



March 2024

Inflation Reduction Act Elective Pay Final Rule Update

Ground Rules: Disclaimer

- This deck provides an overview of certain Inflation Reduction Act tax provisions for general informational purposes only and **is not itself tax guidance**.
- The content in this presentation is based on tax guidance on IRS.gov.
- This deck relies on simplifications and generalizations to convey high-level points about Inflation Reduction Act tax provisions. Please **refer to guidance** issued by the IRS for detailed information on the rules associated with Inflation Reduction Act tax provisions.

Agenda

- **The Inflation Reduction Act and Elective Pay**
- Elective Pay Final Regulations (Released 3/5/24)
- Proposed Rulemaking for Applicable Entity Partners in Partnerships (Released 3/5/24)
- Energy Credits Online and Process to Claim Credits

Introduction: The Inflation Reduction Act

- The Inflation Reduction Act (IRA) makes the **largest investment in clean energy** in United States history, and much of that investment is **delivered via tax incentives**.
- The Treasury Department is the federal agency responsible for **administering the tax code** and is **proud to be playing a central role** in implementing the Inflation Reduction Act's clean energy tax incentives.
- The Inflation Reduction Act includes **tax incentives for a broad range of activities that support building a clean energy economy**, as well as **certain cross-cutting provisions and bonuses** that apply to multiple incentives.
- This presentation discusses **Elective Pay (also known as Direct Pay)**, a novel tax credit delivery mechanism created by the Inflation Reduction Act.



Overview of Elective Pay

- With elective pay, tax-exempt and governmental entities that do not owe Federal income taxes are, for the first time, able to receive a **payment equal to the full value of tax credits for building qualifying clean energy projects or making qualifying investments.**
- Unlike competitive grant and loan programs, in which applicants may not receive an award, elective pay allows entities to get their payment if they meet **the requirements for both elective pay and the underlying tax credit.**
- The entities eligible for elective pay (applicable entities) would not normally owe federal income tax. However, by **filing a return and using elective pay**, these entities can receive **tax-free cash payments** from the IRS for clean energy tax credits earned, so long as **all requirements** are met, including a pre-filing registration requirement.
- Applicable entities can use elective pay for **12 clean energy tax credits.** As of late February, entities have requested registration numbers for more than 450 projects or facilities through IRS Energy Credits Online.

Applicable Tax Credits for Elective Pay

Energy Generation & Carbon Capture

Tax Provision	Description
Production Tax Credit for Electricity from Renewables (§ 45, pre-2025)	For production of electricity from eligible renewable sources , including wind, biomass, geothermal, solar, small irrigation, landfill and trash, hydropower, marine and hydrokinetic energy. Credit Amount (for 2022): 0.55 cents/kilowatt (kW); (1/2 rate for electricity produced from open loop biomass, landfill gas, and trash); 2.75 cents/kW if Prevailing Wage and Apprenticeship (PWA) rules are met ^{1,2,3,7}
Clean Electricity Production Tax Credit (§ 45Y, 2025 onwards)	Technology-neutral tax credit for production of clean electricity. Replaces § 45 for facilities that begin construction and are placed in service after 2024. Credit Amount: Starts in 2025, consistent with credit amounts under section 45 ^{1,2,3,6,7}
Investment Tax Credit for Energy Property (§ 48, pre-2025)	For investment in renewable energy projects including fuel cell, solar, geothermal, small wind, energy storage, biogas, microgrid controllers, and combined heat and power properties Credit Amount: 6% of qualified investment (basis); 30% if PWA requirements met ^{1,4,5,6,8}
Clean Electricity Investment Tax Credit (§ 48E, 2025 onwards)	Technology-neutral tax credit for investment in facilities that generate clean electricity and qualified energy storage technologies. Replaces § 48 for facilities that begin construction and are placed in service after 2024 Credit Amount: 6% of qualified investment (basis); 30% if PWA requirements met ^{1,4,5,6}
Low-Income Communities Bonus Credit (§ 48(e), 48E(h)) Application required	Additional investment tax credit for small-scale solar and wind (§ 48(e)) or clean electricity (§48E(h)) facilities (<5MW net output) on Indian land, federally subsidized housing, in low-income communities, and benefit low-income households. Allocated through an application process. Credit Amount: 10 or 20 percentage point increase on base investment tax credit ⁷
Credit for Carbon Oxide Sequestration (§ 45Q)	Credit for carbon dioxide sequestration coupled with permitted end uses in the United States. Credit Amount: \$12-36 per metric ton of qualified carbon oxide captured and sequestered, used as a tertiary injectant, or used, depending on the specified end use; \$60-\$180 per metric ton if PWA requirements met. ^{1,7}
Zero-Emission Nuclear Power Production Credit (§ 45U)	For electricity from nuclear power facilities. Facilities in operation prior to August 16, 2022. Credit Amount (for 2023): 0.3 cents/kWh (reduced rate for larger facilities); 1.5 cent/kWh if PW req's met ^{1,7}

* For footnotes, see irs.gov/pub/irs-pdf/p5817g.pdf. You can also learn more at IRS.gov/CleanEnergy and IRS.gov/ElectivePay.



Applicable Tax Credits for Elective Pay

	Tax Provision	Description
Manufacturing	Advanced Energy Project Credit (§ 48C) Application required	For investments in advanced energy projects. A total of \$10 billion will be allocated, not less than \$4 billion of which will be allocated to projects in certain energy communities. Credit Amount: 6% of taxpayer’s qualified investment; 30% if PWA requirements are met ¹
	Advanced Manufacturing Production Credit (§ 45X)	Production tax credit for domestic clean energy manufacturing of components including solar and wind energy, inverters, battery components, and critical materials. Credit Amount: Varies by component
Vehicles	Credit for Qualified Commercial Clean Vehicles (§ 45W)	For purchasers of commercial clean vehicles. Qualifying vehicles include passenger vehicles, buses, ambulances, and certain other vehicles for use on public streets, roads, and highways. Credit Amount: Up to \$40,000 (max \$7,500 for vehicles <14,000 lbs) ⁹
	Alternative Fuel Vehicle Refueling Property Credit (§ 30C)	For alternative fuel vehicle refueling and charging property, located in low-income and non-urban areas. Qualified fuels include electricity, ethanol, natural gas, hydrogen, and biodiesel. Credit Amount: 6% of basis for businesses and can increase to 30% if PWA is met.
Fuels	Clean Hydrogen Production Tax Credit (§ 45V)	For producing clean hydrogen at a qualified, U.S.-based clean hydrogen production facility. Credit Amount: \$0.60/kg multiplied by the applicable percentage (20% to 100%, depending on lifecycle greenhouse gas emissions), amount increases if PWA is met ^{1,7}
	Clean Fuel Production Credit (§ 45Z, 2025 onwards)	Technology neutral tax credit for domestic production of clean transportation fuels, including sustainable aviation fuels, beginning in 2025* Credit Amount: \$0.20/gallon (\$0.35/gal for aviation fuel) multiplied by CO2 “emissions factor”; \$1.00/gallon (\$1.75/gal for aviation fuel) multiplied by CO2 “emissions factor” if PWA is met ^{1,7}

* For footnotes, see irs.gov/pub/irs-pdf/p5817g.pdf. You can also learn more at IRS.gov/CleanEnergy and IRS.gov/ElectivePay.



Certain requirements and bonuses that may affect the amount of elective pay applicable tax credits

Prevailing Wage and Apprenticeship Requirements

For a number of the tax credits created or modified by IRA, the credit amount is increased by five times for projects that meet requirements for paying prevailing wages and using registered apprentices.

Domestic Content Bonus

Projects or facilities that meet domestic content requirements are eligible for a 10 percent increase to the Production Tax Credit (sections 45, 45Y) or up to a 10 percentage point increase to the Investment Tax Credit (48, 48E).

For projects or facilities beginning construction starting in 2024, for taxpayers using elective pay, the domestic content requirement can also result in a reduction of the Production Tax Credit or Investment Tax Credit if it is not met.

On Dec. 28, Treasury issued guidance on this rule for projects beginning construction in 2024 (Notice 2024-9)

Energy Communities Bonus

Projects located in historical energy communities, including areas with closed coal mines or coal-fired power plants, are eligible for a 10 percent increase in the PTC and an up to 10 percentage point increase in the ITC.

The bonus is also available to brownfield sites and to areas that have significant employment or local tax revenues from fossil fuels and higher than average unemployment.

Low Income Communities Bonus Credit Program

The program provides an increased credit of 10 percentage points or 20 percentage points to certain applicable credits that are part of the investment tax credit for certain facilities located in low-income communities, Indian lands, or federal housing projects, or serving low-income households.

You must apply and receive a capacity allocation, and then place your facility in service to claim this bonus.

Agenda

- The Inflation Reduction Act and Elective Pay
- **Elective Pay Final Regulations (Released 3/5/24)**
 - 1) Definition of “Applicable Entity”
 - 2) Pre-Filing Registration: Finalized Details
 - 3) Determining Tax Year for Entities without a Filing Obligation
 - 4) Special Rule: Grants and Loans
- Proposed Rulemaking for Applicable Entity Partners in Partnerships (Released 3/5/24)
- Energy Credits Online and Process to Claim Credits

A Note on Treasury's Process and Final Rule Applicability

Treasury's Process

- Treasury issued **proposed regulations** on Elective Pay on June 14, 2023
- We received and carefully considered **151 written comments** on the proposed regulations; comments are posted on [regulations.gov](https://www.regulations.gov)
- We conducted a **public hearing** on August 21, 2023
- We held a **Tribal consultation** on July 17, 2023
- We are grateful to all of those who took the time to provide us with **your important feedback**

*Note: Treasury expects to issue final regulations on **Transferability** in the near future.*



Some highlights of the Elective Pay final regulations

1. Definition of “applicable entity”
2. Pre-registration process
3. Rule for determining tax year for entities that do not have a Federal income tax return filing obligation
4. Special rule on tax-exempt grants and forgivable loans

(1) Definition of “Applicable Entity”

Under the final rules, applicable entities for elective pay include:

- Tax-exempt organizations
 - Under final regulations, this includes any organization described in sections 501-530 of the Code that meets the requirements to be recognized as exempt from tax under those sections
- U.S. territory governments and their political subdivisions;
- States and political subdivisions, such as local governments;
- Indian tribal governments and their subdivisions;
- Agencies and instrumentalities of state, local, tribal, and territorial governments;
- Alaska Native Corporations;
- The Tennessee Valley Authority, and
- Rural electric co-operatives.
 - The final regulations clarify that both tax-exempt and taxable rural electric co-operatives are eligible for elective pay

Note: In general, only “applicable entities” are eligible for Elective Pay.

*However, other taxpayers that are not “applicable entities” may elect to be treated as an applicable entity with respect to **three tax credits** (for carbon oxide sequestration, production of clean hydrogen, or advanced manufacturing).*



(2) Pre-Filing Registration: Finalized Details

As authorized in the statute, the final rule describes the required pre-filing registration process

- Pre-filing registration is mandatory for applicable entities or electing taxpayers that wish to make an elective payment election for applicable credits.
- This is a critical tool for the IRS to safeguard against fraud and improper payments.
- Regulations describe:
 - The manner of pre-filing registration;
 - Pre-filing registration and election for members of a consolidated group
 - Timing of pre-filing registration
 - Requirement that each applicable credit property have its own registration number
 - Other information required prior to completing the pre-filing registration process
- *Publication 5884, Inflation Reduction Act (IRA) and CHIPS Act of 2022 (CHIPS) Pre-Filing Registration Tool User Guide and Instructions* provides detailed information for applicable entities.
- Treasury and IRS will continue to monitor the pre-filing registration process to determine whether there are areas in which more efficiencies in the pre-filing registration process can be created.

(3) Determining Tax Year for Entities without a Filing Obligation

- Commenters requested **clarification on the determination of a taxable year** for entities that **do not have a filing requirement** – for instance, a state or local government that files Form 990-T solely to make an elective payment
- The **final rules** would **permit** such taxpayers, **when filing an initial Form 990-T**, to adopt a taxable year based upon a **calendar or fiscal year**, provided that such entity **maintains adequate book and records**, including a **reconciliation** of any difference between its regular books of account and its chosen taxable year, to support making an elective payment election on the basis of its chosen taxable year.
- *See next slide for Example*



(3) Determining Tax Year for Entities without a Filing Obligation

Example

Under the final regulations, a town (as described below) can choose to file a Form 990-T for 2023 using a calendar year tax year, enabling it to make an elective pay election with respect to an applicable credit property regardless of when it was placed in service during calendar year 2023. **The town has no Federal income tax return requirement under section 6011 of the Code and no Federal return requirement under 6033(a) of the Code but is filing Form 990-T for the sole purpose of using elective pay.**



July 1, 2022

The town's fiscal year (for non-tax purposes) begins on July 1, and ends June 30.



April 1, 2023

The town places applicable credit property in service on April 1, 2023



After April 1, 2023
and before filing

The town completes its pre-filing registration and chooses to adopt a calendar year (January 1 – December 31) tax year for purposes of section 6417. It maintains adequate books and records



by May 15, 2024

The town files their 2023 Form 990-T on a calendar year basis to claim credits on the applicable credit property placed in service on April 1, 2023

(4) Special Rule: Grants and Loans

- Consistent with the proposed guidance, the final rule includes a special provision that would enable entities to **combine grants and forgivable loans with tax credits**.
- If an investment-related credit property is **funded by a tax-free grant or forgivable loan**, entities would get the **same value of eligible tax credit** as if the investment were financed with **taxable funds**—provided the credit plus ‘restricted tax-exempt amounts’ do **not exceed** the cost of the investment.
- *See next page for examples*

(4) Special Rule: Grants and Loans (Examples)

Example 1: 45W

- A school district receives a tax-exempt grant in the amount of \$300,000 to purchase an electric school bus. Under IRA, clean commercial vehicles are eligible for a tax credit of up to \$40,000.
- The school district purchases the bus for \$400,000, using the grant and \$100,000 of the school district's unrestricted funds.
- The school district's basis in the electric bus is \$400,000 and the school district's section 45W credit is \$40,000.
- Since the amount of the restricted tax-exempt grant plus the amount of the section 45W credit (\$340,000) is less than the cost of the electric bus, the school district's 45W credit is not reduced.

Example 2: Section 48 ITC

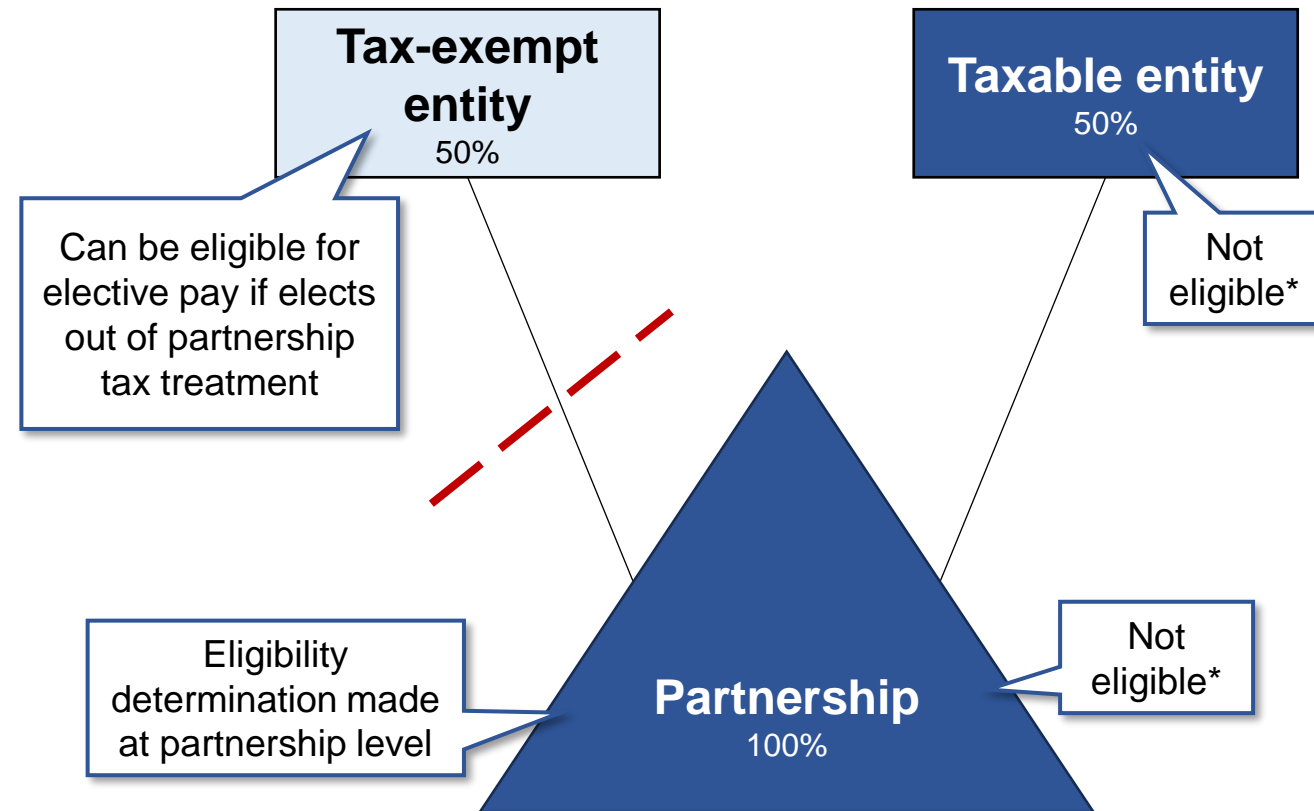
- A higher education institution receives a tax-exempt grant in the amount of \$2,000,000 to install a solar farm on its main campus.
- The institution installs the solar farm for \$10,000,000, using the grant and \$8,000,000 of the institution's unrestricted funds.
- Under IRA, the institution is eligible for a section 48 Investment Tax Credit for its investment in the solar farm. The base credit is 6%. But because the institution has met prevailing wage and apprenticeship requirements, and the solar farm is located in an energy community, the ITC credit rate is enhanced to 40%.
- The institution's basis on the solar farm is \$10,000,000 and the institution's ITC credit is \$4,000,000.
- Since the amount of the restricted tax-exempt grant plus the amount of the ITC credit (\$6,000,000) is less than the cost of the solar farm (\$10,000,000), the institution's ITC credit is not reduced due to the grant.

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Applicable Entities that Co-own Applicable Credit Property

- Under both the proposed and final elective pay rules (§ 6417), the **eligibility determination** for elective pay takes place at the **level of the entity directly owning the applicable credit property**
- Because **partnerships are not applicable entities**, when a partnership owns applicable credit property to which applicable credits are determined, **partners** in the partnership **cannot receive elective payments** on their share of the applicable credits, **even if the partner is an applicable entity such as a tax-exempt entity**
- However, both the proposed and final rules permit an applicable entity (e.g. an eligible tax-exempt entity) that co-owns applicable credit property through a **joint ownership arrangement that validly “elects out”** of partnership tax treatment to **make an elective payment election** for the eligible credits determined for its share of the eligible credit property



*Note: Taxable entities and partnerships that are eligible taxpayers may make elective pay elections for certain credits (45Q, 45V, and 45X credits).

§ 761 NPRM: Applicable Entities that Co-own Electricity-Producing Applicable Credit Property

- Following last June's release of the proposed rules, stakeholders raised that it is important for applicable entities to be able co-own and operate projects with other entities, and that **existing guidance** on arrangements that can validly elect out of partnership tax treatment was **limited and required updates to be effective for clean energy arrangements**
- Specifically, stakeholders raised that certain facts and circumstances common to **jointly owned and operated energy projects** appear to violate existing provisions of the rules for electing out of partnership tax treatment
- In response, Treasury has issued a **Notice of Proposed Rulemaking** that would **add exceptions** to the existing **election-out requirements** for co-ownership **arrangements that are organized exclusively to produce electricity from their applicable credit property** and for which one or more applicable entity co-owners will claim elective pay. The proposed guidance would:
 - Permit renewable energy investments to be made through a noncorporate entity, rather than requiring direct co-ownership of the property or facility by the applicable entity, opening up additional possible financing structures for applicable entities seeking to use elective pay
 - Modify certain joint marketing restrictions to provide that multi-year power purchase agreements would not violate the requirements to elect out of partnership tax treatment
- These proposed rules will provide broader pathways for applicable entities to access elective pay when they co-own and operate projects with other entities
- Treasury and IRS welcome written comments submitted through [regulations.gov](https://www.regulations.gov). The comment period is open for 60 days following the publication of the NPRM in the *Federal Register*.



§ 761 NPRM: Applicable Entities that Co-own Electricity-Producing Applicable Credit Property (Example)

This example illustrates the application of the specified exception for applicable unincorporated organizations:

Facts:

- X, an applicable entity, and Y own an applicable credit property through a limited liability company (LLC) that has not made an election to be treated as an association for Federal tax purposes.
- X and Y enter into a joint operating agreement with respect to the ownership and operation of the applicable credit property in which each of X and Y reserve the right separately to take in kind or dispose of their pro rata shares of the electricity produced, extracted or used.
- On January 1st of year 1, X and Y enter into delegation agreements with Z that delegate X's and Y's authority to Z to sell electricity generated by X's and Y's shares of the applicable credit property.
- The term of each delegation agreements is one year, which does not exceed the minimum needs of the industry.
- On June 1st of year 1, Z enters into a power purchase agreement with Utility on X's and Y's behalf that commits X and Y to sell the electricity produced from their shares of the applicable credit property to Utility for a term of 15 years.
- At the end of the day on December 31st of year 1, the delegation agreements terminate.

Analysis:

- Assuming the LLC otherwise meets the requirements of paragraphs (a)(1) and (a)(4)(ii) of §1.761-2, such organization can make an election to be excluded from the application of all of subchapter K under section 761(a); that is, to be excluded from partnership tax treatment under the Internal Revenue Code.
- Because X and Y did not delegate authority for a period of more than one year to sell the electricity produced from their shares of the applicable credit property, the requirements regarding a permissible delegation of authority are met.
- As such, **X can make an elective payment election for the applicable credits determined with respect to its share of the applicable credit property**, assuming the requirements of section 6417 are otherwise met.
- The analysis in this example would be the same for X whether the other co-owner, Y, is an applicable entity or not.

Note on Final Rule Applicability

- Once effective, the final rule will be applicable for taxable years ending on or after publication in the *Federal Register*
- Taxpayers with taxable years ending before that date may choose to apply the final rules, if done so entirely and in a consistent manner

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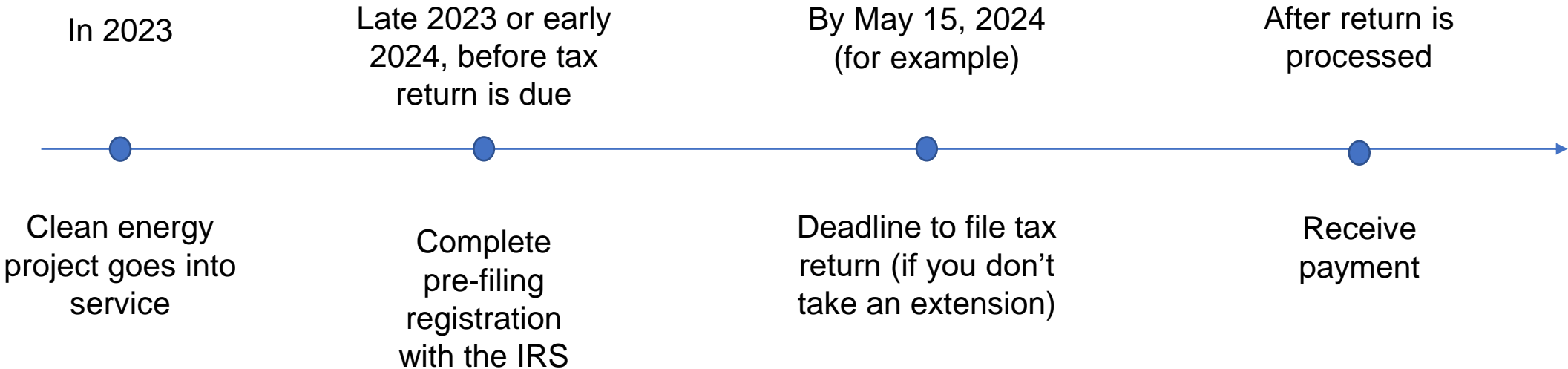
How to Claim Elective Payments

- **Identify and pursue** the qualifying project or activity.
 - You will need to know what applicable credit you intend to earn and use direct pay for.
- **Complete** your project and place it into service.
- **Determine** your tax year, if not already known, to determine when your tax return will be due.
- **Complete** pre-filing registration with the IRS after earning the underlying credit.
 - This will include the credit(s) you intend to earn, among other information.
 - Upon completing this process, the IRS will provide you with a registration number for each applicable credit property.
 - **Registration is not a determination of the amount or validity of a credit**
- **File** your tax return by the due date (or extended due date) and make a valid direct pay election.
 - Provide your registration number on your tax return as part of making the direct pay election.
 - A valid election allows you to receive payment as a refund for the amount of the credit (or if applicable, offset your tax liability and receive a payment for any remaining amount).
- **Receive** payment after the return is processed.

Example Timeline: Local Government Project Placed Into Service in 2023

A local government that makes a clean energy investment that qualifies for the investment tax credit can file an annual tax return (via Form 990-T) with the IRS to claim elective pay for the full value of the investment tax credit, as long as it meets all of the requirements, including a pre-filing registration requirement.

As the local government would not owe other federal income tax, the IRS would then make a payment in the amount of the credit to the local government.



Pre-Filing Registration: Step by Step

You must first create a Clean Energy Business Account for your organization at www.irs.gov/epregister. You will then begin the registration process below. Only an authorized representative of the entity may register and provide information and this representative's personal identity will be verified during the registration process.

The screenshot shows the IRS Clean Energy homepage. At the top, there is a blue header with the IRS logo and navigation links for 'DEALERSHIP', 'Profile', 'Help', and 'Logout'. Below the header, the page is titled 'Welcome to IRS Clean Energy' and includes a sub-header: 'The Inflation Reduction Act (IRA) and the Chips and Science Act (CHIPS Act) offer credits for clean energy and manufacturing investments.' The main content area is divided into three columns. The first column is for 'Clean Energy and Semiconductor Manufacturers' with a 'GET STARTED' button circled in blue. The second column is for 'Vehicle Manufacturers' with a 'GET STARTED' button. The third column is for 'Vehicle Dealers and Sellers' with a 'GET STARTED' button.

The screenshot shows the 'IRA/CHIPS Credits' registration page. At the top, there is a blue header with the IRS logo and navigation links for 'BUSINESS NAME', 'Profile', 'Help', and 'Logout'. Below the header, the page is titled 'IRA/CHIPS Credits'. The main content area includes a 'REGISTER' button circled in blue, a 'Your Registrations' section with a list of actions, and an 'Email Notifications' section.

- View registrations
- See each registration number by facility/property
- Get account status updates

[View your registrations and status updates](#)

A comprehensive user guide and video tutorial can also be found at www.irs.gov/epregister.



Pre-Filing Registration: Step by Step

Registrant Type *

Unsure of your registrant type? See the definitions at the bottom of the page

- Organization exempt from the tax imposed by subtitle A by reason of Section 501(a) of the Code
- Government of any U.S. territory or a political subdivision thereof (including an agency or instrumentality)
- State, the District of Columbia, or political subdivision thereof (including an agency or instrumentality)
- Indian tribal government or a subdivision thereof (including an agency or instrumentality)
- Alaska Native Corporation (excluding an Alaska Native Settlement Trust)
- Tennessee Valley Authority
- Rural electric cooperative
- Partnership
- S corporation
- C corporation
- Real Estate Investment Trust
- Sole Proprietorship
- Trust
- Other

- The [user guide](#) contains descriptions for each option if you are unsure of your registrant type
- Prior to providing credit specific information, you will also be asked for:
 - Address information – provide the address used on the registrant's last annual return or last employment tax return.
 - Banking information
 - Information about returns filed

Pre-Filing Registration: Step by Step

- Select the credits your organization intends to claim using direct pay.
- Specific information will be required for each credit.

IRA Credits	
<input type="checkbox"/> (30C) Alternative Fuel Refueling Property Credit Investment tax credit for alternative fuel refueling property placed in service in a population census tract that is a low-income community for purposes of the new markets tax credit, or in a population census tract that is not an urban area.	<input type="checkbox"/> (45) Renewable Electricity Production Credit Production tax credit for production of electricity from qualified energy resources at a qualified facility during the 10-year credit period which is sold to an unrelated party.
<input type="checkbox"/> (45Q) Carbon Oxide Sequestration Credit Production tax credit for capture and sequestration of carbon oxide at a qualified facility.	<input type="checkbox"/> (45U) Zero Emission Nuclear Power Production Credit Production tax credit for electricity produced by the taxpayer at a qualified nuclear power facility (which excludes an advanced nuclear facility defined in section 45J).
<input type="checkbox"/> (45V) Clean Hydrogen Production Credit Production tax credit for the domestic manufacturing and sale of certain solar and wind energy components, certain inverters, qualifying battery components, and applicable critical minerals.	<input type="checkbox"/> (45W) Qualified Commercial Clean Vehicles Credit Investment tax credit for purchase of one or more qualified commercial clean vehicles.
<input type="checkbox"/> (45X) Advanced Manufacturing Production Credit Creates a new credit to include production of other clean energy products and materials. (E.g., wind, solar, battery storage, inverters, applicable critical minerals components)	<input type="checkbox"/> (45Y) Clean Electricity Production Credit Production tax credit for production of electricity at facilities with a greenhouse gas emissions rate not greater than zero.
<input type="checkbox"/> (45Z) Clean Fuel Production Credit Production tax credit limited to registered producers of certain clean transportation fuels produced in the United States.	<input type="checkbox"/> (48) Energy Credit Extends and expands the 48 Energy credit based upon the investment in qualified energy property.
<input type="checkbox"/> (48C) Advanced Energy Project Credit Investment tax credit for qualifying investments in qualifying advanced energy projects that receive an allocation based on a competitive application process.	<input type="checkbox"/> (48E) Clean Electricity Investment Credit Investment tax credit for qualified investment in qualifying zero-emissions electricity generation facilities or energy storage technology.

Pre-Filing Registration: Step by Step

- The registrant will need a separate pre-filing registration number for each facility/property.
- In addition to providing credit specific information, such as the location of the facility, you will need to provide supporting documentation.
- The user guide offers additional details, including how to use the bulk upload option.

Add Supporting Documents to Facility/Property 1

(*) Indicates a required field

To apply for a registration number, provide one or more of the documents types listed below. Failure to do so may result in a delay.

Document Types

- Permits
- Life cycle assessment Department of Energy and IRS approval letter (utilization of captured CO2 only)
- Engineer certification (enhanced oil recovery)
- Evidence of ownership

Instructions

Upload your supporting documentation below. Once you upload your document, you'll need to select a document type below. Make sure to press **SAVE** before leaving the page. Otherwise, any updates will be lost.

- Maximum number of files: 10
- File types allowed: .pdf, .jpg, .jpeg, .png, .ppt, .pptx, .doc, .docx, .xls, and .xlsx
- Maximum file size : 15MB/file
- PDF files must be 120 pages or less
- File name cannot contain: `!@\$%^&*[]{};:~",<>/?-

Drag and drop files here, or

SELECT FILES TO UPLOAD

Pre-Filing Registration: Step by Step


The screenshot shows the '2023 IRA/CHIPS Credit Registration' page in the 'Review & Submit' step. A progress bar at the top indicates five steps: General Info, Credit Selection, Facility/Property Info, Review & Submit (current step), and Confirmation. Below the progress bar, the 'Review & Submit' section contains a 'General Information' card with an 'Edit' link. At the bottom, there is an 'Attestation' section with a checkbox and the text: 'Under penalties of perjury, I declare that the information contained in this authorization is true, correct and complete to the best of my knowledge and belief.' Below the attestation are three buttons: 'BACK', 'SUBMIT', and 'SAVE PROGRESS'. A 'Cancel' link is also visible at the bottom left.

- You can save your work in progress.
- Until you submit the registrant's registrations for review, the "CONTINUE REGISTRATION" option will appear, and the Submission Status will show as "Draft."
- Review and, when accurate and complete, submit your requests for registration numbers.

The screenshot shows the 'Your Registrations' page. It displays a table with one registration entry: '2023 IRA/CHIPS Credit Registration' with a 'Submission Status' of 'Draft' and 'Facilities/Properties' of '21,103'. A 'CONTINUE REGISTRATION' button is highlighted with a red circle. Below the table is a 'Registration Information' section showing '21,234 Facilities/Properties' and a table with columns: Registration #, Credit, Facility/Property #, Identifier, Election Type, Facility/Property Status, and Comments.

Pre-Filing Registration: Step by Step

- After you submit a registration package, you can monitor its status in the "Your Registrations" site.
- A registration submitted for review cannot be changed until it is:
 - Returned with registration numbers or;
 - Returned with comments that explain why registration numbers were not issued.
- Your submission status will appear as one of the following:
 - Awaiting Assignment
 - Under Review
 - Returned
 - Returned – Closed
 - Returned – Open

 **Success**

We received your 2023 IRA/CHIPS Credit Registration.

[Return to IRA/CHIPS Home](#)

Confirmation

What's next?

Check Your Registration Status
[View your registrations](#) at least monthly to check current status, make changes, provide requested information and get your registration numbers. Registration details can only be found under **Your Registrations**.

Respond to Requests for Information Within 60 Days
We process registrations in the order received. If necessary, we will initiate a request for more information. You'll have 60 days to respond to the request before we stop action on your registration. If you resubmit your registration after the 60-day period, your registration will go to the back of the line.

Get Your Registration Numbers
If approved, you'll receive your registration numbers to use when you file your return.

Sign up for Notices About Registration Status Changes
[Manage email notifications](#) about your registration status.

- If you opt in, we'll send you an email notice to sign in to your Clean Energy Business Account when the status of your registration changes, or if you need to provide more information
- If you chose not to receive email notices, return at least monthly to check for status updates and requests for information. We will not send any other form of communication

You can revise a submitted registration only once it is returned by the IRS



Closing

- More Information on Direct Pay
 - ✓ [IRS.gov/ElectivePay](https://www.irs.gov/ElectivePay)
 - ✓ [Pre-filing Registration User Guide](#); [How-to-Video](#)
 - ✓ [Permission Management User Guide](#)
 - ✓ [FAQs](#)
 - ✓ [CleanEnergy.gov/DirectPay](https://www.CleanEnergy.gov/DirectPay)
 - ✓ [Treasury.gov/IRA](https://www.Treasury.gov/IRA)
 - ✓ Subscribe to IRS e-News Subscriptions by visiting [IRS.gov/newsroom/e-news-subscriptions](https://www.irs.gov/newsroom/e-news-subscriptions) → Tax exempt & government entities
- More information on the IRA
 - ✓ [IRS.gov/CleanEnergy](https://www.irs.gov/CleanEnergy)
 - ✓ www.whitehouse.gov/cleanenergy/inflation-reduction-act-guidebook/