



OBBB UPDATES

Technology Tax Credits

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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 OBBS 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):

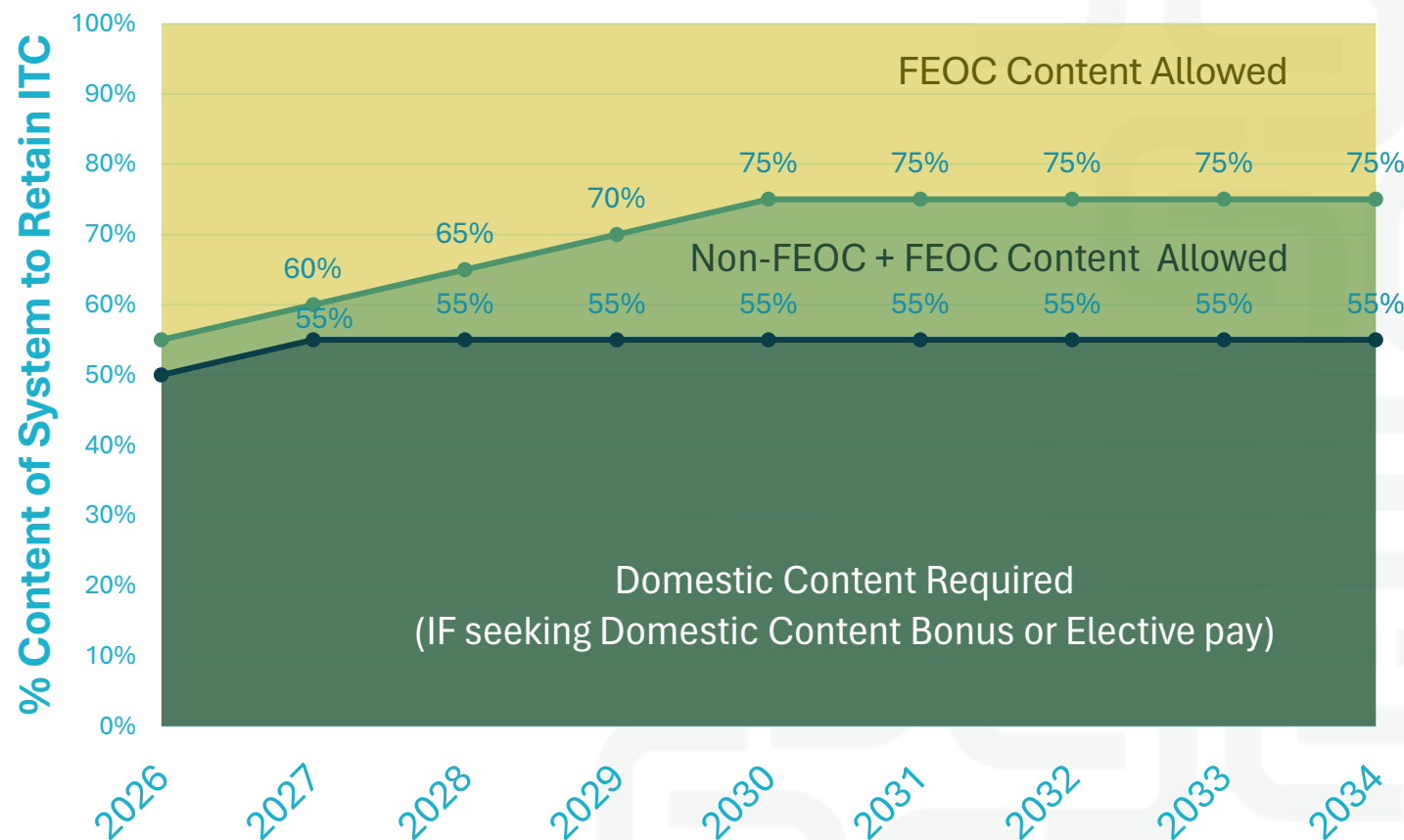
Beginning January 1, 2026, to receive ITC/PTC, projects must limit MACR from countries that have FEOC status

- 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 ITC FEOC and MACR Provision Compliance



(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)**

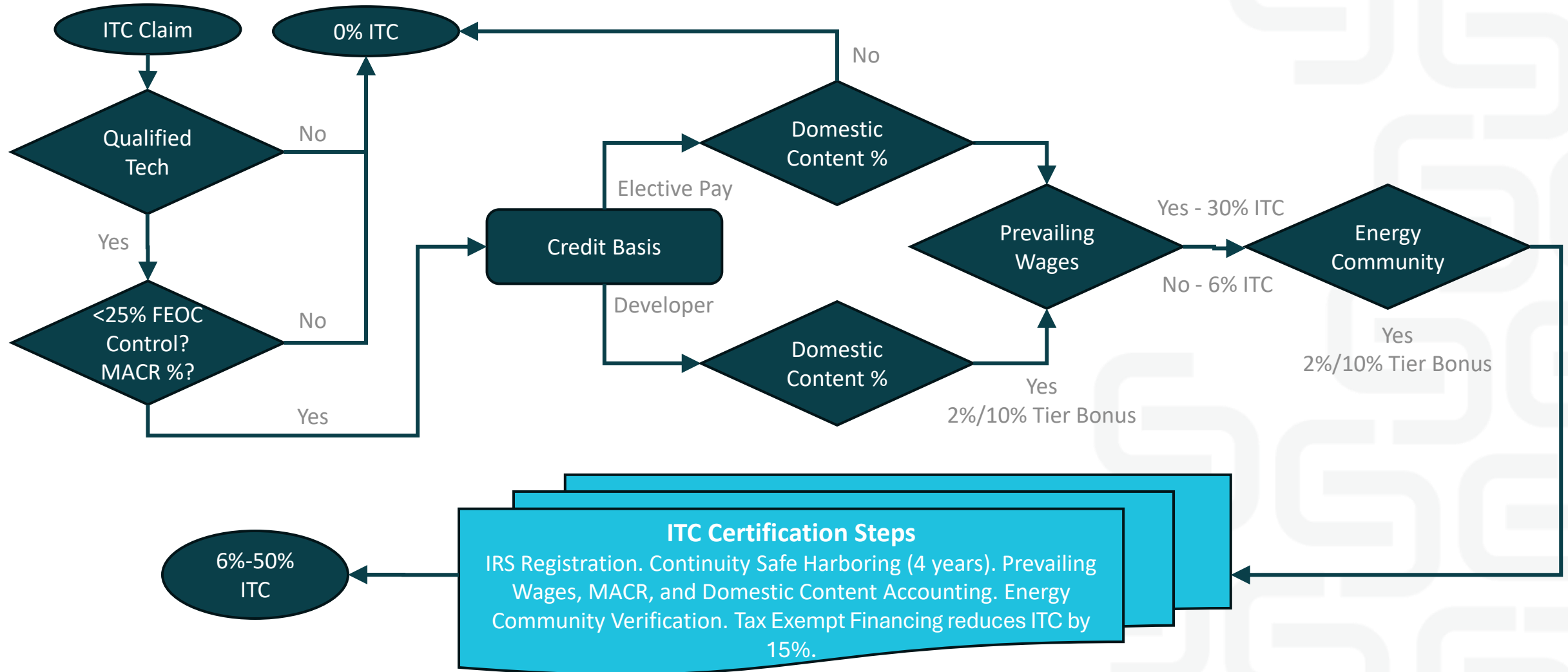
- If BOC is after 7/4/2026
- 40-45% Maximum FEOC content
- 50-55% Domestic content to achieve 10% Bonus (40% Total, including ITC/PTC)

| **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