

The One Big Beautiful Bill’s (OBBB) Energy Tax Credit Timeline

For purposes of §§45, 45Y, 48 & 48E

Jul. 4, 2025	Sep. 2, 2025	Dec. 31, 2025	Jul. 4, 2026	Dec. 31, 2027	Dec. 31, 2028	Dec. 31, 2029	Dec. 31, 2030	Dec. 31, 2033	Dec. 31, 2035	Dec. 31, 2037	Dec. 31, 2039
Enactment date for OBBB.	Deadline for solar projects > 1.5 MW and wind projects to be able to “begin construction” under the 5% safe harbor per Notice 2025-42 .	Deadline for any project eligible for the tech neutral tax credits (i.e., §§45Y and 48E) to begin construction under the pre-Notice 2025-42 rules (i.e., all projects can use 5% safe harbor) for the specific purpose of avoiding the “material assistance” rules (i.e., limitations on the percentage of Chinese content in the project) that are part of the foreign entity of concern (FEOC) set of rules.	Deadline for wind and solar (regardless of size) projects to begin construction to avoid the Dec. 31, 2027 placed in service deadline. Solar projects > 1.5 MW and wind projects either (i) must have begun construction by Sep. 2, 2025, or (ii) not use the 5% safe harbor (i.e., use a “significant physical work” strategy).	Deadline for wind and solar (regardless of size) projects to be placed in service (unless began construction by Jul. 4, 2026). Also, the deadline for any project with a capacity > 1 MW that began construction by January 28, 2023 to avoid the “prevailing wage and apprentice” rules to be placed in service to meet the, generally applicable, four year continuity safe harbor.	Deadline for projects under legacy §§45 and 48 to be placed in service and meet the, generally applicable, four year “continuity safe harbor”.	Deadline for tech neutral projects under §§45Y and 48E to be placed in service to meet the, generally applicable, four year continuity safe harbor to have begun construction by Dec. 31, 2025 to avoid the material assistance rules (i.e., restrictions on the percentage of Chinese content in the project). Also the deadline, for any solar project over 1.5 MW or any wind project that began construction by Sep. 2, 2025 to be able to use the 5 % safe harbor to be placed in service to meet the, generally applicable, four year continuity safe harbor.	Deadline for wind and solar projects that began construction by Jul. 4, 2026 to meet the, generally applicable, four year continuity safe harbor.	Deadline for tech neutral projects (other than wind and solar) under §§ 45Y and 48E to begin construction to qualify for any tax credits.	Deadline for geothermal heat pumps to begin construction and qualify for § 48 investment tax credit under a rule specific to geothermal heat pumps.	Deadline for tech neutral projects (other than wind and solar) under §§45Y and 48E to be placed in service to meet the, generally applicable, four year continuity safe harbor for having begun construction in 2033.	Deadline for geothermal heat pumps to be placed in service to meet the, generally applicable, four year continuity safe harbor (assuming the project began construction in 2035).