Energy Tax and Tax Credit Monetization

Skadden

Members of the Skadden Tax Group have significant experience planning and structuring transactions in the energy sector. We assist clients across the industry on projects that require sophisticated tax structuring advice, including with respect to tax equity, transferability and direct pay considerations. Attorneys in our energy tax practice have worked on developments, financings, refinancings, acquisitions and dispositions of energy projects and portfolios of all sizes in the U.S. and around the globe.

In coordination with Skadden's Energy and Infrastructure Projects Group, our tax attorneys have assisted numerous clients in evaluating, structuring and implementing novel transactions in the energy sector. Our attorneys are experienced in a wide range of clean energy technologies as well as coal, gas, LNG, manufacturing and decarbonization. In recent years, a primary area of focus has been renewable energy projects, many of which have been structured to utilize tax credits, grants and other governmental incentives designed to spur investment in renewable energy. We advise on all manner of tax equity and tax credit monetization transactions, including partnership flips, leases, hybrid structures and tax credit transfers. From development to commercial operation and beyond, we provide comprehensive advice on all facets of energy transactions.

Skadden's tax-related energy experience also involves assisting energy-focused clients with industry-specific issues, both in the transactional and planning context. In addition, clients turn to us to resolve large, complex and global tax controversy and litigation matters. We routinely advise clients in connection with tax controversy and litigation matters arising with respect to energy projects and the energy industry, including tax accounting matters, in all phases of the dispute resolution process (i.e., audits, appeals, mediation, arbitration and litigation).

Many of our attorneys have extensive tax-related administrative and policy experience and have formerly held senior and technical positions in the IRS, Department of the Treasury and White House, as well as on congressional tax writing committees. That experience enables our energy tax practice to react quickly in analyzing novel transaction structures and, where necessary, seek rulings or other government guidance to facilitate their prompt implementation.

Skadden's tax practice and its attorneys have been repeatedly recognized by leading industry outlets, including:

- *Chambers USA* as one of the top tax practices in Nationwide Corporate Tax and Nationwide Tax Controversy.
- *Law360* as a Tax Group of the Year since 2015.
- *International Tax Review*'s 2026 Americas Awards, including North America Tax Law Firm of the Year, Washington DC Tax Firm of the Year and Northern California Tax Firm of the Year.
- *Vault* as Best Law Firm for tax every year since 2010.
- *Lexology Index* as its 2025 Corporate Tax Team of the Year.
- *The Legal 500*, *International Tax Review* and *Best Lawyers*' Best Law Firms.

In addition, our Energy and Infrastructure Projects Group has been repeatedly honored as one of *Law360*'s Energy Groups of the Year. We are also recognized as a leading firm in the energy sector by *Chambers Global* and *Chambers USA*, which has called Skadden "a distinguished power practice."