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, Capitol Tax Partners LLP
Katherine Mongé, Capitol Tax Partners LLP
Jake Triolo, 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, Miller & Chevalier Chartered
Caroline Reaves, Miller & Chevalier Chartered
Description: This panel will survey notable tax audit and controversy developments, including the successor to Rev. Proc. 94-69 disclosures, an uptick in challenges under the codified economic substance doctrine, heightened scrutiny of R&E credit claims, and a wave of litigation challenges to the validity of regulations.

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, PwC
Bret Oliver, PwC
Description: TBD

12:00 pm – 1:15 pm  Lunch

1:15 pm – 2:30 pm  Pillar 2 – Update from the OECD
Ronald Dabrowski, 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**  
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**  
Greg Matlock, 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

9:45 am – 10:35 am  **CAMT Update**  
Matt Donnelly, 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, KPMG

*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, Bracewell
Jeremy DeMuth, 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 and integration with state level LCFS programs.

3:30 pm – 3:40 pm  Break

3:40 pm – 5:00 pm  **Practical Considerations in the M&A Environment**
James Toups, Deloitte
Lauren Reichenau, Deloitte
Kevin Smith, Deloitte
Katie Bieger, 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