

## Utility Tax

To achieve their business and financial objectives and provide quality customer service, energy, power and other utilities need legal counsel that understands the complex regulatory and market pressures they face. Troutman Sanders' Utility Tax practice provides effective solutions to the full range of tax issues and provides comprehensive representation in disputes with tax authorities.

We advise clients on a full range of matters, including the following:

- Tax planning and counseling
- Tax structuring and tax consequences of proposed transactions
- Private letter rulings, technical advice memoranda and permissions to change accounting methods
- Tax return reviews
- Tax controversies and dispute resolution
- Internal Revenue Service (IRS) audits and appeals

To help clients stay abreast of emerging legislative and regulatory concerns, we conduct a series of seminars each spring on the tax issues related to the tax returns of electric utilities.

Our Utility Tax practice comprises attorneys with significant experience representing industry clients whose activities evoke a range of federal, state, or local tax considerations. Among our team are attorneys with prior experience in the Office of Chief Counsel for the IRS, and most of the group's partners have advanced degrees in tax law.

We conduct sophisticated tax analyses and risk assessments, and regularly render tax advice on proposed return positions and transactions. Our attorneys also handle tax controversies in all administrative and judicial forums, from initial investigation through trial, and have extensive experience dealing with tax authorities at the federal, state and local levels.

Among our clients are electric and gas utilities, natural gas pipelines, independent power producers, electric transmission companies, developers and owners of renewable energy and financial institutions providing debt and equity capital, and related services to these industries.

### **Legislative Services**

Our Utility Tax attorneys advise utilities and trade associations such as EEI on legislative tax issues relevant to the electric industry. Our team is experienced in drafting legislation, developing and reviewing legislative proposals, and negotiating legislative issues with the tax-writing staffs of the U.S. House of Representatives and the U.S. Senate.

### **Tax Newsletter**

The Utility Tax practice has developed and publishes a subscription-based *Washington Developments Tax Service*, through which it provides advice to clients from all segments of the electric utility industry on emerging legislative, administrative and judicial tax developments of particular relevance to their companies. Please click to learn more about and to subscribe to this publication.