

F O R U M D R A F T A G E N D A

Tuesday, April 23, 2024

8:15 am - 8:30 am

Welcome

Heather Crowder, Vice President and General Tax Officer, P66

Aindriu Colgan, Director of Tax and Trade Policy, API

8:30 am - 9:30 am

Washington Update – Tax Policy Developments

Sarah Shive, Partner, Capitol Tax Partners LLP

Katherine Mongé, Partner, Capitol Tax Partners LLP

Jake Triolo, Partner, Capitol Tax Partners LLP

Description: The panel will provide an update on current tax-policy legislation in Congress and the outlook heading into the 2024 election. The discussion will also focus on regulatory implementation of recent energy-tax legislation, including the Inflation Reduction Act, and potential Treasury and IRS guidance in the near and longer term.

9:30 am – 10:30 am

Litigation and Tax Controversy Update

George Hani, Member, Miller & Chevalier Chartered

Caroline Reaves, Counsel, Miller & Chevalier Chartered

Description: This panel will discuss the IRS enforcement efforts to utilize the economic substance doctrine, and the related penalty, to attack tax benefits. The discussion will include a review of recent cases as well as the relaxed procedural hurdles for LB&I exam teams to raise the doctrine and propose the penalty.

10:30 am – 10:50 am

Break

10:50 am - 12:00 pm

Accounting and Compliance: Everything you need to know for reporting in 2024 and beyond

David Grimes, Federal Tax Director, PwC

Justin Femmer, PwC

Bret Oliver, Partner, PwC

Marc Caillouet, PwC

Description: This panel will discuss the various developments in accounting and reporting from technical issues, such as the reporting for the IRA credits to Pillar II and GloBE returns.

12:00 pm – 1:15 pm

Lunch

1:15 pm – 2:30 pm

Pillar 2 – Update from the OECD

Ronald Dabrowski, Technical Deputy, KPMG

Kevin Brogan, Principal, KPMG

Quyen Huynh, Principal, KPMG

Description: This course will cover everything you need to know about the GloBE Model Rules' Pillar from the perspective of the OECD, including what has been decided, what remains to be decided, timelines, and points of disagreement. It will also review the status of other countries' efforts to implement Pillar 2.

2:30 pm – 3:40 pm

Pillar 2 – A U.S. Perspective

Nita Asher, Principal, PwC

Shannon Baran, Partner, PwC

Owen Holladay, Director, PwC

Mike Schlessinger, Managing Director, PwC

Description: This course will cover everything you need to know about Pillar 2 from the U.S. perspective—including how model rules will affect U.S. companies, key considerations, and timelines for compliance. It will also review how Treasury and Congress are and plan to address the agreement.

3:40 pm – 3:50 pm

Break

3:50 pm – 5:00 pm

Transferability: Key Considerations for the Oil and Renewable Natural Gas and Renewable Fuels under the Inflation Reduction Act

Bryce Presentin, Tax Underwriter & Senior Vice President, Euclid Transactional

Joe Reese, Vice President & Chief Tax Officer, NextEra Energy

Michael Marino, Vice President US Energy Investment Banking, EY

Description: This panel will cover everything you need to know about transferability and monetization of tax credits under the Inflation Reduction Act, including the transfer/sale of tax credits, insurance, equity arrangements, and tax credit integrity.

5:00 pm

Networking Reception

Wednesday, April 24, 2024

8:30 am – 9:30 am

Committee on Tax Meeting

9:30 am – 9:45 am

Valedictory Remarks

Stephen Comstock, Vice President, API

9:45 am – 10:35 am

CAMT Update

Matt Donnelly, Partner, Gibson Dunn

Josiah Bethards, Associate Attorney, Gibson Dunn

Description: This course will cover everything you need to know about the Corporate Alternative Minimum Tax, including an update on regulations and key considerations for the oil and gas industry.

10:35 am – 11:40 am

Sustainability Incentives

Melissa Theilig, Senior Manager, EY

Victoria Vaughan, Senior Manager, EY

Description: A process-driven discussion will analyze the steps oil and gas industry can take to capitalize on sustainability-related incentives, exemptions and fundings to drive growth, boost efficiency, and future-proof their internal tax function.

11:40 am – 11:45 am

Break

11:45 am – 12:45 pm

45V – Key Considerations and Current Issues

Hannah Hawkins, Principal, KPMG

Julie Chapel, Director, KPMG

Shine George, Senior Tax Counsel, Chevron

Description: This panel will cover everything you need to know about 45V, including an overview of guidance and regulations and key considerations when planning for the tax credit.

1:15 pm – 2:30 pm

Lunch

2:30 pm – 3:30 pm

SAF Update – 40B and 45Z

Jennifer Speck, Partner, Bracewell

Jeremy DeMuth, Managing Director, Deloitte

SaraBeth Smith, Deloitte

Description: This panel will cover everything you need to know about tax credits for Sustainable Aviation Fuel—both 40B and 45Z. It will review recent guidance and regulations, the transition from the excise to income tax credit, as well as key considerations for the oil and gas industry, including models, carbon intensity programs, and considerations for the oil and gas industry, including carbon intensity, and interplay with other federal income tax credits.

3:30 pm – 3:40 pm

Break

3:40 pm – 5:00 pm

Practical Considerations in the M&A Environment

James Toups, Managing Director, Deloitte

Lauren Reichenau, Managing Director, Deloitte

Kevin Smith, Senior Manager, Deloitte

Katie Bieger, Senior Manager, Deloitte

Description: A discussion around common tax issues that arise in conjunction with asset and stock purchases in the energy space. In addition, the discussion will include issues to be wary of as well as reporting considerations on the relevant tax returns.

Thursday, April 25, 2024

7:30 am – 10:30 pm **Auditor Manager's Meeting**

10:30 am Adjourn