

## Tsitsi M. Mangosho

Associate

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### OVERVIEW

Tsitsi assists clients who develop or invest in renewable energy projects. She advises clients on qualifying for energy tax incentives and structures a variety of transactions involving renewable energy projects. Tsitsi also advises on tax aspects of corporate and transactional matters such as mergers and acquisitions, various transactions involving partnerships, LLCs, and other passthrough entities.

### TOP AREAS OF FOCUS

- [Energy Tax](#)
- [Inflation Reduction Act of 2022 – Energy Industry Implications](#)
- [Renewable Energy](#)
- [Tax](#)

### EDUCATION AND CERTIFICATIONS

#### EDUCATION

- Harvard Kenneth C. Griffin Graduate School of Arts and Sciences, Ph.D., 2023
- Harvard Law School, J.D., 2022
- Midlands State University, M.A., 2012
- University of Zimbabwe, B.A., *with honors*, 2006

#### BAR ADMISSIONS

- New York

#### LANGUAGES

- Shona
- Ndebele

## PUBLICATIONS

- Co-author, "Treasury and IRS Issue FEOC Material Assistance Guidance," *Troutman Pepper Locke*, February 20, 2026.
- Co-author, "IRS Issues Proposed Regulations on Clean Fuel Production Credits," *Troutman Pepper Locke*, February 12, 2026.
- 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, "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, "IRS Issues Final Regulations on Prevailing Wages and Registered Apprenticeship Requirements," *Troutman Pepper*, August 1, 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.