



## Troutman Sanders Announces 2010 Tax Seminars

March 15, 2010

Troutman Sanders is pleased to announce the 2010 Troutman Sanders LLP Tax Seminars focusing on public utilities and producers of electric energy tax issues.

Each seminar will contain an intensive discussion of tax issues your company will face in preparing its 2009 tax returns, audit issues currently being raised by the Internal Revenue Service and other current issues. Attendees will receive a 200 page coursebook addressing tax issues important to regulated companies. Attached is a table of contents to this coursebook.

Important issues to be highlighted this year will include:

- Renewable energy credits under Code sections 45 and 48 and “Section 1603 Grants”
- Current penalty rules
- Contributions to capital under Code section 118(a)
- Repairs and casualty loss issues.

**CPE Credit:** This seminar has been registered with the National Association of State Boards of Accountancy.\* Each attendee will receive 7 hours of CPE credit.

**Speakers:** A combination of the following Troutman Sanders attorneys will conduct each session: Dave Jacobson, Howard Cooper, Ray Dacek, Robert Friedman, and Roger Reigner. These attorneys have long been considered to be leading industry experts on taxation of electric companies.

**Cost:** The charge for the entire program is \$575.00 per person with reduced rates for companies enrolling more than two people. A lunch is included as part of the program. Please contact us directly if you are interested in having an on-site seminar.

**How to Register:** Please contact Kathy Page (202-274-2812 or [katharine.page@troutmansanders.com](mailto:katharine.page@troutmansanders.com)) in our Washington office if you or others from your company plan to attend.

Please contact either Dave Jacobson (202-274-2914 or [david.jacobson@troutmansanders.com](mailto:david.jacobson@troutmansanders.com)) or Howard Cooper (202-274-2878 or [howard.cooper@troutmansanders.com](mailto:howard.cooper@troutmansanders.com)) if you should have questions.

The presentations begin at 9:00 a.m. and end at 4:30 p.m., and will be held in the following locations:

**Columbus, OH** Tuesday, April 13

American Electric Power Service Corporation  
Executive Dining Room, 31<sup>st</sup> Floor  
1 Riverside Plaza, Columbus, OH 43215

**Portland, OR** Tuesday, May 25

Location TBD

**Washington, DC** Tuesday, May 11

Troutman Sanders Office  
401 9<sup>th</sup> Street, N.W., 10<sup>th</sup> Floor  
Washington, DC 20004

**Chicago, IL** Thursday, May 27

Troutman Sanders Office  
55 West Monroe Street, Suite 3000  
Chicago, IL 60603

\*Troutman Sanders LLP is registered with the National Association of State Boards of Accountancy (NASBA) as a sponsor of continuing professional education on the National Registry of CPE Sponsors. State boards of accountancy have final authority on the acceptance of individual courses for CPE credit. Complaints regarding registered sponsors may be addressed to the National Registry of CPE Sponsors, 150 Fourth Avenue North, Suite 700, Nashville, TN, 37219-2417. Web site: [www.nasba.org](http://www.nasba.org).





## Troutman Sanders Seminar Faculty

**David Jacobson, Partner.** The bulk of David's practice consists of representing utility industry clients. He addresses IRS audit and appeals issues, secures private letter rulings, technical advice memoranda and permission to change methods of accounting from the National Office of the IRS and participates in tax litigation, tax planning and the structuring and evaluation of proposed transactions. He provides tax return review services to a large number of utility clients advising these companies regarding the appropriate positions to be reflected on income tax returns. David has served as an expert witness on tax matters in utility rate cases. In addition, David represents clients with respect to legislative and tax policy matters emanating from Capitol Hill, the IRS and the Department of Treasury. His knowledge and facility in this area is, at least in part, a function of his prior experience as tax counsel to the Senate Finance Committee and as attorney advisor in the office of chief counsel of the IRS.



**Howard Cooper, Partner.** Howard advises energy companies on a wide range of tax matters. This assistance includes controversy work against the IRS, providing tax-related planning advice to large corporate clients, and helping clients obtain the benefits of various tax incentives related to energy matters, including production tax credits, investment tax credits and accelerated depreciation. Howard is the editor of the Washington Developments Tax Service by which the firm advises companies from all segments of the utility industry on emerging legislative, administrative and judicial developments of particular relevance to electric companies. Howard also advises the Edison Electric Institute and electric utilities on legislative and regulatory matters and has been very involved in advising the industry on issues relating to electric energy and tax legislation. In addition, Howard advises a number of electric companies with respect to the issuance of tax-exempt bonds.



**Raymond Dacek, Of Counsel.** Ray is the best-known utility tax lawyer in the country. His electric utility company and law firm experiences afford him a practical insight into the tax concerns, practices and systems of utility companies. Ray serves as tax counsel to the Energy Tax Council and as a tax consultant to the Edison Electric Institute. He had served as tax counsel to the National Association of Electric Companies, which merged into Edison Electric Institute. He developed and continues to support an innovative Washington Developments Tax Service by which the firm advises from all segments of the utility industry on emerging legislative, administrative and judicial developments of particular relevance to the utility industry. Ray is an active participant on the utility tax scene, conducting "Tax Return Review" seminars and speaking at industry functions. He has also testified on tax matters in rate cases and has made presentations before the IRS and Department of Treasury on tax issues of relevance to the utility industry.



**Robert Friedman, Partner.** Robert advises clients on all aspects of corporate and partnership tax matters, with a particular emphasis on the tax aspects of private and public mergers, acquisitions, joint ventures, divestitures, private equity fund formation, financial products and electric and gas utility tax issues, including the structuring of fossil fuel and nuclear plant transfers. He represents clients in tax controversies with the IRS at the audit and appeals level and in connection with applications to the IRS National Office for private letter rulings, including with respect to nuclear decommissioning trust funds.



**Roger Reigner, Partner.** Roger practices in the areas of federal, state and local tax with an emphasis on the unique tax and accounting issues facing rate-regulated public utilities. Recent areas of concentration include renewable energy tax credits, the tax consequences of the acquisition and disposition of electrical generating facilities and associated assets, the tax consequences of contributions in aid of construction and other non-shareholder contributions to capital, property taxation of centrally assessed utilities, sales and use tax exemptions for plant and equipment and nuclear decommissioning trust funds. Roger has represented utility clients in numerous tax controversies with the IRS at the audit and appeals level and in the preparation of private letter rulings and technical advice for IRS National Office consideration. Although most controversies have been resolved at the administrative level, when necessary, Roger has represented clients in tax litigation before the U.S. Tax Court, the U.S. District Court, the Court of Appeals as well as state and local courts, boards and other tribunals.





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- IV. Expenses and Deductions (Other than Depreciation, Cost Recovery and Amortization).
- V. Capitalization, Depreciation, Amortization, Other Cost Recovery Rules and Changes in Methods of Accounting.
- VI. Carryback/Carryover Items.
- VII. Credits.
- VIII. Tax Rates, Estimated Tax, Refunds and Interest Netting.
- IX. Penalties and Disclosure Rules.
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