

Changes in the construction entities of energy storage projects





Overview

When will tax credits for wind and solar projects phase out?

Under the new law, tax credits for wind and solar projects phase out much sooner. To qualify, these projects must either be completed by the end of 2027 or begin construction within the next 12 months. This compressed timeline will likely force developers to accelerate their project schedules or risk losing critical tax credits.

Do new power plant and battery projects qualify for tax credits?

The final House bill would require new power plant and battery projects to check two boxes to claim "technology-neutral" tax credits under sections 45Y and 48E of the US tax code: the projects must be under construction for tax purposes within 60 days after President Trump signs the bill and they must then be placed in service by the end of 2028.

Which projects are tax deductible under the obbb?

Non-solar and wind technologies (e.g., storage, hydropower, and geothermal) fare much better under the OBBB. Tax credits for these projects are subject to a phase-down schedule that begins for projects that commence construction after 2033.

Can you get a section 45v credit from a wind or solar facility?

(The legislation clarifies that energy storage at a wind or solar facility is eligible for the ITC for that longer period.) Hydrogen facilities must begin construction before the end of 2027 to claim the section 45V credit. The new law does not change the definition of "beginning of construction."

Do construction projects qualify for tax credits?

Tax credits for these projects are subject to a phase-down schedule that begins for projects that commence construction after 2033. Projects beginning construction in 2034 and 2035 will still qualify for tax credits but with a 75%



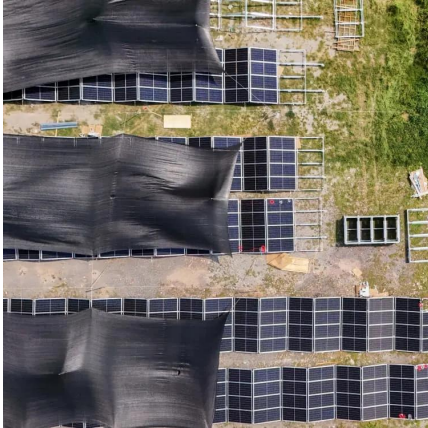
and 50% haircut, respectively.

How does the obbb affect renewables and energy transition?

The OBBB's enactment dramatically shifts the landscape for renewables and energy transition investments.



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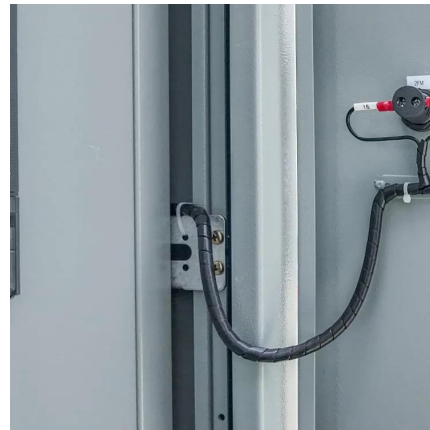


Clean Energy Tax Changes Cut Timelines, Add Red Tape , Balch ...

Stand-alone storage projects, or storage projects installed with a wind or solar facility, that begin construction by the end of 2033 will retain full eligibility for the Section 48E ...

[X definition and meaning , Collins English Dictionary](#)

X can be used to represent the name of a person when you do not know their real name, or when you are trying to keep their real name a secret.



FACT SHEET: Four Ways the Inflation Reduction Act s Tax ...

The Inflation Reduction Act modifies and extends the clean energy Investment Tax Credit to provide a 30 percent credit for qualifying investments in wind, solar, energy storage, and other ...



'One Big Beautiful Bill' Act brings changes, clarity to energy ...

Energy storage escaped much of the pain inflicted on solar, but foreign entity restrictions may create some supply-chain challenges.



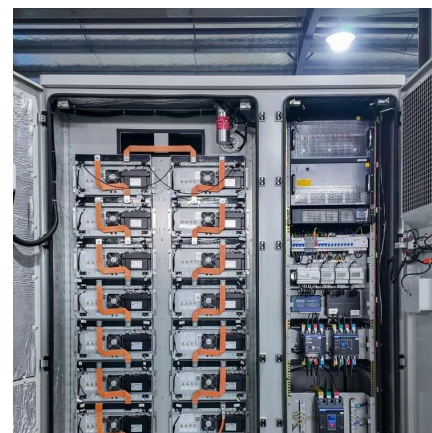
2025 Reconciliation Debate: Energy Provisions

Review key energy provisions in the House's budget reconciliation bill, including proposals from multiple committees and potential impacts on energy policy, infrastructure, and ...



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One Big Beautiful Bill Act Cuts the Power:... , Frost Brown Todd

On July 4, 2025, President Trump signed H.R. 1--dubbed the One Big Beautiful Bill Act (OBBBA)--enacting significant modifications to clean-energy credits



United States: New winds blowing as the sun sets on IRA tax ...

In brief The One Big Beautiful Bill Act (OBBBA) ("Act ") made substantial changes to credits created or enhanced under the Inflation Reduction Act (IRA). Modifications to these ...



[A 2025 Update on Utility-Scale Energy Storage ...](#)

While the energy storage market continues to rapidly expand, fueled by record-low battery costs and robust policy support, challenges still ...



[Energy Storage Systems \(ESS\) Projects and Tenders](#)

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One Big Beautiful Bill New Law Disrupts Clean Energy Investment

To qualify, these projects must either be completed by the end of 2027 or begin construction within the next 12 months. This compressed timeline will likely force developers to ...



'One Big Beautiful Bill' Act brings changes, some clarity to US ...

While the changes bring new issues to developers in the US, many market leaders agree that having more clarity on future projects is a welcome change from recent months.

[What you need to know about the IRA and tax equity](#)

Many direct pay transactions involving tax-exempt entities building solar and BESS projects that they will own are in the works, and more are expected as more such entities dip ...



'One Big Beautiful Bill' Act brings changes, some clarity to US energy

While the changes bring new issues to developers in the US, many market leaders agree that having more clarity on future projects is a welcome change from recent months.



A 2025 Update on Utility-Scale Energy Storage Procurements

While the energy storage market continues to rapidly expand, fueled by record-low battery costs and robust policy support, challenges still loom on the horizon--tariffs, shifting ...



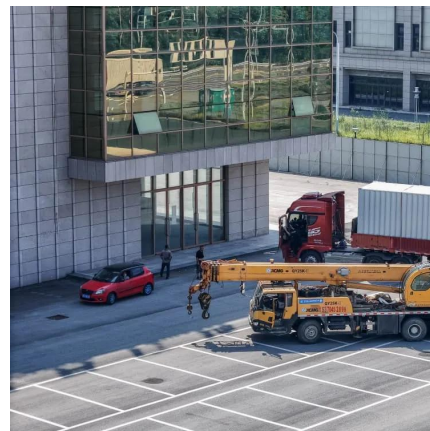
Final regulations on clean electricity production and ...

Introduction The U.S. Treasury Department and IRS on January 7, 2025, issued final regulations (T.D. 10024) related to the section 45Y clean electricity production credit and section 48E ...

House Reconciliation Bill Amends Clean

...

The effective date of the FEOC restrictions would vary depending on the specific FEOC restriction, as follows: (i) ...



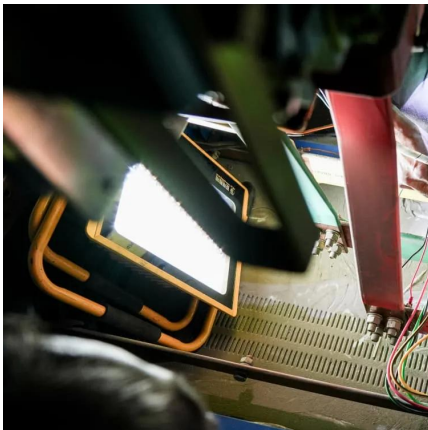
X

X, or x, is the twenty-fourth letter of the Latin alphabet, used in the modern English alphabet, the alphabets of other western European languages and others worldwide.



Effects of the Final House Tax Bill on Projects

PTCs and ITCs on wind, solar and other renewable electricity and battery storage projects that are already in operation will not be affected by the House bill. Neither will tax ...



One Big Beautiful Bill New Law Disrupts Clean Energy ...

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Battery Energy Storage Systems Report

This information was prepared as an account of work sponsored by an agency of the U.S. Government. Neither the U.S. Government nor any agency thereof, nor any of their ...



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Navigating OBBBA: phaseouts, prohibited foreign entity rules, ...

In addition to the changes to the credit eligibility dates and the new foreign entity rules, the law makes a number of other policy changes. Below is a non-exhaustive list.



'One Big Beautiful Bill' Act brings changes, clarity to energy storage

Energy storage escaped much of the pain inflicted on solar, but foreign entity restrictions may create some supply-chain challenges.



[OBBBA: Navigating clean energy tax credits in a new era](#)

Under this backdrop, in this article we explore the new provisions and significant amendments made by the OBBBA and highlight key takeaways for developers, energy ...



Incentives and credits tax provisions in "One Big Beautiful Bill" ...

The Senate bill treats an entity as a foreign-influenced entity if the payments to the specified foreign entities are pursuant to an agreement that entitles the specified foreign entity ...



DOE Reduces Regulatory Hurdles For Energy Storage, ...

DOE is simplifying the environmental review process for certain energy storage systems such as battery systems, transmission line upgrades, and solar photovoltaic systems.



Tax-Exempt Entities and the Investment Tax Credit (§ 48 and ...

Tax-Exempt Entities and the Investment Tax Credit (§ 48 and § 48E) Tax-exempt and governmental entities, such as state and local governments, Tribes, religious organizations, ...

US restarts solar, storage permitting but agency gaps ...

The U.S. has resumed permitting of solar and storage on federal land but developers face a lack of agency staff and uncertainty over tax credits.



House Passes Major Cuts to IRA Clean Energy Tax ...

A listed Chinese battery and energy storage manufacturer (specifically, the entities listed in paragraphs (1) through (7) on page 47 of L. ...



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