



OBBB UPDATES

Technology Tax Credits

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@gdsassociates.com

TAX CREDIT SCHEDULE

Solar Tax Credits	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035
Production Tax Credit (45Y) & Investment Tax Credit (48E)										
FEOC Content Limits	45%	40%	35%	30%	25%	25%	25%	25%	25%	25%
10% Domestic Content Bonus Minimums	50%	55%	55%	55%	55%	55%	55%	55%	55%	55%

BOC	COD	ITC/PTC	FEOC Limit	10% DC Bonus	Requirements/Details:
12/31/2025	12/31/2029*	30%	100%	>=45%	<ul style="list-style-type: none"> Pre OBBB safe-harbor rules & FEOC material limits 4-Year continuity safe-harbor for ITC
1/1/2026 - 7/4/2026	12/31/2030*	30%	45%	>=50%	<ul style="list-style-type: none"> 4-Year continuity safe-harbor for ITC
7/5/2026 +	12/31/2027	30%	40%-45%	>=50-55%	<ul style="list-style-type: none"> Must complete construction in 18 Month (or less) for ITC timeline to receive credits
7/5/2026+	1/1/2028+	0%	25-45%	>=55%	<ul style="list-style-type: none"> ITC tax credits no longer achievable

* Tax code indicates end of year deadline, instead of true 4-year cut-off point of 7/3/2029, and 7/3/2030, finish by June to ensure deadlines are met

SOLAR PROJECT ITC/PTC

Key Dates for Eligibility

- | **Final Day to Begin Construction (BOC):** July 4, 2026.
 - Must complete construction by December 31, 2030 at the latest to receive ITC/PTC credits (continuity rule)
- | **Placed in Service Deadline:** December 31, 2027, for projects that do not meet the "begin construction" deadline.
- | **Safe Harbor:** The IRS Notice 2025-42 (August 2025) removed the 5% safe harbor for projects >1.5 MWac, requiring the "Physical Work Test" to be met by July 4, 2026.
 - Potential to install multiple <1.5 MW installations, could allow for separate ITC certification filings
- | **Continuity Rule:** If construction begins by July 4, 2026, projects must be placed in service within 4 years to qualify for the 4-year continuity safe harbor.
 - Tax code allows COD by end of the 4th year

NEW TAX CODE HAS SOURCING REQUIREMENTS

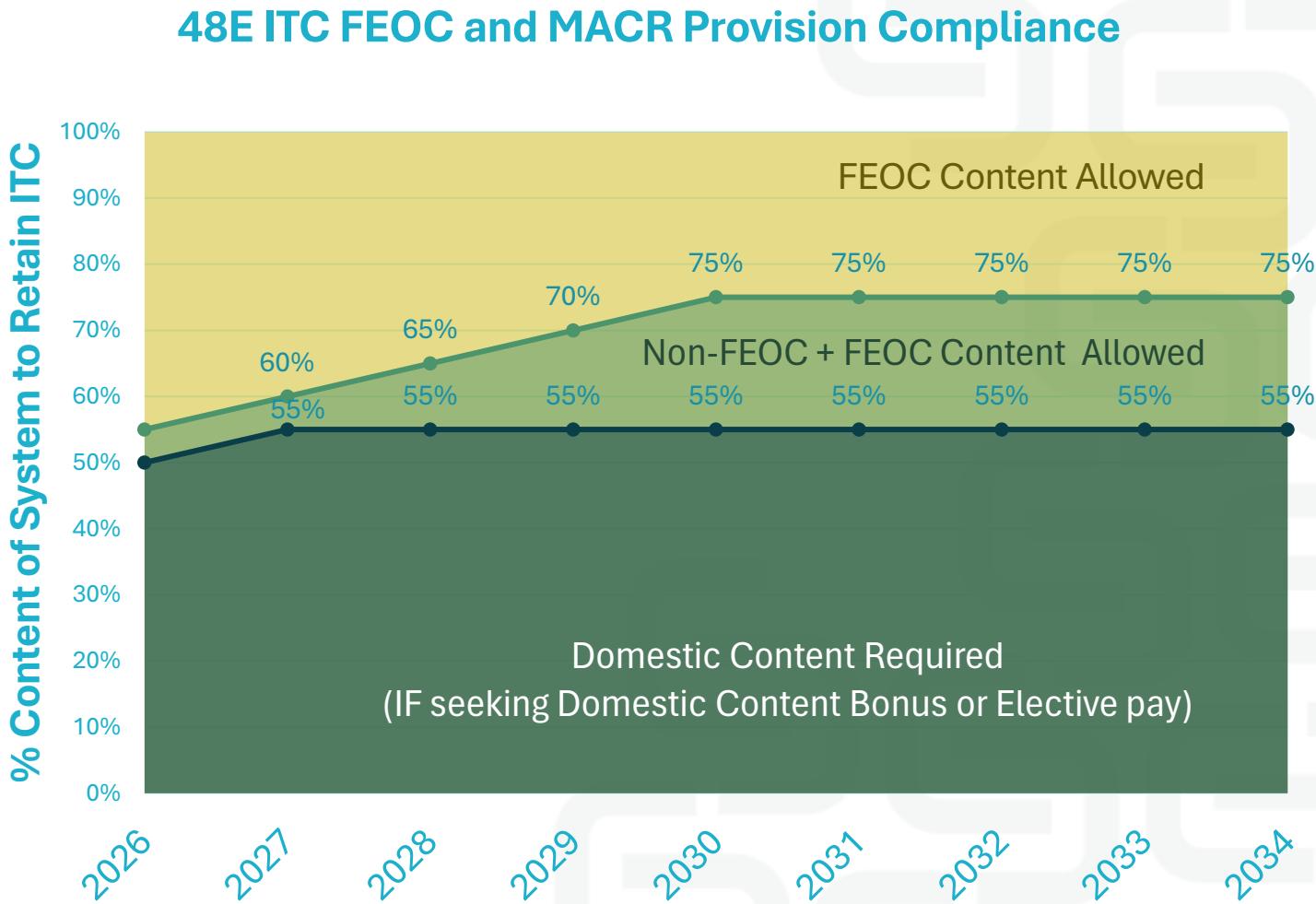
Foreign Entities of Concern (FEOC):

| Beginning January 1, 2026, to receive ITC/PTC, projects must limit MACR from countries that have FEOC status

- FEOC Countries: China, Russia, North Korea, Iran
- 45% FEOC allowance, ramping down to 25% for projects with 2030+ BOC

| 10% Domestic Content Bonus if 50%+ sourced in the US

- 50% for 2026 COD, 55% for 2027+



(48E) Investment Tax Credit tax code
(ITC) Investment Tax Credit

(MACR) Material Assistance Cost Ratio
(FEOC) Foreign Entity of Concern

TAX INCENTIVE SUMMARY

ITC/PTC & FEOC

| **Perkasie can achieve tax incentives totaling 30-40% of the project cost by:**

| **1. Beginning construction by 7/4/2026 (30% ITC/PTC)**

- 4-year continuity rule requires COD by 12/31/2030
- 45% Maximum FEOC content
- 50% Domestic content to achieve 10% Bonus (40% Total, including ITC/PTC)

| **2. Completing construction by 12/31/2027 (30% ITC/PTC)**

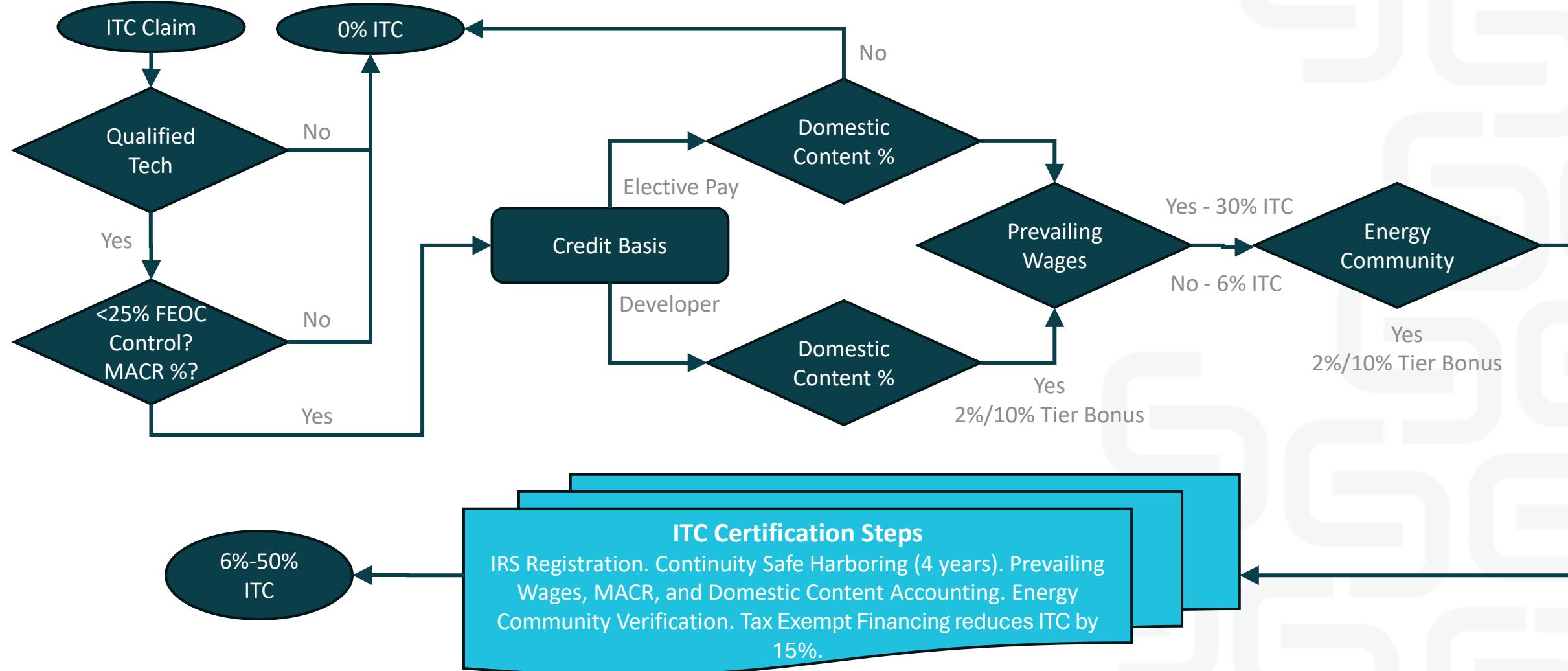
- If BOC is after 7/4/2026
- 40-45% Maximum FEOC content
- 50-55% Domestic content to achieve 10% Bonus (40% Total, including ITC/PTC)

| **Projects that do not BOC by 7/4/26 or COD after 12/31/2027 are only eligible for 10% domestic content bonus**



APPENDIX

KEY ITC PROVISIONS SUMMARY



TAX CREDIT SCHEDULE

	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035
45Q (PTC) Sequestration										
45V (PTC) H2 Production			X	X	X	X	X			
45X (PTC) Manufacturing Production					75%	50%	25%			
45Z (PTC) Clean Fuel Production										
45Y (PTC) Qualified Technology Production								75%	50%	
45Y (PTC) (wind and Solar)			X	X	X	X	X	X	X	X
48E (ITC) Qualified Technology Investment								75%	50%	
48E (ITC) (wind and Solar)			X	X	X	X	X	X	X	X

X – Original Schedule

Qualified Technology – Energy Storage, Nuclear, Hydro, Geothermal

EV Tax credit schedule eliminated