# Build America's Energy Future: Labor Provisions in the Inflation Reduction Act

July 27, 2023

# Speakers

Webinar
COMBINED HEAT AND POWER ALLIANCE
SMACNA
SMART
Building America's Energy Future:
Labor Provisions in the Inflation Reduction Act
THURSDAY, JULY 27
1 PM ET
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GRASSI Advisors & Accountants
Tiffany Finck-Haynes
SMART
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Law Office of Liz Nadeau
Maggie Powers
SMACNA
Will Sherman
CHP Alliance (Moderator)

# SMART: who we are

- SMART, the International Association of Sheet Metal, Air, Rail and Transportation Workers, is one of North America’s most dynamic and diverse unions with 203,000 members.
- Our members ensure the quality of the air we breathe and promote energy efficiency.


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SMART®

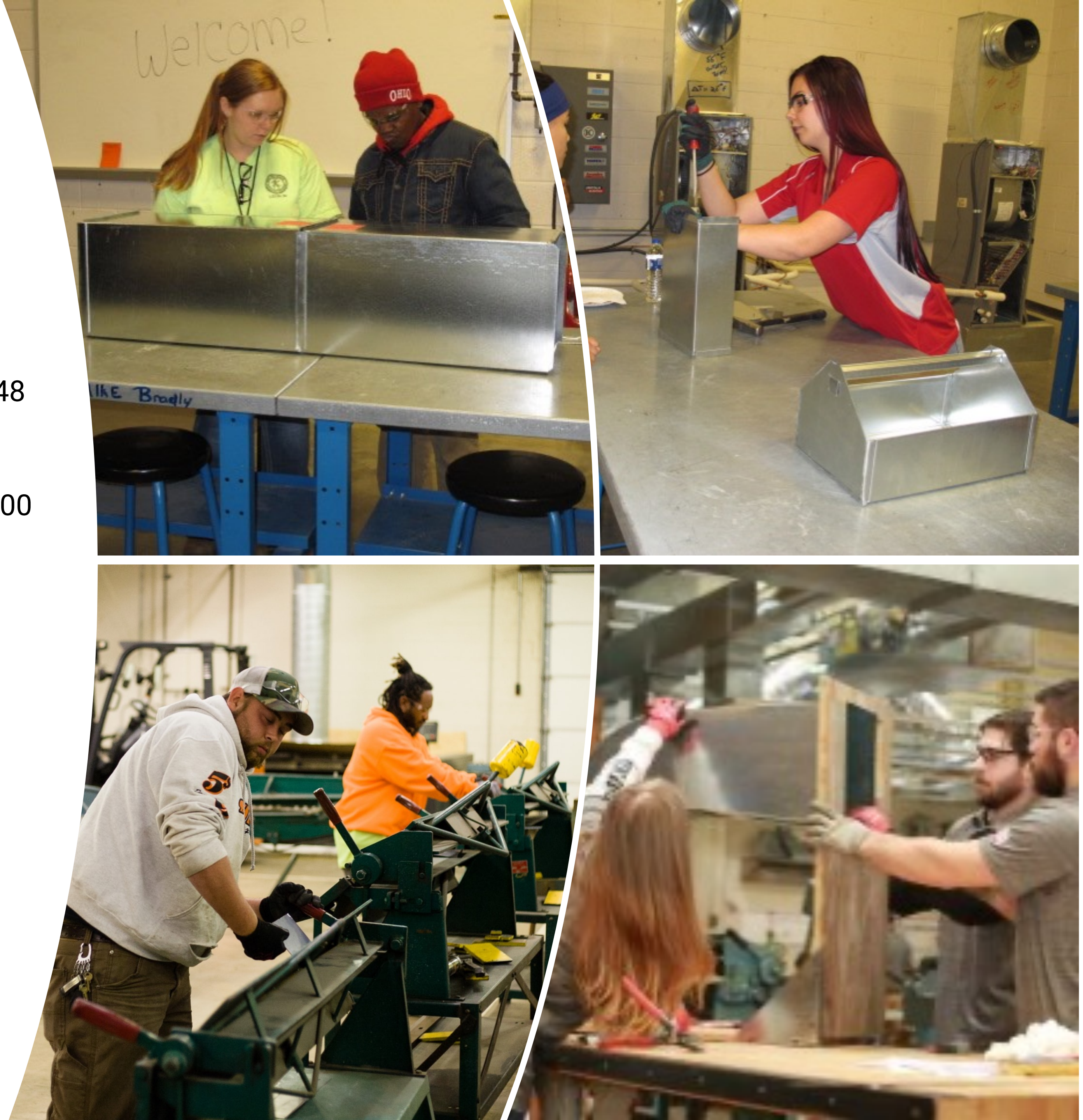
# SMACNA: who we are

- The Sheet Metal and Air Conditioning Contractors' National Association is an international trade association representing 3,500 signatory contractors with more than 100 chapters.
- SMACNA is well-known for its standards development work, which is designed to increase productivity and efficiency in building systems.

SMACNA

# SMART & SMACNA: registered apprenticeship and pre-apprenticeship programs

- SMART and SMACNA jointly sponsor 148 Joint Apprenticeship and Training Committees (JATC) in the U.S.
- We recruit apprenticeships from the 1,800 pre-apprentices that participate in local programs.



# SMART HEROES

- SMART Heroes help veterans transition to civilian life.
- SMART Heroes provides full-time training for seven weeks for a total of 224 hours prior to discharge.
- Upon completion of training and discharge from service, a graduate can select any of the 148-sheet metal JATCs in the U.S., with advanced placement as a second-year apprentice.


# Investment Tax Credit (ITC) – IRC Section 48

- General:
  - ITC is a credit that can be claimed on federal corporate income taxes equal to certain percent of the cost of eligible renewable energy property.
  - Credits available to taxable businesses as well as certain tax-exempt entities eligible for direct payment of tax credit
  - The tax credit rate depends on the type of property or technology for which the credit is being claimed as well as applicable construction and date place in service.
  - Equipment must be new – original use is with taxpayer or originally constructed by taxpayer and must meet applicable performance or quality standards at that time.

# Investment Tax Credit (ITC) – IRC Section 48

- ITC is calculated by multiplying applicable tax percentage by amount invested in eligible property. % is determined based on **commencement of construction date** and claim based on **date placed in service**.
- Commencement of construction can be established by either incurring 5% of the total eligible costs of the project, or by commencing actual physical construction of the project.
- ITC is extended through 2024 by the Inflation Reduction Act

# Investment Tax Credit (ITC) – IRC Section 48

- Bonus credit if following are met:
  - Domestic content minimums (+10%)
  - Siting in energy community (+10%)
  - Siting in low-income communities or on Indian lands (+10%)
  - Qualified low-income residential building. (+20%)

# Investment Tax Credit (ITC) – IRC Section 48

## Summary of Investment Tax Credit (ITC) and Production Tax Credit (PTC) Values Over Time

| | | | Start of Construction | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| | | | 2006 to 2019 | 2020 to 2021 | 2022 | 2023 to 2033 | The later of 2034 (or two years after applicable year [a]) | The later of 2035 (or three years after applicable year [a]) | The later of 2036 (or four years after applicable year [a]) |
| ITC | **Full rate** (if project meets labor requirements [b]) | Base Credit | 30% | 26% | 30% | 30% | 22.5% | 15% | 0% |
| | | Domestic Content Bonus | | | | 10% | 7.5% | 5% | 0% |
| | | Energy Community Bonus | | | | 10% | 7.5% | 5% | 0% |
| | **Base rate** (if project does not meet labor requirements [b]) | Base Credit | 30% | 26% | 6% | 6% | 4.5% | 3% | 0% |
| | | Domestic Content Bonus | | | | 2% | 1.5% | 1% | 0% |
| | | Energy Community Bonus | | | | 2% | 1.5% | 1% | 0% |
| | **Low-income bonus** (1.8 GW/yr cap) | <5 MW projects in LMI communities or Indian land | | | | 10% | 10% | 10% | 10% |
| | | Qualified low-income residential building project / Qualified low-income economic benefit project | | | | 20% | 20% | 20% | 20% |

# Advance Energy Project Credit (AEP) – IRC Section 48C

- Extends credit originally offered through the *American Recovery and Reinvestment Act of 2009*. F/K/A – Advanced Manufacturing Tax credit (AMTC)
- AMTC issued a *30% tax credit that was valued at $2.3B* and was largely oversubscribed by the manufacturer's applications filed
- The advanced energy project credit is a competitively awarded *investment tax credit for clean energy and energy efficiency manufacturing projects*
- The current *48C Advanced Energy Project Credit* provides for as much as *$10B in new 30%* Investment Tax Credits (ITC) and *broadens what is deemed eligible* energy property that a company can invest in to earn the credit.

# Advance Energy Project Credit (AEP) – IRC Section 48C

- Unlike many other tax credits in the IRA, this is a *competitive tax credit program* – requires manufacturers *must apply* in order to receive an allocation
- Program gives a *preference (40% of credits or $4B) to projects* located in certain census tracts that historically relied on the coal industry for jobs and economic security.
- Credit value is **30% of the project capital investment** that is deemed to be eligible energy property, to incentivize clean energy manufacturing.
- Credit is basically comprised of 2 pieces – *base credit of 6%* and then *24% additional*, if wage and apprenticeship requirements are met

# Advance Energy Project Credit (AEP) – IRC Section 48C

- Conversely *reduces the credit rate by 80%* if Prevailing Wage and Apprenticeship (PWA) requirements are not met
- Inflation Reduction Act Two General Concepts:
  1) Base Credit + Additional Credit if certain Requirements are met = Total Credit
  2) Prevailing wage & apprenticeship requirements
- Effective after 12/31/22, but first round or credits will not be available to be actually taken until 3/31/24

# Advance Energy Project Credit (AEP) – IRC Section 48C

- First Round - $4B – Concept paper submittal closes July 31, 2023; IRS will make final allocation decisions by March 31, 2024
- Second Round - $6B – later date TBD; sometime Fall 2023 – Winter 2024
- Ultimately receive certification from the IRS for the investment tax credit allocation for your project.
- Complete Project
- Enjoy credit!

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# Advance Energy Project Credit (AEP) – IRC Section 48C

*What's the Process?*

1. Concept Paper
   - Apply – concept paper submitted describing the project to the Department of Energy (DOE) by due date
   - After submission of concept paper, DOE will send out letter of reasonable expectation of commercial viability and merits or will send letter of discouragement – either way if you submitted concept paper and received DOE response, you are eligible for next step: submitting an application.

# Advance Energy Project Credit (AEP) – IRC Section 48C

- *Concept Paper Requirements:*
  - Be clear that project satisfies eligibility requirements
  - Meets definition of qualified advanced energy project
  - Has reasonable expectation of commercial viability
  - Interactive process which you must be open and forth coming
  - Note if plans for project change significantly after the project's concept paper and application have been submitted, it would be considered ineligible for that round

# Advance Energy Project Credit (AEP) – IRC Section 48C

2. Application
   - Submit Application - covers both DOE recommendation and IRS certification, submittal date TBD by DOE
   - DOE then reviews application for compliance and technical qualifications and will recommend to the IRS either a Accept or Reject. Rejections at this stage can get DOE debriefings
   - Taxpayers seeking the full 30% higher rate MUST confirm with applications and when they have placed their project in service that they intend to and actually have met the PWA rules.

# Advance Energy Project Credit (AEP) – IRC Section 48C

3. IRS Credit Allocation
    - Utilizing DOE acceptances, IRS prioritize projects approved and will make decision whether or not to allocate AEP credits to the project.
    - Projects that do not make first round cut may be considered for second round of credit allocations.

4. Notification of Certification Satisfaction
    - Taxpayers that receive allocations will have 2 years to notify DOE and provide proof that they have satisfied certification requirements, and then have 2 more years to place project into service.
    - DOE then notifies the taxpayer and the IRS that it has received the taxpayers notification and that the certification requirements have been met.
    - IRS certifies the project by sending a Certification Letter (the “Allocation Letter”)

# Advance Energy Project Credit (AEP) – IRC Section 48C

5. Place Project in Service
   - The taxpayer has 2 years from issuance of Allocation Letter to place project in service and notify DOE

6. Claim Tax Credit
   - Tax credit is claimed on the tax return for the taxable year in which the project was placed in service.

- *Withdrawal of Application – must be done formally through exchange portal*

# Advance Energy Project Credit (AEP) – IRC Section 48C

- *Observations / Practical Points:*
  - Start early so you can make sure you present strongest case possible for your project
  - Register on submission website – do not have to wait until submission is ready
  - Application process is expected to be very competitive. 2009 $2.3B=>500 applications of $8B of credit requests
  - Once all $4B in round one are exhausted; any remaining projects will be resubmitted for round 2
  - Interactive process – material changes / non-compliance will be frowned upon and may jeopardize credits

# Advance Energy Project Credit (AEP) – IRC Section 48C

- *Observations / Practical Points:*
  - If not eligible for other IRA credits, may be given priority consideration
  - Associations with foreign countries might not receive recommendations - disclosure
  - Known fact – applications will be ranked based on program goals:
    - Avoidance or reduction of greenhouse gas emissions
    - Benefit to the community
    - Strengthen US industrial competitiveness and clean energy supply chains

# Advance Energy Project Credit (AEP) – IRC Section 48C

- *Qualifying AEP Credit Projects:*
  - *Projects that re-equip, expand or establishes an industrial or manufacturing facility that produces or recycles "specified advanced energy property":*
    - Energy form the sun; water; geothermal deposits or other renewable resources
    - Fuel cells, microturbines or energy storage systems and components
    - Electric grid modernization equipment or components
    - Property designed to capture, transport, remove, use or sequester carbon oxide emissions
    - Equipment designed to refine, electrolyze or blend any fuel, chemical or product that is renewable
    - Property designed to produce energy conservation technologies
    - Electric, Hybrid, or fuel cell vehicles, as well as component materials
    - Advanced energy property designed to reduce greenhouse gas emissions

# Credit Transferability

- The following are generally eligible to transfer tax credits:
  - tax-exempt organization,
  - State or political subdivision,
  - a local government,
  - an Indian tribal government,
  - an Alaska Native Corporation,
  - the Tennessee Valley Authority,
  - a rural electric co-op,
  - a U.S. territory, or
  - an agency or instrumentality of a state, local, tribal, or territorial government.

# Credit Transferability

- The following credits are eligible for transfer:
  - Energy Credit (48), (Form 3468, Part VI)
  - Clean Electricity Investment Credit (48E), (Form 3468, Part V)
  - Renewable Electricity Production Credit (45), (Form 8835, Part II)
  - Clean Electricity Production Credit (45Y),
  - Zero-emission Nuclear Power Production Credit (45U), (Form 7213, Part II)
  - Advanced Manufacturing Production Credit (45X), (Form 7207)
  - Clean Hydrogen Production Credit (45V), (Form 7210)
  - Clean Fuel Production Credit (45Z)
  - Carbon Oxide Sequestration Credit (45Q), (Form 8933)
  - Credit for Alternative Fuel Vehicle Refueling/Recharging Property (30C), (Part 8911, Part II)
  - Qualified Advanced Energy Project Credit (48C), (Form 3468, Part III)
- A portion of an eligible credit can be transferred but not if it’s only related to the bonus credit (prevailing wages requirement that qualify for the extra credit)

# Credit Transferability

- The following are the steps for transferring the credit:
  - Pursue eligible project
  - Complete electronic pre-filing registration with the IRS (More information on how to do so will follow in late 2023)
  - Satisfy requirements necessary for eligible credit, i.e.: place the project in service
  - Arrange to transfer the eligible credit to an unrelated party in exchange for cash only.
  - Provide transferee with registration number and all relevant information needed for them to claim the credit.
  - Complete a transfer election statement with the buyer
  - Disclose on tax return that the credit has been transferred to unrelated party and attach election statement as well as the registration number
- For credits that require recapture, the transferor is required to notify the transferee if recapture event occurred so the transferee can properly recapture the credit on their return in the year of recapture.

# <u>Tax Planning *Golden Nugget #1*</u>

1) <u>Bonus Depreciation</u> – 2022 remaining at 100 phases out over the following four years:  80% in 2023, 60% in 2024, 40% in 2025, and 20% in 2026

2) <u>Section 179</u> - For tax years beginning in 2022, the Section 179 deduction limit has been, inflation adjusted, raised to $1,080,000. The monetary limit on equipment purchases is now $2,700,000. This will increase through 2026 for inflation.

3) <u>Cost Segregation Study</u> – Real Estate Industry biggest win fall, but still significantly utilized

4) <u>Cost Recovery for Qualified Facilities, Qualified Property, and Energy Storage Technology</u> – IRC Section 168(e)(3)(B) – very specific specialized property

# Tax Planning *Golden Nugget #2*

*CREDITS*...........

1) Research & Development Credits ("R&D CREDITS")
2) Energy Efficient Home Credit (IRC 45L)
3) Production Tax Credit (IRC Section 45)
4) Energy Investment Tax Credit (IRC Section 48)
5) Carbon Oxide Sequestration Credit (IRC 45Q)
6) Zero Emission Nuclear Power Production Credit (IRC 45U)
7) Alternative Fuels and Second-Generation Bio-Fuel Credit (IRC 40A)
8) Sustainable Aviation Fuel Credit (IRC 40)
9) Production of Clean Hydrogen Credit (IRC 45V)

# Tax Planning *Golden Nugget #2(continued)*

*CREDITS*………..

10) Non-Business Energy Property Credit (IRC 25C)

11) Residential Energy Efficient Property Credit (IRC  25D)

12) Electric Drive Motor Vehicle Credit (IRC 30D)

13) Qualified Commercial Clean Vehicles Credit (IRC 45W)

14) Alternative Fuel Vehicle Refueling Property Credit (IRC 30C)

15) Advance Energy Project Credit (IRC 48C)

16) Advance Manufacturing Production Credit (IRC 45X)

17) Clean Energy Production Credit (IRC 45Y)

18) Clean Energy Investment Credit (IRC 48E)

# Tax Planning *Golden Nugget #3*

*DEDUCTIONS*..........

1) Energy Efficient Commercial Building Deduction – (IRC Section 179D) ☐

2) Job Costing – (IRC Section 460) ☐

*CREDIT OTHER*........

1) Employee Retention Credit (ERC) ☐

# Prevailing Wage Requirements

# What is the Federal "Prevailing Wage" in the Construction Industry?

- Prevailing wage laws set a "floor" on the hourly rates of pay and fringe benefits (FBs) that contractors must pay works on covered projects.
- PWs are more likely to be based on union rates in counties with higher union density
- PWs are more likely to be based on open shop rates in counties in the South, for example
- Open shop contractors working on covered projects are required to pay union rates when union rates prevail

# History of Federal Prevailing Wage Law in the Construction Industry

- The federal prevailing wage law, known as the Davis-Bacon Act, was passed in 1931, and is designed to protect construction workers from low ball bidders on covered projects, and thereby, depress prevailing rates
- The DBA covers contracts with a federal agency (e.g., Army Corps of Engineers, DOE, NASA, etc.) or the District of Columbia for construction, alteration, or repair, with a project value of $2,000
- Examples: VA hospitals, federal courthouses  and administrative buildings, army reserve facilities, etc.

# Davis-Bacon and Related Acts

- Congress has passed more than 60 Davis-Bacon Related Acts (DBRA), which extend DB protection to covered federally funded or federally assisted projects (e.g., housing, schools, and highways)
- Infrastructure Investment and Jobs Act (IIJA) and the CHIPS and Science Act are two examples of DBRAs that Congress recently enacted
- The Inflation Reduction Act is not DBRA. Taxpayers have the option to forego tax credits and deductions if they choose not to pay prevailing rates of pay.

# How Does the U.S. DOL Determine Prevailing Rates of Pay?

- The U.S. DOL conducts surveys of wages and fringe benefits to determine prevailing rates of pay and fringe benefits for 4 types of construction:
  - Residential, Building, Heavy, and Highway.
- The U.S. DOL bases the prevailing rates on the data submitted and issues them on a county-by-county basis.
- The goal is to issue rates for each work classification on a county-by-county basis. However, when data are insufficient for one or more classification, a wage schedule may exclude some key classifications (e.g., sheet metal worker, plumber, electrician, and bricklayer)

# Prevailing Wage Requirements in the IRA

- Taxpayer must ensure that any laborers and mechanics employed by the taxpayer or any contractor or subcontractor for the construction, alteration, or repair of a "qualified facility" are paid not less than the prevailing rates of pay "as most recently determined by the Secretary of Labor." IRC 45(b)(7)(A).
- On 48C projects: The IRA requires that laborers or mechanics involved in "the re-equipping, expansion, or establishment of a manufacturing facility that is part of a qualifying advanced energy project" must be "paid wages at rates not less than the prevailing rates for construction, alteration, or repair … IRC § 48C(e)(5)(A).
- "Rates of pay" include FBs, such as pension, health, apprenticeship and training, and vacation

# Additional Guidance

- On Nov. 30, 2022, Treasury and the IRS issued initial guidance, which clarifies the prevailing wage and apprenticeship utilization requirements in IRA.
- Treasury and the IRS will release further guidance following their issuance of proposed regulations and an opportunity to submit public comments.

# Taxpayer's Duties Regarding Payment of Prevailing Rates

- Situation A: A taxpayer directly employs workers and also uses a contractor and/or subcontractor to construct the facility.
- Situation B: The taxpayer employs no "laborers or mechanics" and uses a contractor and/or subcontractor to construct the facility.
- Regardless of whether the taxpayer is the direct employer, it must ensure that the taxpayer, contractor, and subcontractor pay the applicable prevailing rates in the wage determination (WD) for each classifications listed in the WD in the county where the facility is located.

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# What Happens When the WD Fails to Include a Labor Classification Called for on the Project?

- If the WD does not include wage rates for one or more classification of work (e.g., sheet metal worker), the taxpayer should seek assistance from the Wage and Hour Division (WHD) of the U.S. DOL at IRAprevailingwage@dol.gov

- The taxpayer must provide the WHD with 1) the type of facility, 2) its location, 3) proposed labor classification(s), 4) proposed wage rates, 5) job descriptions and duties, and 6) any rationale for the proposed classifications.

- The WHD is responsible for reviewing and approving the proposed rates and classifications.

# Using the Most Recent Wage Determination

- Taxpayer Contracts with a Prime Contractor:  The taxpayer should use the most up to date WD at the time it enters into the contract with the prime contractor.

- Taxpayer Self-Performs:  The taxpayer should use the most up to date WD available at the time the work is commenced.

- See U.S. DOL's PowerPoint presentation, "Inflation Reduction Act Prevailing Wage and Apprenticeship Requirements": https://www.dol.gov/sites/dolgov/files/WHD/IRA-presentation.pdf

# Taxpayer's Duties Regarding Recordkeeping

- The taxpayer must maintain records that are sufficient to establish that no less than prevailing wage rates were paid. Such records must identify the following information:
  - the applicable WD,
  - laborers and mechanics who performed construction work on the facility,
  - classifications of work performed,
  - hours worked in each classification, and
  - wage rates paid for the work.

# Correction and Penalty Mechanisms

- Taxpayers that fail to satisfy the prevailing wage requirement can correct their failure if they:
  - pay each worker the difference between actual wages paid and the prevailing wage (increased to 3x the difference if the taxpayer intentionally disregarded the rules) plus interest, and
  - if they pay a $5,000 penalty to the Secretary of the Treasury for each worker paid below the prevailing wage (increased to $10,000 if the taxpayer intentionally disregarded the rules).

# Apprenticeship Utilization Requirements

# Apprenticeship Participation Requirements

- Each taxpayer, contractor, or subcontractor who employs 4 or more individuals to perform construction, alteration, or repair work with respect to the construction of a qualified facility must employ 1 or more "qualified apprentices" to perform such work.
- "Qualified apprentices" are employed by the taxpayer or by any contractor or subcontractor and participate in a registered apprenticeship program (RAP).

# Apprenticeship Labor Hour Requirements

- The utilization requirements increase as follows:
  - 12.5% for facilities that begin construction on or after Jan. 29, 2023, and before Jan. 1, 2024
  - 15% for facilities that begin construction after Dec. 31, 2023
- "Labor hours" exclude any hours worked by forepersons, superintendents, owners, or persons employed in a bona fide executive, administrative, or professional capacity.

# Apprentice Ratio Requirements

- The apprenticeship labor hour requirements are subject to any applicable requirements for apprentice-to-journeyworker ratios of the U.S. DOL or the applicable State Apprenticeship Agency.

# Good Faith Effort Exemption

- A taxpayer satisfies the apprenticeship requirements with respect to a qualified facility if the taxpayer has requested "qualified apprentices" from a RAP AND
  - The request is denied, provided that the denial is not the result of a refusal by the taxpayer or any contractors or subcontractors to comply with the established standards and requirements of the RAP, OR
  - The RAP fails to respond to a request within 5 business days after the date on which the RAP received the request.

# Shortage of Apprentices

- If a RAP is unable to refer an apprentice(s) for a project  due to a shortage and/or competing demands for apprentices, the taxpayer would satisfy the good faith exemption if it makes a request and the request is denied by the RAP.
- This is true regardless of whether the taxpayer, contractor, or subcontractor is signatory to a CBA. Signatory contractors may rely on the good faith exemption.

# Example in Guidance for Calendar Year 2023

- Construction of a facility requires 10,000 labor hours
- Taxpayer’s apprentices perform a total of 1,150 hours
- A contractor performed 1,000 labor hours, with 100 hours of work performed by apprentices
- Assuming that the ratios are satisfied, the taxpayer would meet the 12.5% utilization requirement for projects beginning in 2023

# Penalties for Noncompliance with Apprenticeship Utilization

- Penalty in an amount equal to the product of $50 multiplied by the total labor hours for which the requirements were not satisfied with respect to the construction, alteration, or repair work on a qualified facility.
- Intentional Disregard Provision: The penalty for intentional disregard of requirements is $500 instead of $50

# Recordkeeping Requirements

- The taxpayer must maintain books of account or records for contractors or subcontractors, as applicable, in sufficient form to establish that the Apprenticeship Labor Hour, the Apprenticeship Participation, Apprenticeship Ratio Requirements have been satisfied.

# Additional Benefits to Union Contractors Under the IRA

# Additional Benefits to Signatory Contractors under the IRA

- **Bidding Process**: Union contractors have an improved ability to compete in the bidding process since taxpayers are eligible for enhanced tax deductions by meeting labor standards.
- **Protection of High Standards**: the IRA enables contractors that contribute to high quality training to compete effectively for projects by leveling the playing field.
- **Create a Pipeline for Skilled Labor**: the IRA creates a unique framework that incentivizes apprenticeship and skill-building investments through government spending

# Resources

# Initial Guidance from IRS and Treasury Dept.

1. Internal Revenue Service, Treasury, Notice of Initial Guidance, *Prevailing Wage and Apprenticeship Initial Guidance Under Section 45(b)(6)(B)(ii) and Other Substantially Similar Provisions*, 87 *Fed.Reg.* 73580 (Nov. 30, 2022) https://www.govinfo.gov/content/pkg/FR-2022-11-30/pdf/2022-26108.pdf

2. Correction to Notice: https://www.govinfo.gov/content/pkg/FR-2022-12-07/pdf/2022-26549.pdf

3. SMART and SMACNA's joint comments concerning labor standards in the IRA

# IRS and Treasury Dept.

1. Notice 2022-48, Request for Comments on Incentive Provisions for Improving the Energy Efficiency of Residential and Commercial Buildings: https://www.irs.gov/pub/irs-drop/n-22-48.pdf

2. SMART and SMACNA's joint comments in response to questions raised in Notice 2022-48

# IRS Guidance on 48C(e)

1. Notice 2023-18, Initial Guidance Establishing Qualifying Advanced Energy Project Credit Allocation Program Under Section 48C(e): https://www.irs.gov/pub/irs-drop/n-23-18.pdf

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# White House

1. White House, Building a Clean Energy Economy: A Guide to the Inflation Reduction Act's Investments in Clean Energy and Climate Action: https://www.whitehouse.gov/wp-content/uploads/2022/12/Inflation-Reduction-Act-Guidebook.pdf

# U.S. Department of Labor

1. Prevailing Wage and the Inflation Reduction Act: https://www.dol.gov/agencies/whd/IRA

2. Employment and Training Administration, Office of Apprenticeship, Circular 2021-02 (Jan. 12, 2021), *Guidelines for Reviewing Apprentice to Journeyworker Ratio Requests:* https://www.apprenticeship.gov/about-us/legislation-regulations-guidance/circulars

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# American Council for an Energy-Efficient Economy

1. Policy Brief, Commercial Building Incentives: Programs for new construction and upgrades in the Inflation Reduction Act and other recent federal laws: https://www.aceee.org/sites/default/files/pdfs/commercial_building_incentives_2-1-23.pdf

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# Q&A Discussion

# Thank You!

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