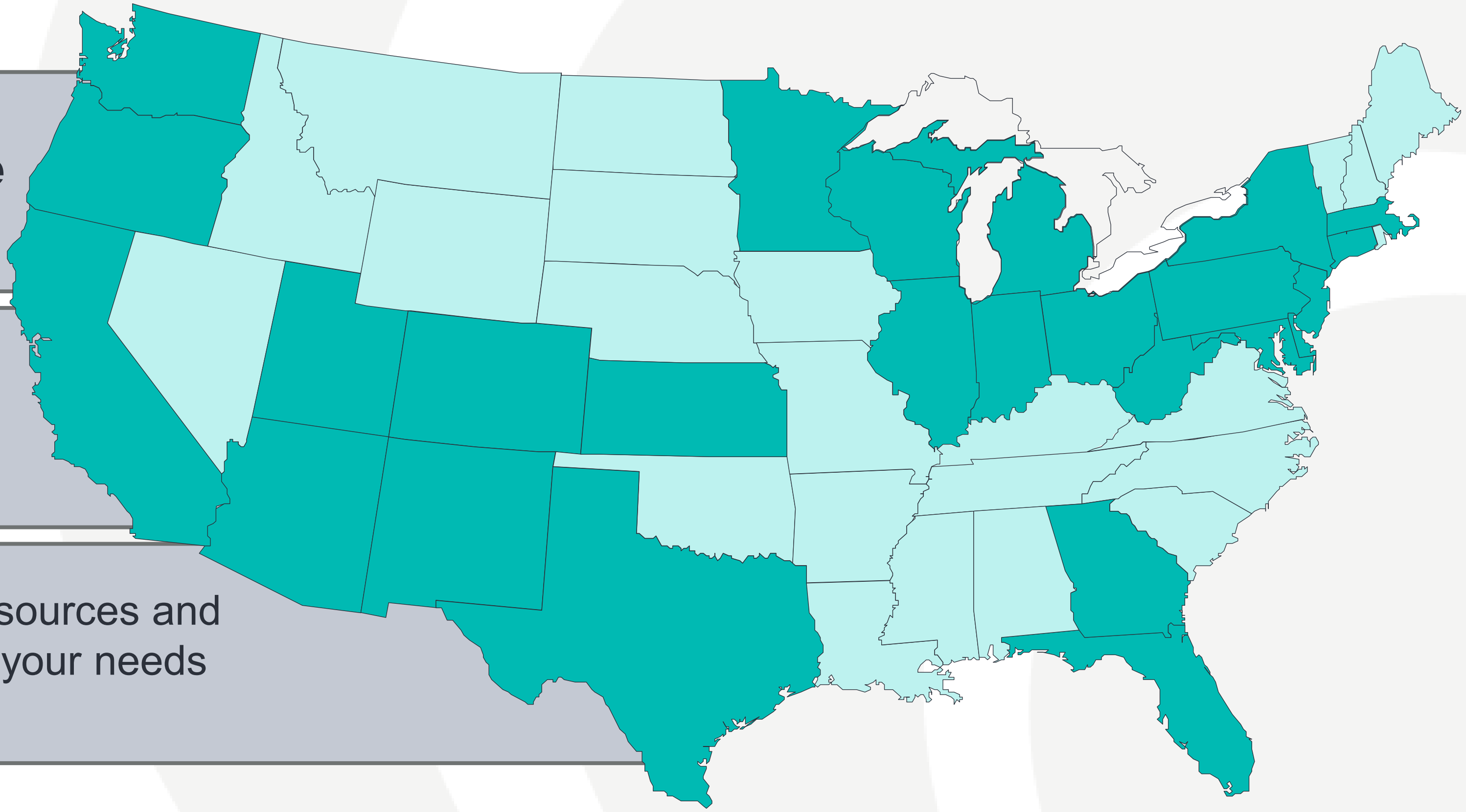
Our offices

We started by planting strong roots more than a century ago. From there, we never stopped growing. Since our founding, we have grown to encompass 75 different business combinations, each with its own rich history. We have augmented our scope industries, services and areas of expertise to better serve our clients. And we have expanded our reach from coast to coast and around the globe.

100+ worldwide offices

25 states and nine countries

Our local offices, coast-to-coast resources and international reach mean we meet your needs now and into the future.



A well-balanced organization

Advisory

Our consulting services combine deep functional, industry and technical experience, delivered within a flexible engagement model to assist in solving your toughest enterprise challenges. We work with you to tailor our methodologies and develop real solutions to further your success.

Tax

In addition to traditional tax planning and compliance, we offer a wide range of highly specialized services, including international tax, state and local tax, tax advocacy and controversy services, research and development credits and cost segregation.

Assurance

Our highly collaborative professionals draw on industry and service expertise to best meet each client's unique situation. Working with tax-informed auditors and hands-on partners, your organization will receive valuable insight and quick resolution to any technical issues that may arise. Assurance services are delivered by Baker Tilly US, LLP.

ALLIANCE
FOR TRIBAL CLEAN ENERGY

Supporting the Self-Determined Pursuit of Tribal Energy Sovereignty

Todd Halvorsen, Head of Energy Finance & Structuring

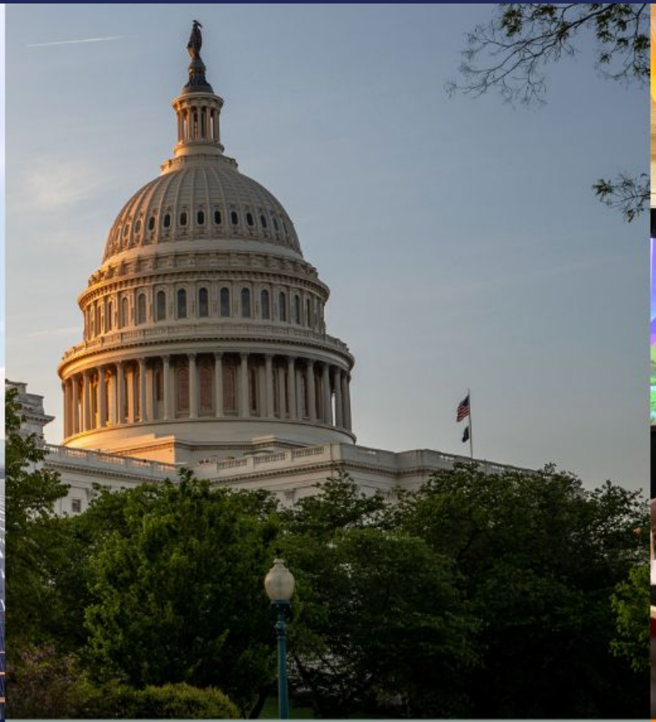
Who we are

The Alliance is a 501(c)(3) nonprofit organization founded in 2016 by Chéri Smith *(Mi'kmaq Descendant)*, a clean energy veteran with more than 25 years of experience leading both public and private renewable energy development, policy, finance, workforce, and education initiatives.

Our highly qualified in-house team includes Indigenous and non-Indigenous subject matter experts in engineering, finance, law, installation, operations and maintenance, workforce development, and more.

Alliance Four Key Pillars

TECHNICAL ASSISTANCE & PROJECT FINANCE



ENERGY POLICY & GOVERNMENT RELATIONS

INFORMATION RESOURCES & EVENTS

EDUCATION & WORKFORCE DEVELOPMENT

The Alliance Weaver Platform℠

A comprehensive, pro bono suite of financial tools and services developed by the Alliance for Tribal Clean Energy to help Tribal communities plan, finance, and operate clean energy projects.

- The **Weaver Model℠** and **Weaver Lite℠** for financial modeling
- A growing **Template Document Library**
- Strategic support for **Renewable Energy Credit (REC)** and **Carbon Reduction Unit (CRU)** marketing
- **Investment Tax Credit (ITC)** monetization, structuring and investor matchmaking

These services are provided at no cost to Tribes.

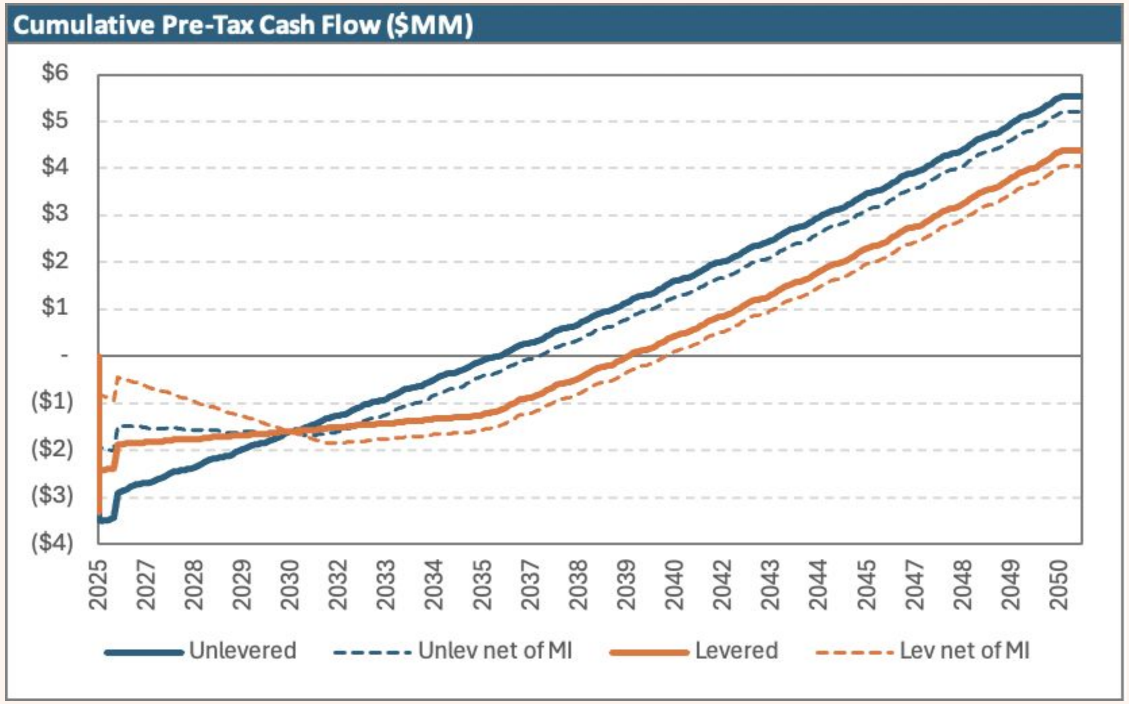
Weaver Model℠ Overview

The Weaver Model℠ is a multifunctional financial forecasting and planning tool designed for:

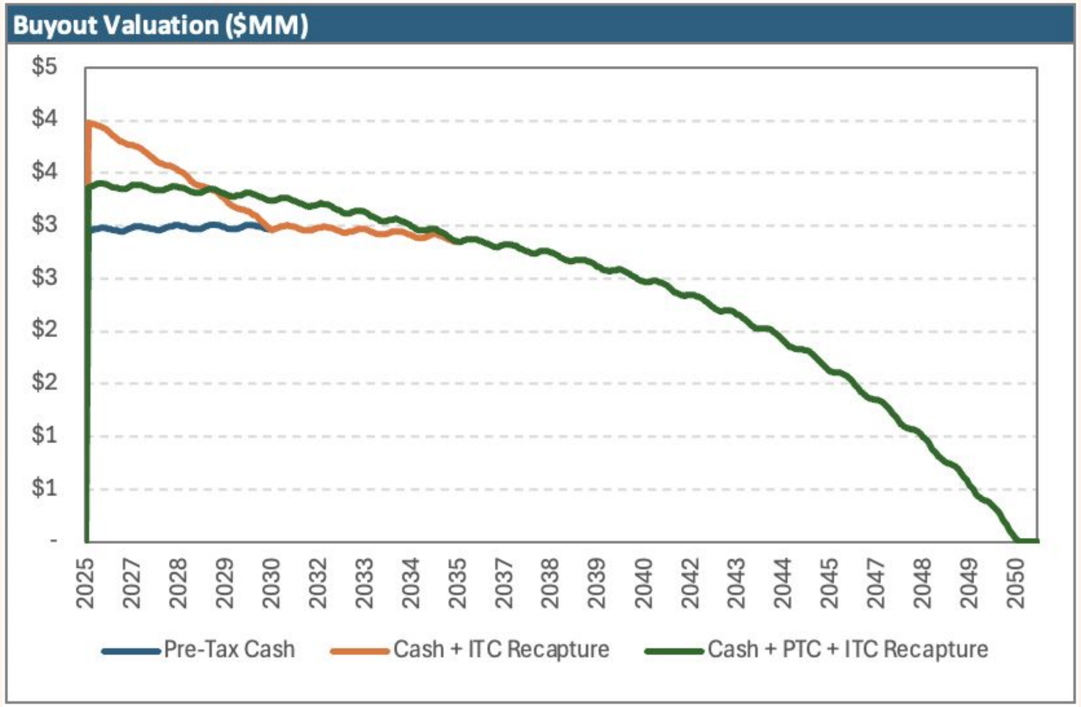
- Integrity and transparency
- Discounted cash flow analysis
- Solar, Wind, and Battery Storage projects and the ability to incorporate other technologies
- Partnership and debt financing
- Investment Tax Credit (ITC) strategy and lending products
- High-level or detailed forecasts (pro forma), budgeting, and sensitivity analysis
- Investment-grade financial statements
- Templates for populating energy contract schedules and exhibits

Example Weaver Model℠ Analytics

Cash Flow Forecasting



Buyout Valuations



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The Weaver Model℠ is not…

- A tool for analyzing utility billing data
- An "avoided cost" or energy savings calculator
- A "black box" or cloud based tool
- An easy tool to pick up right away and put to use — training is required
- To be relied upon without functional expert input "sign-off"
    - "Garbage in, garbage out"

Template Document Library

The **Template Document Library (TDL)** is an open-source collection of legal and financial documents developed by leading clean energy transaction attorneys and Tribal legal experts. Documents include:

- Power Purchase Agreements (PPAs) with Site License
- Construction and Term Credit Agreements
- Renewable Energy Credit Purchase Agreements
- Operation and Maintenance Agreements

The **TDL** is designed to:

- Save Tribes significant legal fees
- Accelerate contracting and financing timelines
- Support broader adoption by Native CDFIs and financial partners, enabling capital pooling and portfolio development

REC & CRU Market Strategy

Securing environmental attribute purchase agreements with investment-grade entities can build cash flow confidence that supports construction and term financing.

Environmental attributes include, but are not limited to, Renewable Energy Credits (RECs) and Carbon Credits such as Carbon Reduction Units (CRUs). The Alliance can support with:

- Solve for price and/or term of RECs and CRUs to help close finance gaps
- Creation of Confidential Information Memorandum (CIMs) for Tribal projects
- Buyer screening and introduction support
- Transparent compliance framework that prioritizes **Tribal data sovereignty**
- Transaction costs borne by the buyer

Investment Tax Credit (ITC) Strategy & Marketing

In addition to providing Elective Pay support services, the Alliance helps Tribes access alternative ITC monetization pathways through partnerships with top ITC marketers, advisors, and counsel:

- Identify values-aligned **ITC buyers or investors**
- Navigate **ITC transfers** for non-taxable entities
- Structure direct investment opportunities that leverage ITC and depreciation benefits — e.g., sale leasebacks & partnership flips

Additional Finance & Analytics Support

- Capital stack planning
- Developer proposal review
- Commercial terms contract review
- Partnership structuring support
- Construction, term, and convertible loan modeling, sourcing and selection support
- Risk assessment and recommendations
- Coordination with the Indigenous Power and Light Fund

ALLIANCE FOR TRIBAL CLEAN ENERGY

Indigenous Power & Light Fund for Energy Sovereignty

- $100M catalytic pool of philanthropic funding spearheaded by the Alliance with Founding Partners — MacArthur Foundation, the Hewlett Foundation, the Lemelson Foundation, and Invest in Our Future Fund. $35M committed, thus far.
- More important now with the current political climate and tax credit rescissions.
- Supports Tribes in asserting their sovereignty and achieving maximum ownership of clean energy projects on their lands.
- Vital bridge between Native American Tribes and the energy freedom they rightfully deserve.

The Fund's Main Objective

Facilitate extensive pre-development work, transitioning projects from conceptual stages to well-defined initiatives poised for development.

The Fund also will support essential activities, including:

- Tribal engagement, education, consensus-building and trust-building
- Support for Tribal goal setting and aligning goals to project scope
- Structuring of myriad financial transactions required for project development
- Facilitation of engagement with federal granting/lending agencies
- Capacity-building, including Tribal leadership and vocational training
- Long-term workforce development and planning

Current Offerings

GRANTS

- Up to $500,000

Grant Purpose

- Pre-Development funding
- Match funding
- Construction
- Gap funding
- Equity

GRANTS

- Up to $1,000,000

Loan Purpose

- Construction
- Working Capital
- Equipment
- Gap funding
- Bridge
- Equity

Wela'lioq! (Thank You!)

ALLIANCE FOR TRIBAL CLEAN ENERGY

Connect with us!

Finance@tribalcleanenergy.org

@tribalcleanenergy

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AllianceforTribalCleanEnergy

tribalcleanenergy.org

Tribal & Regional Clean Energy Finance

Expert Session for Economic Development & Finance Working Group

December 3rd, 2025 / Virtual Session

Today's Session Format

01

Welcome & Introductions

Brief opening remarks and panelist introductions

02

Expert Presentations

Insights on tribal clean energy finance, tax incentives, and regional energy programs

03

Interactive Q&A

Open discussion with audience questions and expert responses

RGS REGIONAL GOVERNMENT SERVICES

Key Discussion Topics

Tribal Clean Energy Finance

Structuring deals and demystifying project finance complexity for Tribal communities

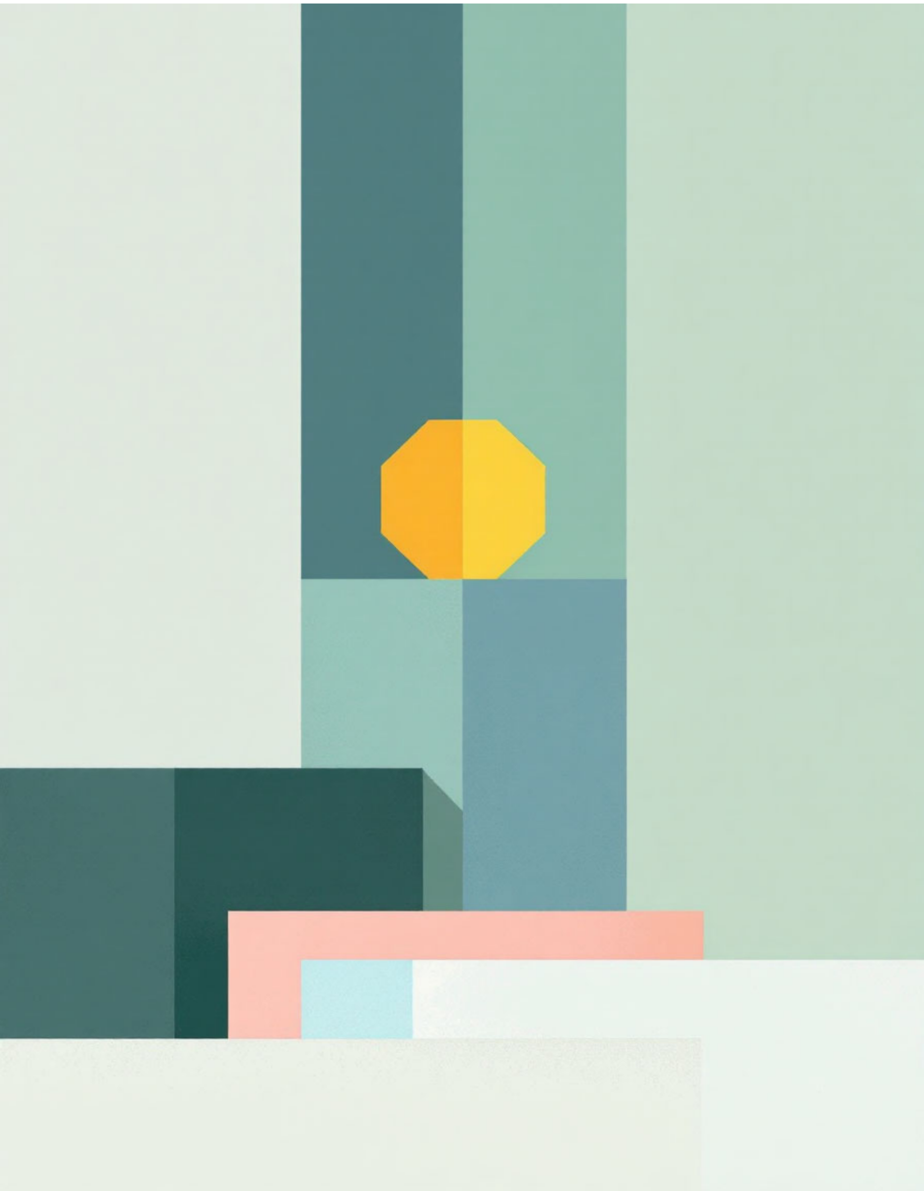
Credits & Incentives

Navigating federal and state tax credits, economic development incentives, and funding opportunities

Regional Coordination

Building partnerships and leveraging resources across rural and regional energy networks

RGS REGIONAL GOVERNMENT SERVICES



Meet Our Panelists

Three leading experts bringing unique perspectives on clean energy finance, tribal energy solutions, and regional coordination.

Todd Halvorsen

Head of Energy Finance & Structuring

Alliance for Tribal Clean Energy

Background: Seven years teaching science on the Navajo Nation before joining the climate-tech industry in 2007. Led analytics teams supporting development and finance, helping grow a solar startup into an industry leader acquired by NRG Energy.

Expertise: Project finance, deal structuring, and comprehensive energy solutions for Tribal communities. Successfully facilitated construction of hundreds of renewable projects representing over $1B in total investment.

Education: B.S. and M.S. from Indiana University in environmental science and education for sustainability.

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Craig Lammlin

Managing Director

Baker Tilly

Experience: Over 20 years in public accounting specializing in credits and incentives. Previously managed a credits and incentives consulting practice at a Big Four firm.

Specialization: Advisory services for clean energy projects, focusing on statutory and discretionary tax credits, economic development incentives, job creation, capital investment, and multistate opportunities.

Industries Served: Clean energy, technology, manufacturing, telecommunications, and media clients across diverse sectors.

Military Service: US Army veteran who served in Iraq and Afghanistan.

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Rich Felice

Senior Energy Program Specialist

Mendocino Council of Governments / Northern Rural Energy Network

Experience: As the Senior Energy Program Specialist on behalf of the Mendocino Council of Governments, Rich has spent most of 2025 helping to develop and implement a range of energy efficiency programs in the Northern Rural Energy Network portfolio that are targeted at the Hard-to-Reach communities of Mendocino County alongside local colleagues and partner agencies representing Humboldt, Lake and 14 Sierra region counties.

Education: With a Master of Science degree in Environmental Policy and Management, he brings a deep appreciation for tribal stewardship of natural resources and a passion for common-sense expansion of renewable energy to the table.

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Why This Matters

Clean energy projects represent transformative opportunities for Tribal and rural communities—delivering energy independence, economic development, and environmental stewardship. However, navigating the complex landscape of project finance, tax incentives, and regional resources requires specialized expertise.

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Let's Get Started

Join the Conversation

We're excited to explore the opportunities and challenges in tribal and regional clean energy finance. Your questions and participation will help make this discussion valuable for everyone.

Northern Rural Energy Network

Uplifting rural communities in Northern California

Presented by
Rich Felice, Senior Energy Program Specialist
Mendocino Council of Governments

December 3rd 2025

Who We Are

The Northern Rural Energy Network (NREN) is a Regional Energy Network authorized by the CPUC to serve hard-to-reach rural communities in Northern California. We fill service gaps left by traditional energy efficiency programs.

Our Partners:

- Redwood Coast Energy Authority (Lead)
- Sierra Business Council
- Mendocino Council of Governments
- Lake Area Planning Council

Mission and Vision

OUR MISSION

To offer energy efficiency programs to hard-to-reach rural communities, delivering cost savings and strengthening community resilience.

OUR VISION

“By Rural, For Rural”

Empowering hard-to-reach communities with tools and knowledge to make informed, cost-effective
energy decisions.

01

Residential Services

Residential Services

Available Now!

Energy Efficiency Kits

We provide no-cost kits (valued at $100), mailed directly to your home or picked up at outreach events. Kits include LED bulbs, an advanced power strip, energy use meters, and weatherization tools.

Home Energy Assessments

Access FREE, phone-based home energy assessments. Our trained energy assessors identify inefficiencies in your home and suggest tailored upgrades to save energy and money.

02

Rebates

Rebates

Available Now!

We offer substantial financial incentives to help folks upgrade:

- Kitchen Appliances
- Laundry Equipment
- Home Ventilation
- Room Air Conditioning
- Heat Pump Space Heaters
- Air Filtration Units
- Heat Pump Water Heaters

03

Commercial Resource Acquisition

Commercial Resource Acquisition

Coming in 2026!

We are currently developing our Commercial Resource Acquisition program, aimed at providing financial incentives to micro-medium sized businesses for:

- Lighting
- Heat Pump Water Heaters

And we hope to expand these offerings to include HVAC projects in late 2026.

04

Public Equity

Public Equity

Coming in 2026!

Our Public Equity program will be targeted at providing energy efficiency expertise to public entities, including tribal governments, throughout northern California, offering:

- Energy Audits/Assessments for public facilities
- Technical support for energy efficiency upgrades
- Assistance accessing grants/funding

05

Workforce Education And Training

Workforce Education & Training

Coming in 2026!

We are currently designing our Workforce Education & Training program to begin in 2026 by connecting current professionals to existing training programs throughout Northern California.

By 2028, we hope to uplift hard-to-reach communities in our territories through NREN-designed training and job-placement programs in collaboration with local Community-Based Organizations, educational institutions and more.

Our Role in Renewable Energy Expansion and Economic Advancement in the Redwood Rise Region

Energy efficiency programs are an essential component of expanding renewable energy developments, drawing down demand to help solar, wind and geothermal sources supply a greater percentage of energy use and provide grid resilience.

At NREN, we aim to provide economic benefits directly to hard-to-reach and historically disadvantaged communities. We do this with financial incentives for energy efficiency upgrades as well as empowering non-residential entities and prospective and current professionals to make energy-wise decisions.

Thank You

Contact the NREN Team in Mendocino

Orion Walker, Energy Program Manager
walkero@dow-associates.com

Rich Felice, Senior Energy Program Specialist (presenter)
felicer@dow-associates.com