

# **Structuring Tax Subsidies for the Energy Industry**

Tracey M. Roberts

**ABA Joint Fall CLE Meeting  
Sections of Taxation, Real Property and Real Estate  
Law**

September 17-19, 2015



# Quantitative Comparison of Tax Subsidies

---

Period	Fossil Fuels	Renewables
2010 - 2014	\$19.5B	\$10.5B
2013 - 2017	\$27.6B	\$14.1B
2014 - 2018	\$35.1B	\$18.6B



# Qualitative Comparison of Tax Subsidies

<b>FOSSIL FUELS (PTPs)</b>	<b>RENEWABLES (Tax Credits)</b>
Low Transaction Costs	High Transaction Costs
Low Information Costs	High Information Costs
High Liquidity	Low Liquidity / Lock-in
Low Legislative Risk	High Legislative Risk
Low Technology Risk	High Technology Risk
Imbedded	Extraneous