Troutman Sanders Announces 2014 Tax Seminars

March 5, 2014

Troutman Sanders is pleased to announce the 2014 Troutman Sanders LLP Tax Seminars focusing on public utilities and electric energy producers.

Each seminar will contain an intensive discussion of federal income tax issues your company will face in preparing its 2013 tax returns, audit issues being raised by the Internal Revenue Service and other current issues. Attendees will receive a 200+ page coursebook addressing tax issues important to regulated companies. (Attached is the table of contents.)

Important issues to be highlighted this year will include:

- Capital vs. repair
- Renewable energy credits under Code sections 45 and 48
- Penalties
- Bonus depreciation

CPE Credit: This seminar has been registered with the National Association of State Boards of Accountancy.* Each attendee will receive seven hours of CPE credit.

Speakers: David Jacobson, Howard Cooper and Amie Broder will conduct each session. The speakers are members of Troutman Sanders' utility tax practice, which is considered a leading practice on taxation of electric companies.

Cost: The charge for the entire program for the first and second attendee from the same company is \$625 per person, the third and fourth attendee from the same company is \$525 per person, and additional attendees from the same company is \$425 per person. (Lunch is included.)

Please contact us directly if you are interested in having an on-site seminar.

How to Register: Please contact Kathy Page, 202-274-2812 or <u>katharine.page@troutmansanders.com</u>, or Elisabeth Fraley, 202-274-2813 or <u>elisabeth.fraley@troutmansanders.com</u>, if you or others from your company plan to attend or for more information regarding refund, complaint and/or program cancellation policies. Please contact either Dave Jacobson, 202-274-2914 or <u>david.jacobson@troutmansanders.com</u>, or Howard Cooper, 202-274-2878 or <u>howard.cooper@troutmansanders.com</u>, if you have any questions.

Program Level: Overview

Delivery Method: Group-Live

Prerequisites: Work experience on tax issues involving the electric or gas industry

The presentation begins at 9:00 a.m. and ends at 4:30 p.m., and will be held in the following locations:

Washington, DC Thursday, May 8

Troutman Sanders LLP 401 9th Street, N.W., 10th Floor Washington, DC 20004 Chicago, IL Thursday, May 15

Troutman Sanders LLP 55 West Monroe Street, 30th Floor Chicago, IL 60603



*Troutman Sanders LLP is registered with the National Association of State Boards of Accountancy (NASBA) as a sponsor of continuing professional education on the National Registry of CPE Sponsors. State boards of accountancy have final authority on the acceptance of individual courses for CPE credit. Complaints regarding registered sponsors may be submitted to the National Registry of CPE Sponsors through its website: www.learningmarket.org.





TROUTMAN SANDERS

David Jacobson, Partner. David's practice focuses on representing utility industry clients. He addresses IRS audit and appeals issues, secures private letter rulings, technical advice memoranda and permission to change methods of accounting from the National Office of the IRS and participates in tax litigation, tax planning and the structuring and evaluation of proposed transactions. He provides tax return review services to a large number of utility clients advising these companies regarding the appropriate positions to be reflected on income tax returns. David has served as an expert witness on tax matters in utility rate cases. In addition, he represents clients with respect to legislative and tax policy matters emanating from Capitol Hill, the IRS and the Department of Treasury. David's knowledge and facility in this area is, at least in part, a function of his prior experience as tax counsel to the Senate Finance Committee and as attorney advisor in the office of chief counsel of the IRS.



Howard Cooper, Partner. Howard advises electric utilities and other energy companies on a wide range of tax matters. This assistance includes controversy work against the IRS, providing tax-related planning advice to large corporate clients, and helping clients obtain the benefits of various tax incentives related to energy matters, including production tax credits, investment tax credits, section 1603 grants and accelerated depreciation (including bonus depreciation). Howard is the editor of the Washington Developments Tax Service by which the firm advises companies from all segments of the utility industry on emerging legislative, administrative and judicial developments of particular relevance to electric companies. Howard also advises the Edison Electric Institute and electric utilities on legislative and regulatory matters and has been very involved in advising the industry on issues relating to electric energy tax legislation.



Amie Broder, Associate. Amie advises electric utilities and other energy companies on a wide range of tax matters, including tax issues relating to abandonments of power plants, deduction versus capitalization issues, and sale leasebacks of renewable energy facilities. Amie also advises clients in a number of other industries on other businessrelated tax matters and transactions, including mergers and acquisitions, cross-border investments and operations, securities offerings, corporate finance, partnership and other pass-through entity issues, and FATCA compliance.



Table of Contents

- I. General Review Items
- II. Special Entity (Partnership/Joint Venture) Items
- III. Methods of Accounting and Economic Substance
- IV. Income Items
- V. Expenses and Deductions (Other than Depreciation, Cost Recovery and Amortization)
- VI. Capitalization, Depreciation, Amortization and Other Cost Recovery Rules
- VII. Disclosure, Reporting and Penalties
- VIII. Credits
- IX. Carryback/Carryover Items
- X. Estimated Tax, Refunds and Interest Netting
- XI. Audit and Procedural Issues