

Press Coverage | June 30, 2023

# IRS Energy Direct Pay Rules Take Some Projects ‘Off the Table’

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Anne Loomis, a partner in Troutman Pepper's Tax Practice Group, was quoted in the June 30, 2023 *Bloomberg Law* article, "[IRS Energy Direct Pay Rules Take Some Projects ‘Off the Table’](#)."

"If they have to own it directly, they need to be taking on all of the operational risk," said Anne Loomis, a partner at Troutman Pepper. "I think for some tax-exempt entities, that's not a risk that they're able to take on."

...

Treasury offers an alternative for exempt and taxable organizations: joint ownership. This is a much less efficient way of owning and operating a project than a partnership would be, Loomis said.

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