

## Anne C. Loomis

Partner

Richmond

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Anne is a tax attorney and CPA with many years of experience in the energy industry. Her in-house experience with a Fortune 500 energy company, understanding of clients' tax accounting considerations, and face-to-face experience with the IRS make her an invaluable member of the tax practice.

### OVERVIEW

Anne is a partner in the firm's Tax Practice Group. She focuses her practice on federal, state, and local tax planning with an emphasis on the unique tax issues facing rate-regulated public utilities and other energy industry clients. Having previously served as tax counsel for a *Fortune* 500 corporation specializing in electric generation and distribution and gas transmission, Anne has extensive experience working on acquisitions, dispositions, and reorganizations. Anne regularly advises clients on structuring investments that produce federal and state tax benefits, with an emphasis on energy tax credits.

Anne has represented clients in IRS audits, IRS appeals conferences, controversies with state taxing authorities, and the U.S. Tax Court, and in the preparation of requests for private letter rulings from the IRS.

### REPRESENTATIVE MATTERS

- Served as tax counsel for the acquisition of more than 2 GW of utility-scale solar and wind-powered electrical generating facilities involving the use of federal and state tax credits and other tax incentives.
- Represented the seller in connection with the sale of a 25% equity interest in an entity owning a liquefied natural gas import, export, and storage facility for approximately \$2.1 billion in cash.
- Represented a sponsor in connection with a partnership flip transaction for a 200 MW solar generating facility in Illinois.
- Represented an investor in connection with the sale-leasebacks of a portfolio of solar projects in excess of 30 MW in several states.
- Represented a sponsor in connection with an inverted lease transaction for three solar projects in North Carolina with an aggregate nameplate capacity of 95 MW.
- Represented the seller in connection with the sale of two combined-cycle electrical generation facilities for \$1.2 billion.
- Represented the seller in connection with the sale of a 33% equity interest in a portfolio of 425 MW of solar electrical generating facilities.

- Representing an investor in connection with an early-stage carbon capture and sequestration facility under development in California.
- Represented an investor in connection with the formation of a joint venture for investing in renewable natural gas facilities nationwide.
- Represented a taxpayer in connection with requests for nuclear decommissioning trust fund rulings from the Internal Revenue Service.
- Successfully represented the taxpayer in *Abdel-Fattah v. Commissioner*, 134 T.C. 190 (2010), *acq.* I.R.B. No. 2010-47 (Nov. 22, 2010), resulting in acquiescence by the IRS on an issue of certification of embassy employees under Internal Revenue Code section 893(a).

## AWARDS

- *Best Lawyers in America®*: Tax Law (2024, 2026), Energy Law (2026)
- *Legal 500 United States* for Finance: Project Finance (2023-2025); Energy: Renewable/Alternative Power (2024) Energy: Energy Transactions: Electric Power (2024-2025);
- *Virginia Lawyers Weekly*: “Leader in the Law” (2022)

## TOP AREAS OF FOCUS

- Energy
- Energy Tax
- Renewable Energy
- Tax
- Transactions + Planning

## ALL AREAS OF FOCUS

- Energy
- Energy Tax
- Inflation Reduction Act of 2022 – Energy Industry Implications
- Renewable Energy
- Tax
- Transactions + Planning

## PROFESSIONAL/COMMUNITY INVOLVEMENT

- Fellow, American Bar Foundation (membership is limited to 1% of attorneys licensed to practice in each jurisdiction)
- Certified Public Accountant, Virginia Board of Accountancy
- Board of Directors, Tax Executives Institute, Virginia Chapter, 2017-2020
- Volunteer, Community Tax Law Project, Richmond, VA

## PROFESSIONAL EXPERIENCE

- In-house tax counsel, Dominion Energy Services, Inc., 2013-2020

## EDUCATION AND CERTIFICATIONS

### EDUCATION

- George Mason University, J.D., *summa cum laude*, 2007
- Northwestern University School of Professional Studies, Graduate Certificate in accounting
- University of Virginia, B.A., *Phi Beta Kappa*, 2002

### BAR ADMISSIONS

- Virginia
- District of Columbia (Inactive)

### COURT ADMISSIONS

- U.S. Tax Court

### CLERKSHIPS

- Hon. Donald W. Lemons, Supreme Court of Virginia, 2007-2008

## SPEAKING ENGAGEMENTS

- Speaker, "[Executive Orders and Tariffs: Impacts to the Utility Industry](#)," EEI Tax Section Meeting, June 4, 2025.
- Speaker, "[Final Regs for Renewable Energy Investment Tax Credit: Eligibility, Compliance, Strategic Insights](#)," Strafford Publications Webinar, February 20, 2025.
- Speaker, "[Navigating Clean Hydrogen Tax Credits: Insights and Implications](#)," *Energy Law Insights*, October 2, 2024.
- Speaker, "[Transferable Energy Credits: Lessons Learned and Continuing Challenges](#)," TEI 79th Annual Conference, October 27-30, 2024.
- Speaker, "[New IRS Guidance on Advanced Manufacturing Production Tax Credit Under the Inflation Reduction Act](#)," Strafford Publications Webinar, March 29, 2024.
- Moderator, "[Investing in & Financing Hydrogen Projects and their Impact on the Power Markets](#)," 2024 Infocast Projects & Money Conference, January 19, 2024.
- Moderator, "[The Role of Battery Storage to Solve the Grid Issues](#)," Financing Wind Onshore & Transmission, September 21, 2023.
- Speaker, "[Troutman Pepper's Guide to Tax Credit Transferability](#)," Troutman Pepper webinar, July 18, 2023.
- Speaker, "[Tax Equity Perspectives on the Post-IRA Storage Market](#)," Infocast Energy Storage Finance & Investment Summit, June 21, 2023.
- Speaker, "[Tax Issues for Co-location of Energy Storage with Solar or Wind](#)," *Energy Law Insights*, May 19, 2023.
- Speaker, "[Optimizing Investments in Energy Storage](#)," *Energy Law Insights*, May 8, 2023.
- Moderator, "[Inflation and IRA 2022 Impacts on Project Finance](#)," US Development & Finance Forum, March 21, 2023.
- Speaker, "[Policies and Regulations: Analyzing the Inflation Reduction Act](#)," HYDRO+ Series™?, November 10, 2022.
- Speaker, "Clean Energy Tax Credits," Edison Electric Institute/American Gas Association Taxation Committee Meeting, November 9, 2022.

- Speaker, “Coal and Carbon Capture Provisions in the Inflation Reduction Act,” U.S. Department of Energy-NARUC Coal Modernization and Carbon Management Partnership Webinar, September 1, 2022.
- Speaker, “Current Tax Legislative Landscape for Renewable Energy,” Association of Corporate Counsel, Energy Network, June 15, 2022.
- Speaker, “Life Cycle of a Deal: From Napkin to Financial Statements,” TEI Virginia, May 18, 2022.
- Speaker, “Ethics, E&P, and 165g,” TEI Iowa and Troutman Pepper, November 16, 2021.

## PUBLICATIONS

- Co-author, “IRS Issues Beginning of Construction Guidance in Response to July Executive Order,” *Troutman Pepper Locke*, August 18, 2025.
- Co-author, “Navigating the One Big Beautiful Bill Act: A Practical Guide,” *Troutman Pepper Locke*, July 8, 2025.
- Co-author, “Treasury and IRS Release Updated Guidance on Energy Communities,” *Troutman Pepper Locke*, June 26, 2025.
- Co-author, “Tax Credit Implications of the One Big Beautiful Bill Act,” *Troutman Pepper Locke*, June 10, 2025.
- Co-author, “Transferable Inflation Reduction Act (IRA) Tax Credits: Considerations for Tax Credit Bridge Lenders,” *Secured Lender Magazine*, January/February 2025.
- Co-author, “Clean Energy Tax Credits Explained: The Section 45X Advanced Manufacturing Production Tax Credit,” *Thomson Reuters*, January 29, 2025.
- Co-author, “Treasury and IRS Issue Updated Domestic Content Guidance Under IRA and First Updated Elective Safe Harbor,” *Troutman Pepper Locke*, January 28, 2025.
- Co-author, “Treasury and IRS Issue Final Regulations on Clean Electricity Production and Investment Tax Credits,” *Troutman Pepper Locke*, January 23, 2025.
- Co-author, “IRS Issues Final Regulations on Clean Hydrogen Tax Credits,” *Troutman Pepper Locke*, January 15, 2025.
- Co-author, “IRS Issues Final Regulations on Energy Property and Rules Applicable to Energy Credit Under Section 48,” *Troutman Pepper*, December 11, 2024.
- Co-author, “IRS Issues Final Regulations on Section 45X Credits for Advanced Manufacturing Production Credit,” *Troutman Pepper*, October 31, 2024.
- Co-author, “Charging Ahead: Legal, Regulatory, and Operational Considerations for EV Infrastructure Development,” *Troutman Pepper*, October 1, 2024.
- Co-author, “IRS Issues Final Regulations on Prevailing Wages and Registered Apprenticeship Requirements,” *Troutman Pepper*, August 1, 2024.
- Co-author, “Fueling Up: How to Make U.S. Clean Hydrogen Projects Happen,” *Troutman Pepper*, June 25, 2024.
- Co-author, “Energy Communities’ Update May Clarify Tax Credit Eligibility,” *Law360*, June 17, 2024.
- Co-author, “Treasury and IRS Release Updated Guidance on Energy Communities,” *Troutman Pepper*, June 10, 2024.
- Co-author, “Treasury and IRS Issue Additional Domestic Content Guidance Under IRA and New Elective Safe Harbor,” *Troutman Pepper*, May 22, 2024.
- Co-author, “IRS Issues Final Regulations on Tax Credit Transfers,” *Troutman Pepper*, May 1, 2024.
- Co-author, “Energy Community Tax Credit Boost Will Benefit Wind Sector,” *Law360*, April 15, 2024.
- Co-author, “Treasury and IRS Release Further Guidance on Energy Community Enhancements Under IRA,” *Troutman Pepper*, March 26, 2024.
- Co-author, “IRS Issues Final Regulations on Direct Pay,” *Troutman Pepper*, March 8, 2024.
- Co-author, “IRS Launches Pre-Filing Registration Portal,” *Troutman Pepper*, January 3, 2024.

- Co-author, "[IRS Issues Proposed Regulations on Clean Hydrogen Tax Credits](#)," *Troutman Pepper*, December 29, 2023.
- Podcast, "[Analyzing the Impact of the IRA on Energy Storage](#)," *Battery + Storage Podcast*, December 21, 2023.
- Co-author, "[IRS Issues Proposed Guidance on Advanced Manufacturing Production Tax Credit Under IRA](#)," *Troutman Pepper*, December 21, 2023.
- Co-author, "[Guidance Suggests U.S. Clean Vehicle Subsidies Require Disengagement From China Supply Chains](#)," *Troutman Pepper*, December 13, 2023.
- Co-author, "[IRS Issues Proposed Regulations on Energy Property and Rules Applicable to Energy Credit Under Section 48](#)," *Troutman Pepper*, November 28, 2023.
- Co-author, "[IRS Issues Proposed Regulations on Prevailing Wage and Apprenticeship Requirements under the IRA](#)," *Troutman Pepper*, September 8, 2023.
- Co-author, "[Court Issues Perplexing Decision in \*Alta Wind\*](#)," *Troutman Pepper*, June 28, 2023.
- Co-author, "[IRS Issues Proposed Regulations on Direct Pay](#)," *Troutman Pepper*, June 20, 2023.
- Co-author, "[IRS Issues Proposed Regulations on Tax Credit Transfers](#)," *Troutman Pepper*, June 16, 2023.
- Co-author, "[Treasury and IRS Release Additional Guidance on Energy Community Enhancements Under IRA](#)," *Troutman Pepper*, June 16, 2023.
- Co-author, "[Updated IRS Guidance on Critical Minerals and Battery Components Has Demonstrable, Ongoing Implications for Domestic and Foreign EV Manufacturing](#)," *Troutman Pepper*, April 11, 2023.
- Co-author, "[Treasury and IRS Release Guidance on Energy Community Enhancements under the Inflation Reduction Act](#)," *Troutman Pepper*, April 5, 2023.
- Co-author, "[Treasury and IRS Release Guidance on Prevailing Wage, Apprenticeship, and Beginning of Construction Requirements Under the Inflation Reduction Act](#)," *Troutman Pepper*, November 30, 2022.
- Co-author, "[Keys to IRA Tax Breaks for U.S. Green Energy, EV Production](#)," *Law360*, November 16, 2022.
- Co-author, "[New IRA Tax Incentives for U.S. Manufacturing in Renewable Energy Sector](#)," *Troutman Pepper*, October 25, 2022.
- Co-author, "[No Carbon Copy: Six New Planning Considerations for Investors and Tax Counsels in Section 45Q Carbon Capture Deals in Light of the Inflation Reduction Act](#)," *Bloomberg Tax's Tax Management Memorandum*, September 2, 2022.
- Co-author, "[Highlights of the Revised Text of the Inflation Reduction Act of 2022](#)," *Troutman Pepper*, August 8, 2022.
- Co-author, "[Inflation Reduction Act Brings Back Energy and Climate Provisions From Build Back Better Act](#)," *Troutman Pepper*, July 28, 2022.
- Co-author, "[IRS Creates Fast-Track Pilot Program for Corporate Private Letter Rulings](#)," *Troutman Pepper Tax Update (Vol. 2022, Issue 1)*, February 17, 2022.
- Co-author, "[What Latest Build Back Better Draft Means for Green Energy](#)," *Law360*, November 10, 2021.
- Co-author, "[House Rules Committee Modifies Green Energy Bill](#)," *Troutman Pepper*, November 1, 2021.
- Co-author, "[California Clarifies Property Tax Exclusion for Solar Projects in Partnership Flips](#)," *Troutman Pepper*, October 4, 2021.
- Co-author, "[House Ways and Means Approves Green Energy Bill](#)," *Troutman Pepper*, September 17, 2021.
- Co-author, "[Direct-Pay Options: A Review of Recent Legislative Proposals](#)," *Troutman Pepper*, September 9, 2021.
- Co-author, "[IRS Rules on Section 45Q Eligibility for Separately Owned and Subsequently Installed Property at Qualified Facility](#)," *Troutman Pepper*, July 6, 2021.
- Co-author, "[IRS Further Extends Continuity Safe Harbor and Clarifies Methods for Satisfying the Continuity Requirement for Renewable Energy Projects](#)," *Troutman Pepper*, June 30, 2021.

## MEDIA COMMENTARY

- Quoted, "[Clean Energy Tax Credit Transfers Gather Steam — Slowly](#)," *Law360*, October 26, 2023.
- Quoted, "[IRS Energy Direct Pay Rules Take Some Projects 'Off the Table'](#)," *Bloomberg Law*, June 30, 2023.
- Quoted, "[New Tax Credit Rules May Not Simplify US Clean Energy Project Finance Deals](#)," *S&P Global*, June 26, 2023.
- Quoted, "[Energy Storage Projects Ready to Reap Tax Credit Rewards](#)," *Law360*, February 17, 2023.
- Quoted, "[5 Inflation Reduction Act Questions for the Energy Industry](#)," *Law360*, January 2, 2023.
- Quoted, "[3 More Open Questions About the Carbon Capture Tax Credit](#)," *Law360*, March 9, 2021.
- Quoted, "[3 Lingering Concerns About the Carbon Capture Tax Credit](#)," *Law360*, February 25, 2021.