

Announcement of the Results of the 2012-2013 Phase III Allocation Round of the Qualifying Advanced Coal Project Program

Announcement 2013-43

This announcement discloses the results of the 2012-13 allocation round under the qualifying advanced coal project program of § 48A of the Internal Revenue Code.

SECTION 1. QUALIFYING ADVANCED COAL PROJECT PROGRAM

Pursuant to § 48A(d)(4), on July 19, 2012, the Internal Revenue Service (the “Service”) issued Notice 2012-51, 2012-2 C.B. 150 (the “Notice”) to establish the § 48A Phase III qualifying advanced coal project program (the “Phase III program”) and to allocate § 48A credits (the “Phase III credits”) in the total amount of \$658,500,000. The Notice provides that the credit for a taxable year under the Phase III program is an amount equal to 30 percent of the qualified investment for that taxable year in a qualifying advanced coal project that uses integrated gasification combined cycle technology or other advanced coal-based generation technology. To receive an allocation of the Phase III credits, a qualifying advanced coal project must include equipment that separates and sequesters at least 70 percent of such project’s total carbon dioxide emissions.

Section 48A(d)(5) provides that the Secretary shall, upon making a certification under § 48A(d) or § 48B(d), publicly disclose the identity of the applicant and the amount of the credit certified with respect to such applicant. Section 10.01 of the Notice

further provides that the Service intends to publish the results of the Phase III allocation round, and disclose the following information in the event the Phase III credit is allocated to the taxpayer's project: (a) the name of the taxpayer and (b) the amount of the Phase III credit allocated to the project.

Accordingly, the results of the 2012-13 allocation round under the Phase III program are as follows:

Program	Taxpayer	Amount of Credit Awarded	Total Credit Awarded
Phase III			
	STCE Holdings, LLC	\$324,000,000	
	SCS Energy California, LLC	\$334,500,000	
			\$658,500,000

The 2012-2013 allocation round is the only allocation round under the Phase III program.

SECTION 2. DRAFTING INFORMATION

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