Summary comment from Solar Shield LLC (Washington DC): IRS should alternatively define "single project" for purposes of the 40% "manufactured components" part of the IRA's 10% Domestic Content bonus provision as, for example, "any group of projects owned or developed by the same entity or affiliated entities for which construction is completed within four (4) months from commencement of the construction of the first project within such a group." This approach would provide necessary flexibility consistent with the statutory language and intent; consistent with EPA's long history authorizing cost-effective averaging across affected sources for clean-air or related compliance purposes (see, e.g. https://news.bloomberglaw.com/daily-tax-report/why-carbon-markets-will-work?context=search&index=3 ); and roughly analogous to approaches already proposed by affected parties under the IRA's manufacturing credit provision. Since the entire group's "costs upon completion" still must meet or exceed 40% for this component, we see no downside here.

The 4-month example time frame above contemplates rooftop PV facility installations. Longer time frames may be appropriate for other types of renewable-energy projects.

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