

INTERNAL REVENUE BULLETIN



HIGHLIGHTS OF THIS ISSUE

These synopses are intended only as aids to the reader in identifying the subject matter covered. They may not be relied upon as authoritative interpretations.

EXEMPT ORGANIZATIONS

Announcement 2025-17, page 1620.

The Internal Revenue Service has revoked its determination that Little Kings and Queens Inc. qualifies as an organization described in sections 501(c)(3) and 170(c)(2) of the Internal Revenue Code of 1986. The revocation is effective January 1, 2020

Announcement 2025-18, page 1621.

Revocation of IRC 501(c)(3) Organizations for failure to meet the code section requirements. Contributions made to the organizations by individual donors are no longer deductible under IRC 170(b)(1)(A).

TAX CONVENTIONS

Notice 2025-27, page 1611.

This notice provides interim guidance regarding the application of the corporate alternative minimum tax, as added to

Bulletin No. 2025-26
June 23, 2025

title 26 of the United States Code (Internal Revenue Code) by the Inflation Reduction Act of 2022. Specifically, this notice provides an optional simplified method for determining applicable corporation status under § 59(k) of the Internal Revenue Code. This notice also waives certain additions to tax under § 6655 with respect to a corporation's CAMT liability under § 55.

Notice 2025-30, page 1615.

This notice publishes the inflation adjustment factor and reference price for calendar year 2025 for the renewable electricity production credit under section 45 of the Internal Revenue Code. The 2025 inflation adjustment factor and reference price are used in determining the availability of the credit and apply to calendar year 2025 sales of kilowatt hours of electricity produced in the United States or a possession thereof from qualified energy resources. This notice also provides the credit amounts for calendar year 2025 under section 45.

The IRS Mission

Provide America's taxpayers top-quality service by helping them understand and meet their tax responsibilities and enforce the law with integrity and fairness to all.

Introduction

The Internal Revenue Bulletin is the authoritative instrument of the Commissioner of Internal Revenue for announcing official rulings and procedures of the Internal Revenue Service and for publishing Treasury Decisions, Executive Orders, Tax Conventions, legislation, court decisions, and other items of general interest. It is published weekly.

It is the policy of the Service to publish in the Bulletin all substantive rulings necessary to promote a uniform application of the tax laws, including all rulings that supersede, revoke, modify, or amend any of those previously published in the Bulletin. All published rulings apply retroactively unless otherwise indicated. Procedures relating solely to matters of internal management are not published; however, statements of internal practices and procedures that affect the rights and duties of taxpayers are published.

Revenue rulings represent the conclusions of the Service on the application of the law to the pivotal facts stated in the revenue ruling. In those based on positions taken in rulings to taxpayers or technical advice to Service field offices, identifying details and information of a confidential nature are deleted to prevent unwarranted invasions of privacy and to comply with statutory requirements.

Rulings and procedures reported in the Bulletin do not have the force and effect of Treasury Department Regulations, but they may be used as precedents. Unpublished rulings will not be relied on, used, or cited as precedents by Service personnel in the disposition of other cases. In applying published rulings and procedures, the effect of subsequent legislation, regulations, court decisions, rulings, and procedures must be considered, and Service personnel and others concerned are cautioned

against reaching the same conclusions in other cases unless the facts and circumstances are substantially the same.

The Bulletin is divided into four parts as follows:

Part I.—1986 Code.

This part includes rulings and decisions based on provisions of the Internal Revenue Code of 1986.

Part II.—Treaties and Tax Legislation.

This part is divided into two subparts as follows: Subpart A, Tax Conventions and Other Related Items, and Subpart B, Legislation and Related Committee Reports.

Part III.—Administrative, Procedural, and Miscellaneous.

To the extent practicable, pertinent cross references to these subjects are contained in the other Parts and Subparts. Also included in this part are Bank Secrecy Act Administrative Rulings. Bank Secrecy Act Administrative Rulings are issued by the Department of the Treasury's Office of the Assistant Secretary (Enforcement).

Part IV.—Items of General Interest.

This part includes notices of proposed rulemakings, disbarment and suspension lists, and announcements.

The last Bulletin for each month includes a cumulative index for the matters published during the preceding months. These monthly indexes are cumulated on a semiannual basis, and are published in the last Bulletin of each semiannual period.

The contents of this publication are not copyrighted and may be reprinted freely. A citation of the Internal Revenue Bulletin as the source would be appropriate.

Part III

Interim Simplified Method for Determining Applicable Corporation Status; Waiver of Certain Additions to Tax under Section 6655

Notice 2025-27

SECTION 1. OVERVIEW

This notice provides interim guidance regarding the application of the corporate alternative minimum tax (CAMT) and relief from certain additions to tax for an applicable corporation's underpayment of estimated tax under § 6655 of the Internal Revenue Code (Code).¹ Section 3 of this notice provides an optional simplified method for determining applicable corporation status (interim simplified method). Section 4 of this notice waives certain additions to tax under § 6655 with respect to a corporation's CAMT liability under § 55.

Prior to the publication of any final regulations relating to the CAMT, the Department of the Treasury (Treasury Department) and the Internal Revenue Service (IRS) intend to issue a notice of proposed rulemaking that revises the CAMT proposed regulations described in section 2.02(2) of this notice to include a method for determining applicable corporation status similar to the interim simplified method as well as other revisions.

SECTION 2. BACKGROUND

.01 *Overview of the CAMT.* Section 10101 of Public Law 117-169, 136 Stat. 1818, 1818-1828 (August 16, 2022), commonly referred to as the Inflation Reduction Act of 2022, amended § 55 to impose the CAMT based on the "adjusted financial statement income" (AFSI) of an "applicable corporation" for taxable years beginning after December 31, 2022. The definition of "applicable corporation" is

provided in § 59(k)(1) and described in section 2.03 of this notice. Section 55(a) provides that, for the taxable year of an applicable corporation, the amount of CAMT imposed by § 55 equals the excess (if any) of (i) the tentative minimum tax for the taxable year, over (ii) the sum of the regular tax, as defined in § 55(c), for the taxable year plus the tax imposed under § 59A. Section 55(b)(2)(A) provides that, in the case of an applicable corporation, the tentative minimum tax for the taxable year is the excess of (i) 15 percent of AFSI for the taxable year (as determined under § 56A), over (ii) the CAMT foreign tax credit for the taxable year (as determined under § 59(l)). In the case of any corporation that is not an applicable corporation, § 55(b)(2)(B) provides that the tentative minimum tax for the taxable year is zero.

.02 *Prior guidance relating to the CAMT.*

(1) *Prior notices.* Notice 2023-7, 2023-3 I.R.B. 390 (January 17, 2023), announced that the Treasury Department and the IRS intended to issue proposed regulations addressing the application of the CAMT. Notice 2023-7 provided interim guidance on certain issues relating to the CAMT, including the treatment of certain Federal income tax credits under the CAMT and a safe harbor method for determining whether a corporation is an applicable corporation subject to the CAMT. Notice 2023-20, 2023-10 I.R.B. 523 (March 6, 2023), Notice 2023-64, 2023-40 I.R.B. 974 (October 2, 2023), and Notice 2024-10, 2024-3 I.R.B. 406 (January 16, 2024), provided additional interim guidance to further clarify the application of the CAMT. Taxpayers may generally rely on the interim guidance provided in Notice 2023-7, Notice 2023-20, and Notice 2023-64 for taxable years ending on or before September 13, 2024. Taxpayers may rely on Notice 2024-10 for "Covered CFC Distributions" (as defined therein) received on or before September 13, 2024, and the rules for determining the applicable financial statement (AFS) of a tax con-

solidated group for taxable years ending before September 13, 2024.

(2) *CAMT Proposed Regulations.* On September 13, 2024, the Treasury Department and the IRS published a notice of proposed rulemaking (REG-112129-23) in the *Federal Register* (89 F.R. 75062) containing proposed regulations addressing the application of the CAMT (CAMT Proposed Regulations). Proposed § 1.59-2(g) of the CAMT Proposed Regulations would provide a simplified method for determining applicable corporation status. The CAMT Proposed Regulations also provide reliance rules, which are described in section 2.06 of this notice. On December 26, 2024, the Treasury Department and the IRS published in the *Federal Register* (89 F.R. 104909) technical corrections to the CAMT Proposed Regulations. Numerous comments were submitted in response to the CAMT Proposed Regulations, which the Treasury Department and the IRS continue to consider and study.

.03 *Definition of applicable corporation.*

(1) *Applicable corporation.* Section 59(k)(1)(A) provides that, for purposes of §§ 55 through 59, the term "applicable corporation" means, with respect to any taxable year, any corporation (other than an S corporation, a regulated investment company, or a real estate investment trust) that meets either of the two average annual AFSI tests provided in § 59(k)(1)(B), for one or more taxable years that (1) are prior to that taxable year and (2) end after December 31, 2021.

(2) *Average annual AFSI tests.* The "general AFSI test" of § 59(k)(1)(B)(i) (described in section 2.03(2)(a) of this notice) and the "FPMG AFSI test" of § 59(k)(1)(B)(ii) (described in section 2.03(2)(b) of this notice) are collectively referred to as "the average annual AFSI tests" in this notice.

(a) *General AFSI test.* Under the general AFSI test of § 59(k)(1)(B)(i), if a corporation is not a member of a foreign-parented multinational group (FPMG) (as

¹ Unless otherwise specified, all "section" or "§" references are to sections of the Code or the Income Tax Regulations (26 CFR part 1).

defined in § 59(k)(2)(B)) for any taxable year, the corporation meets the average annual AFSI test for a taxable year if its average annual AFSI (determined without regard to the adjustment under § 56A(d) for financial statement net operating losses (FSNOLs)) for the 3-taxable-year period ending with such taxable year exceeds \$1 billion.

(b) *FPMG AFSI test.* Under the FPMG AFSI test of § 59(k)(1)(B)(ii), if a corporation is a member of an FPMG for any taxable year, the corporation meets the average annual AFSI test if—

(i) the corporation meets the general AFSI test for the taxable year (determined after applying the FPMG rule in § 59(k)(2)), and

(ii) the average annual AFSI of the corporation (determined without regard to the FPMG rule in § 59(k)(2) and without regard to the adjustment under § 56(d) for FSNOLs) for the 3-taxable-year period ending with such taxable year is \$100 million or more.

(3) *Proposed § 1.59-2.* Proposed § 1.59-2 would provide rules under § 59(k) for determining whether a corporation is an applicable corporation for purposes of §§ 55 through 59. Proposed § 1.59-2(c) would provide general rules regarding the average annual AFSI tests under § 59(k)(1)(B) and for determining AFSI for purposes of these tests.

.04 *Definition of AFSI and adjustments relevant to interim simplified method.*

(1) *Definition of AFSI.* For purposes of §§ 55 through 59, the term “AFSI” means, with respect to any corporation for any taxable year, the net income or loss of the taxpayer set forth on the taxpayer’s AFS for that taxable year, adjusted as provided in § 56A. Section 56A(c) provides general adjustments to be made to AFSI. Section 56A(c)(15) authorizes the Secretary of the Treasury or the Secretary’s delegate (Secretary) to issue regulations or other guidance to provide for such adjustments to AFSI as the Secretary determines necessary to carry out the purposes of § 56A.

(2) *AFSI adjustments for certain Federal and foreign income taxes.* Section 56A(c)(5) provides the general rule that AFSI is appropriately adjusted to disregard any Federal income taxes, or income,

war profits, or excess profits taxes (within the meaning of § 901) with respect to a foreign country or possession of the United States, which are taken into account on the taxpayer’s AFS. Proposed § 1.56A-8(b) would provide general rules for adjusting AFSI for certain income taxes under § 56A(c)(5).

(3) *AFSI adjustments with respect to certain tax credits.* Section 56A(c)(9) requires AFSI to be appropriately adjusted to disregard any amount treated as a payment against the Federal income tax pursuant to an election under § 48D(d) or § 6417 and included in the net income or loss set forth on the taxpayer’s AFS. However, if such amount is otherwise disregarded under the adjustment rule in § 56A(c)(5), the adjustment in § 56A(c)(9) does not apply. Consistent with § 56A(c)(9), and pursuant to the authority granted by § 56A(c)(15) and (e), proposed § 1.56A-12 would provide that AFSI is adjusted to disregard any amount treated as a payment against the tax imposed by subtitle A of the Code pursuant to an election under § 48D(d) or § 6417 and any amount received from the transfer of an eligible credit that is not included in the gross income of the CAMT entity under § 6418(b) or that is treated as tax-exempt income under § 6418(c)(1)(A), to the extent the amount is not otherwise disregarded under proposed § 1.56A-8, among other AFSI adjustments.

(4) *AFSI adjustments for tax-exempt entities.* Section 56A(c)(12) requires AFSI to be appropriately adjusted, in the case of an organization subject to tax under § 511, to take into account only AFSI (i) of an unrelated trade or business of such organization, as defined in § 513, or (ii) derived from debt-financed property, as defined in § 514, to the extent that income from such property is treated as unrelated business taxable income. Proposed § 1.56A-14 would provide rules implementing § 56A(c)(12).

.05 *Simplified method for determining applicable corporation status.*

(1) Section 59(k)(3)(A) authorizes the Secretary to issue regulations or other guidance providing a simplified method for determining whether a corporation is an applicable corporation subject to the CAMT.

(2) Under that authority, proposed § 1.59-2(g) would provide a simplified method for determining applicable corporation status, which is generally consistent with section 5 of Notice 2023-7. Proposed § 1.59-2(g)(2) would provide that, under the simplified method, the average annual AFSI tests are applied with specified modifications. First, the simplified method thresholds used for the average annual AFSI tests in § 59(k)(1)(B) would be reduced from \$1 billion to \$500 million and from \$100 million to \$50 million, respectively. In addition, proposed § 1.59-2(g)(2)(iii)(B), as corrected, would provide that, in determining AFSI under the simplified method, the only adjustments made are those in proposed § 1.56A-8(b) (concerning taxes) and proposed § 1.56A-14 (concerning tax-exempt entities) and, solely for purposes of the \$100 million second prong of the FPMG AFSI test, proposed § 1.56A-7 (regarding adjustment for income effectively connected to a United States trade or business). Further, in determining the AFSI of a person whose financial results are reflected on a consolidated AFS, those members of a test group whose financial results are reflected on the consolidated AFS would be treated as a single CAMT entity for purposes of proposed § 1.56A-1(c)(3) and (4) so that consolidation entries would be taken into account, except for those consolidation entries that eliminate transactions between persons that are treated as neither a single employer under § 52(a) or (b) nor members of an FPMG. See proposed § 1.59-2(g)(2)(iii)(A). Finally, the simplified method would permit a corporation that has an AFS year that differs from its taxable year to determine its AFSI by using its AFS year. See proposed § 1.59-2(g)(2)(iv).

(3) Comments submitted in response to the simplified method provided under proposed § 1.59-2(g) have generally recommended raising the thresholds for the simplified method under proposed § 1.59-2(g) in order to reduce potential compliance burdens for corporations that exceed the thresholds but are not expected to be applicable corporations. The comments indicated that such corporations are currently required to determine applicable corporation status by applying the average

annual AFSI tests under § 59(k)(1)(B) or proposed § 1.59-2(c), and to comply with applicable reporting requirements, as they do not satisfy the simplified method in proposed § 1.59-2(g).

(4) In addition, comments submitted in response to the simplified method provided under proposed § 1.59-2(g) requested that the adjustments to AFSI for certain tax credits under proposed § 1.56A-12, which apply for purposes of calculating AFSI for determining applicable corporation status under proposed § 1.59-2(c), should also apply when calculating AFSI under the simplified method in proposed § 1.59-2(g) (2). The comments noted that the exclusion of the AFSI adjustments under proposed § 1.56A-12 from the calculation of AFSI under the simplified method in proposed § 1.59-2(g)(2) could cause certain corporations that are not expected to be applicable corporations to exceed the thresholds in the proposed simplified method and, accordingly, to bear increased compliance burdens and higher compliance costs to calculate AFSI under the average annual AFSI tests in § 59(k)(1)(B) or proposed § 1.59-2(c) and to comply with applicable reporting requirements.

.06 *Proposed applicability dates and reliance on the CAMT Proposed Regulations.* Proposed § 1.59-2 and other “specified regulations” (as defined in the Proposed Applicability Dates and Reliance on the Proposed Regulations section of the preamble to the CAMT Proposed Regulations) are proposed to apply to taxable years ending after September 13, 2024. In addition, the CAMT Proposed Regulations provide that a taxpayer may rely on proposed § 1.59-2 and other specified regulations for any taxable year ending on or before September 13, 2024, provided that the taxpayer, and each member of its test group determined under proposed § 1.59-2 for that taxable year, consistently follow all of the specified regulations (and other enumerated proposed rules) in their entirety for that taxable year and each subsequent taxable year until the first taxable year to which the final regulations are applicable. In addition, taxpayers may rely on one or more other sections of the CAMT Proposed Regulations for any taxable years ending on or before the date the CAMT

Proposed Regulations are published as final in the *Federal Register*, provided that the taxpayer and each member of its test group for the taxable year consistently follow that section in its entirety and also follow all of the specified regulations (and other enumerated proposed rules) in their entirety in that taxable year and each subsequent taxable year until the first taxable year that final regulations are applicable.

.07 *Estimated taxes.*

(1) Section 6655(a) imposes an addition to tax for failure by a corporation to make a sufficient and timely payment of estimated income tax. Section 6655(c) and (d)(1)(A) generally provide that, in the case of a corporation, estimated income tax is required to be paid in four installments and the amount of any required installment is 25 percent of the required annual payment. Generally, under § 6655(d)(1)(B), the required annual payment is the lesser of two amounts described in § 6655(d)(1)(B)(i) and (ii). The amount described in § 6655(d)(1)(B)(i) is 100 percent of the tax shown on the return for the taxable year. The amount described in § 6655(d)(1)(B)(ii) is 100 percent of the tax shown on the taxpayer’s return for the preceding taxable year, so long as the preceding taxable year was a full twelve months long and the return for such year showed a liability for tax. However, pursuant to § 6655(d)(2), in the case of a large corporation (as defined under § 6655(g)(2)), the amount described in § 6655(d)(1)(B)(ii) may not be used to reduce the amount of an installment payment other than the first installment payment for the taxable year. In special circumstances, other rules specified in § 6655 or elsewhere may also apply.

(2) On June 7, 2023, the Treasury Department and the IRS issued Notice 2023-42, 2023-26 I.R.B. 1085, which provided a waiver of the addition to tax under § 6655 with respect to a corporation’s CAMT liability under § 55 for any taxable year that begins after December 31, 2022, and before January 1, 2024.

(3) On April 15, 2024, the Treasury Department and the IRS issued Notice 2024-33, 2024-18 I.R.B. 959, which provided a limited waiver of the addition to

tax under § 6655 to the extent the amount of any underpayment is attributable to a portion of a corporation’s CAMT liability. The relief provided in Notice 2024-33 applied only for the purpose of calculating the installment of estimated tax by a corporate taxpayer that was due on or before April 15, 2024, or May 15, 2024 (in the case of a fiscal year taxpayer with a taxable year beginning in February 2024), with respect to a taxable year that began in 2024.

(4) On June 13, 2024, the Treasury Department and the IRS issued Notice 2024-47, 2024-27 I.R.B. 1, which extended the relief provided in Notice 2024-33. Under Notice 2024-47, the limited waiver of the addition to tax under § 6655 provided by Notice 2024-33 was extended to apply for the purpose of calculating any installment of estimated tax by a corporate taxpayer that was due on or before August 15, 2024, with respect to a taxable year that began in 2024.

(5) Finally, on September 12, 2024, the Treasury Department and the IRS issued Notice 2024-66, 2024-40 I.R.B. 682, which provided a waiver of the addition to tax under § 6655 with respect to a corporation’s CAMT liability under § 55 for any taxable year that begins after December 31, 2023, and before January 1, 2025. Notice 2024-66 also incorporated the relief provided in Notice 2024-33 and Notice 2024-47 and obsoleted those notices.

SECTION 3. INTERIM SIMPLIFIED METHOD

.01 *Purpose of the interim guidance.* To reduce compliance burdens and costs for certain corporations, this section 3 provides an interim simplified method to determine applicable corporation status using thresholds of \$800 million and \$80 million and calculating AFSI by using the AFSI adjustments described in proposed § 1.56A-12 as well as other AFSI adjustments.

.02 *Definition of AFS Consolidation Entries.* For purposes of this section 3, the term “AFS Consolidation Entries” means the financial accounting journal entries that are made in preparing a consolidated financial statement for a financial state-

ment group in order to present the financial results of that group as if all members of the group were a single economic entity, including journal entries:

(1) To eliminate the effect of transactions between members of the financial statement group;

(2) To report amounts that are not recorded in the separate books and records of one or more members of the financial statement group; and

(3) To correct or otherwise adjust amounts that are reported in the separate books and records of one or more members of the financial statement group.

.03 Interim simplified method for determining applicable corporation status.

(1) *Interim simplified method.* A corporation may apply the interim simplified method described in this section 3.03 for purposes of determining whether it is an applicable corporation under § 59(k)(1). Under the interim simplified method, a corporation determines whether it is an applicable corporation by applying the rules in § 59(k)(1) and (2) with the following modifications:

(a) The general AFSI test in § 59(k)(1)(B)(i) (including for purposes of § 59(k)(1)(B)(ii)(I)) is applied by substituting “\$800,000,000” for “\$1,000,000,000.”

(b) The second prong of the FPMG AFSI test in § 59(k)(1)(B)(ii)(II) is applied by substituting “\$80,000,000” for “\$100,000,000.”

(2) *Rules for determining AFSI.* For purposes of this section 3.03, AFSI is determined—

(a) Except as provided in section 3.03(2)(c) of this notice,

(i) with regard to the adjustments set forth in § 56A(c)(2)(A), (c)(2)(B), (c)(5), (c)(9), and (c)(12) and, solely for purposes of applying § 59(k)(1)(B)(ii)(II), the adjustment set forth in § 56A(c)(4), and

(ii) without regard to any other adjustments set forth in § 56A(c) and (d),

(b) By adjusting AFSI to disregard (to the extent not already disregarded under § 56A(c)(9)):

(i) Any amount received from the transfer of an eligible credit, as defined in § 6418(f)(1)(A), that is not includible in the gross income of the taxpayer by application of § 6418(b) or is treated as tax exempt under § 6418(c)(1)(A), provided that such

amount (or portion thereof) is not otherwise disregarded under § 56A(c)(5),

(ii) Any amount received pursuant to an election under §§ 48D(d)(2) or 6417(c) that is treated as tax exempt income under § 48D(d)(2)(A)(i)(III) or 6417(c)(1)(C), provided that such amount is not otherwise disregarded under § 56A(c)(5),

(iii) Any amount paid by the transferee taxpayer, as defined in § 6418(a), to the eligible taxpayer, as defined in § 6418(f)(2), as consideration for the transfer of the eligible tax credit, as defined in § 6418(f)(1)(A), provided that the amount is not otherwise disregarded under § 56A(c)(5), and

(iv) Any increase in the transferee taxpayer’s net income or loss set forth on the taxpayer’s AFS resulting from the utilization of the eligible tax credit, provided that the increase is not otherwise disregarded under § 56A(c)(5), and

(c) After taking into account AFS Consolidation Entries, except those that eliminate transactions between persons not treated as a single employer under § 52(a) or between entities not included in an FPMG, as applicable.

(3) *AFS year different than taxable year.* For purposes of this section 3.03, if a corporation has an AFS that covers a period (AFS year) that differs from its taxable year—

(a) Section 59(k)(1)(B)(i) and (ii)(II) are applied by substituting “3-AFS-year period ending during such taxable year” for “3-taxable-year-period ending with such taxable year” in each place those phrases appear, and

(b) Section 59(k)(1)(E) is applied by substituting “AFS year” for “taxable year” and “3-AFS years” for “3-taxable years” in each place those phrases appear.

.04 Effect of exceeding the thresholds under the interim simplified method. If a corporation applies the interim simplified method described in section 3.03 of this notice for a taxable year and determines that its AFSI (as determined under section 3.03 of this notice) exceeds the relevant interim simplified method thresholds, then the corporation will be an applicable corporation for such taxable year only if it is determined to be an applicable corporation under § 59(k)(1) or, if the corporation follows the CAMT Proposed Regulations, proposed § 1.59-2(c).

.05 Applicability dates and reliance.

A corporation may use the interim simplified method provided in section 3.03 of this notice for determining applicable corporation status for any taxable year ending on or before the date that a Treasury Decision adopting a simplified method pursuant to § 59(k)(3)(A) is published in the *Federal Register* and for which the original Federal income tax return has not been filed as of June 23, 2025. A corporation’s use of the interim simplified method to determine that it is not an applicable corporation for a taxable year will not cause the corporation to become subject to, or to violate, the reliance rules, including the consistency requirements, provided in the preamble of the CAMT Proposed Regulations for such taxable year.

.06 Instructions to be modified. The instructions to Form 4626, *Alternative Minimum Tax – Corporations* and Schedule K of Form 1120, *U.S. Corporation Income Tax Return* (or other appropriate instructions in the Form 1120 series), will be modified, as necessary, to reflect the availability of the interim simplified method provided in section 3.03 of this notice. The modified instructions will be posted on <https://www.irs.gov>.

SECTION 4. LIMITED WAIVER OF ADDITION TO TAX

.01 Waiver. In light of the continued uncertainty with respect to tax positions determined by applicable corporations following the publication of the CAMT Proposed Regulations, and in the interest of sound tax administration, the IRS will waive the addition to tax under § 6655 with respect to a corporation’s CAMT liability under § 55 for any taxable year that begins after December 31, 2024, and before January 1, 2026 (Covered CAMT Year). Accordingly, for a Covered CAMT Year, a corporation’s required installments of estimated tax need not include amounts attributable to its CAMT liability under § 55 to prevent the imposition of an addition to tax under § 6655. If a corporation fails to timely pay its CAMT liability under § 55 when due, other sections of the Code may apply; for example, additions to tax could be imposed

under § 6651 if payment of the CAMT liability is not made by the due date (without regard to any extension) of the corporation's return.

.02 *Instructions to be modified.* The instructions to Form 2220, *Underpayment of Estimated Tax by Corporations*, will be modified, as necessary, to clarify that no addition to tax will be imposed under § 6655 based on a corporation's failure to make an estimated tax payment of its CAMT liability under § 55 for any Covered CAMT Year, and that a taxpayer may exclude such amounts when calculating the amount of its required annual payment on Form 2220. The modified instructions will be posted on <https://www.irs.gov>.

.03 *Instructions to avoid penalty notice.* Taxpayers seeking the relief provided in this notice (affected taxpayers) must file Form 2220 with their Federal income tax return, even if they owe no estimated tax penalty. The Form 2220 must be completed without including the CAMT liability from Schedule J of Form 1120, *U.S. Corporation Income Tax Return* (or other appropriate line of the corporation's income tax return in the Form 1120 series). Affected taxpayers must also include an amount of estimated tax penalty on Line 34 of their Form 1120 (or other appropriate line of the corporation's income tax return in the Form 1120 series), even if that amount is zero. Failure to follow these instructions could result in affected taxpayers receiving a penalty notice that will require an abatement request to apply the relief provided by this notice.

.04 *Applicability.* The waiver of the addition to tax imposed by § 6655 described in section 4.01 of this notice applies for any Covered CAMT Year.

SECTION 5. ADDITIONAL INTERIM GUIDANCE AND REGULATIONS

.01 The Treasury Department and the IRS intend to issue additional interim guidance regarding application of the CAMT to respond to other comments submitted in response to the CAMT Proposed

Regulations. The Treasury Department and the IRS anticipate that the additional interim guidance will address several issues, including among others:

(1) the interaction of the CAMT and the tonnage tax regime enacted by the American Jobs Creation Act of 2004, Public Law 108-357, 118 Stat. 1418 (October 22, 2004),

(2) how unrealized gains and losses on certain investment assets reported for financial statement purposes are taken into account for purposes of determining AFSI,

(3) alternative rules for determining a partner's distributive share of partnership AFSI,

(4) AFSI adjustments resulting from certain transactions between a partner and partnership,

(5) AFSI adjustments resulting from certain corporate transactions, and

(6) alternative rules for early reliance on the CAMT Proposed Regulations.

.02 The Treasury Department and the IRS anticipate that new proposed regulations issued to revise the CAMT Proposed Regulations will incorporate rules similar to the interim simplified method described in section 3 of this notice, the additional interim guidance addressing the issues described in section 5.01(1) through (6) of this notice, and other issues described in interim guidance.

SECTION 6. DRAFTING AND CONTACT INFORMATION

The principal authors of this notice are Madeline Padner of the Office of the Associate Chief Counsel (Income Tax and Accounting) and Alexander Wu of the Office of the Associate Chief Counsel (Procedure and Administration). Other personnel from the Treasury Department and the IRS participated in its development. For further information regarding section 3 of this notice, please contact Madeline Padner at (202) 317-7006 (not a toll-free number). For further information regarding section 4 of this notice, please contact Alexander Wu at (202) 317-6845 (not a toll-free number).

Credit for Renewable Electricity Production and Publication of Inflation Adjustment Factor and Reference Price for Calendar Year 2025

Notice 2025-30

This notice publishes the inflation adjustment factor and reference price for calendar year 2025 for the renewable electricity production credit under section 45 of the Internal Revenue Code (section 45 credit). The 2025 inflation adjustment factor and reference price are used in determining the availability of the credit and apply to calendar year 2025 sales of kilowatt hours of electricity produced in the United States or a possession thereof from qualified energy resources.

BACKGROUND

Section 45 was amended by section 13101 of Public Law 117-169, 136 Stat. 1818 (August 16, 2022), commonly known as the Inflation Reduction Act of 2022 (IRA). The IRA changed the manner in which the section 45 credit amounts are calculated for any qualified facility placed in service after December 31, 2021.

As amended by the IRA, section 45(b)(6)(A) provides that, in the case of any qualified facility that satisfies the requirements of section 45(b)(6)(B), the credit amount determined under section 45(a) (determined after the application of section 45(b)(1) through (5) and without regard to section 45(b)(6)) is equal to such amount multiplied by 5. A qualified facility satisfies the requirements of section 45(b)(6)(B) if it is placed in service after December 31, 2021, and it is one of the following: (i) a facility with a maximum net output of less than 1 megawatt (as measured in alternating current); (ii) a facility the construction of which began prior to January 29, 2023, which is the date that is 60 days after the publication of the guidance with respect to the require-

ments of section 45(b)(7)(A) (prevailing wage requirements) and section 45(b)(8) (apprenticeship requirements);¹ or (iii) a facility that satisfies the requirements of section 45(b)(7)(A) and (8). The IRA also added bonus credit amounts with respect to qualified facilities placed in service after December 31, 2022, that meet domestic content requirements under section 45(b)(9)² or energy community requirements under section 45(b)(11).³

The IRA amended the phaseout of the section 45 credit for wind facilities under section 45(b)(5) such that it does not apply to facilities placed in service after December 31, 2021. The IRA also added a new phaseout of the section 45 credit under section 45(b)(10) in the case of qualified facilities placed in service after December 31, 2022, for taxpayers making an elective payment election under section 6417. The IRA also amended the credit amount reduction under section 45(b)(3) in the case of qualified facilities the construction of which began after August 16, 2022.

The IRA amended section 45(d)(4) to restore the section 45 credit for electricity produced in solar energy facilities in the case of qualified facilities placed in service after December 31, 2021, and the construction of which began before January 1, 2025. Effective for facilities placed in service after December 31, 2022, the IRA (1) removed the one-half reduction of the credit amount under section 45(b)(4)(A) for qualified hydropower facilities and marine and hydrokinetic renewable energy facilities and (2) amended the definition of marine and hydrokinetic renewable energy under section 45(c)(10) and the definition of a marine and hydrokinetic renewable energy facility under section 45(d)(11). The IRA also extended certain deadlines in the definitions under section 45(d) for wind facilities, closed-loop biomass facilities, open-loop biomass facilities, geothermal facilities, landfill gas facilities, trash facilities, qualified hydropower facilities, and marine and hydrokinetic renewable energy facilities.

Section 45(a) provides that the renewable electricity production credit for any

tax year is an amount equal to the product of the kilowatt hours of specified electricity produced by the taxpayer and sold to an unrelated person during the tax year multiplied by 1.5 cents (in the case of a qualified facility placed in service before January 1, 2022) or 0.3 cents (in the case of a qualified facility placed in service after December 31, 2021). This electricity must be produced from qualified energy resources and at a qualified facility during the 10-year period beginning on the date the facility was originally placed in service.

Section 45(b)(1) provides that the amount of the credit determined under section 45(a) is reduced by an amount which bears the same ratio to the amount of the credit as the amount by which the reference price for the calendar year in which the sale occurs exceeds 8 cents, bears to 3 cents. Under section 45(b)(2), the 1.5 cent (or 0.3 cent) amount in section 45(a) and the 8 cent amount in section 45(b)(1) are each adjusted by multiplying such amount by the inflation adjustment factor for the calendar year in which the sale occurs. In the case of any qualified facility placed in service before January 1, 2022, if any amount as increased under section 45(b)(2) is not a multiple of 0.1 cent, such amount is rounded to the nearest multiple of 0.1 cent. In the case of any qualified facility placed in service after December 31, 2021, if the 0.3 cent amount as increased under section 45(b)(2) is not a multiple of 0.05 cent, such amount is rounded to the nearest multiple of 0.05 cent.

In the case of electricity produced in open-loop biomass facilities, landfill gas facilities, trash facilities, qualified hydropower facilities, and, if placed in service before January 1, 2023, marine and hydrokinetic renewable energy facilities, section 45(b)(4)(A) requires the amount in effect under section 45(a)(1) for such calendar year (determined before rounding as required by section 45(b)(2)) to be reduced by one-half. As amended by the IRA, the one-half reduction under section 45(b)(4)(A) no longer applies to qualified hydro-

power facilities and marine and hydrokinetic renewable energy facilities placed in service after December 31, 2022.

Section 45(b)(5) provides that in the case of any qualified wind facility placed in service before January 1, 2022, the amount of the credit determined under section 45(a) (determined after the application of section 45(b)(1), (2), and (3) and without regard to section 45(b)(5)) shall be reduced by (A) in the case of any facility the construction of which began after December 31, 2016, and before January 1, 2018, 20 percent, (B) in the case of any facility the construction of which began after December 31, 2017, and before January 1, 2019, 40 percent, (C) in the case of any facility the construction of which began after December 31, 2018, and before January 1, 2020, 60 percent, and (D) in the case of any facility the construction of which began after December 31, 2019, and before January 1, 2022, 40 percent.

Section 45(c)(1) defines qualified energy resources as wind, closed-loop biomass, open-loop biomass, geothermal energy, solar energy, municipal solid waste, qualified hydropower production, and marine and hydrokinetic renewable energy.

Section 45(d)(1) defines a qualified facility using wind to produce electricity as any facility owned by the taxpayer that was originally placed in service after December 31, 1993, and the construction of which began before January 1, 2025. *See* section 45(e)(7) for rules relating to the inapplicability of the credit to electricity sold to utilities under certain contracts.

Section 45(d)(2)(A) defines a qualified facility using closed-loop biomass to produce electricity as any facility owned by the taxpayer that was originally placed in service after December 31, 1992, and the construction of which began before January 1, 2025, or owned by the taxpayer which before January 1, 2025, was originally placed in service and modified to use closed-loop biomass to co-fire with coal, with other biomass, or with both, but only if the modification is approved under the

¹ See §§ 1.45-6, 1.45-7, 1.45-8, and 1.45-12 of the Income Tax Regulations for additional information regarding the requirements of section 45(b)(6)(B).

² See Notice 2023-38, 2023-22 I.R.B. 872 (May 12, 2023), Notice 2024-41, 2024-24 I.R.B. 1615 (May 16, 2024), corrected at IR 2024-147 (May 24, 2024), and Notice 2025-08, 2025-8 I.R.B. 800 (February 18, 2025), for additional information regarding the domestic content bonus credit.

³ See Notice 2024-30, 2024-16 I.R.B. 878 (April 15, 2024), for additional information regarding the energy community bonus credit.

Biomass Power for Rural Development Programs or is part of a pilot project of the Commodity Credit Corporation as described in 65 FR 63052. For purposes of section 45(d)(2)(A)(ii), a facility shall be treated as modified before January 1, 2025, if the construction of such modification began before such date. Section 45(d)(2)(C) provides that in the case of a qualified facility described in section 45(d)(2)(A)(ii), the 10-year period referred to in section 45(a) is treated as beginning no earlier than the date of the enactment of section 45(d)(2)(C)(i) (October 22, 2004), and if the owner of such facility is not the producer of the electricity, the person eligible for the credit allowable under section 45(a) is the lessee or the operator of such facility. A qualified facility using closed-loop biomass includes a new unit placed in service after the date of the enactment of section 45(d)(2)(B) (October 3, 2008) in connection with a qualified facility using closed-loop biomass, but only to the extent of the increased amount of electricity produced at the facility by reason of such new unit.

Section 45(d)(3)(A) defines a qualified facility using open-loop biomass to produce electricity as any facility owned by the taxpayer which in the case of a facility using agricultural livestock waste nutrients, was originally placed in service after the date of the enactment of section 45(d)(3)(A)(i)(I) (October 22, 2004) and the construction of which began before January 1, 2025, and the nameplate capacity rating of which is not less than 150 kilowatts, and in the case of any other facility, the construction of which began before January 1, 2025. In the case of any facility described in section 45(d)(3)(A), if the owner of such facility is not the producer of the electricity, section 45(d)(3)(C) provides that the person eligible for the credit allowable under section 45(a) is the lessee or the operator of such facility. A qualified facility using open-loop biomass includes a new unit placed in service after the date of the enactment of section 45(d)(3)(B) (October 3, 2008) in connection with a qualified facility using open-loop biomass, but only to the extent of the increased amount of electricity produced at the facility by reason of such new unit.

Section 45(d)(4) defines a qualified facility using geothermal energy to pro-

duce electricity as any facility owned by the taxpayer that was originally placed in service after the date of the enactment of section 45(d)(4) (October 22, 2004) and the construction of which began before January 1, 2025. A qualified facility using geothermal energy does not include any property described in section 48(a)(3) the basis of which is taken into account by the taxpayer for purposes of determining the energy credit under section 48.

As amended by the IRA and effective for solar energy facilities placed in service after December 31, 2021, section 45(d)(4) also defines a qualified facility using solar energy to produce electricity as any facility owned by the taxpayer that was originally placed in service after the date of the enactment of section 45(d)(4) (October 22, 2004) and the construction of which began before January 1, 2025. A qualified facility using solar energy does not include any property described in section 48(a)(3) the basis of which is taken into account by the taxpayer for purposes of determining the energy credit under section 48.

Section 45(d)(6) defines a qualified facility using gas derived from the biodegradation of municipal solid waste to produce electricity as any facility owned by the taxpayer that was originally placed in service after the date of the enactment of section 45(d)(6) (October 22, 2004) and the construction of which began before January 1, 2025.

Section 45(d)(7) defines a qualified facility (other than a facility described in section 45(d)(6)) that uses municipal solid waste to produce electricity as any facility owned by the taxpayer that was originally placed in service after the date of the enactment of section 45(d)(7) (October 22, 2004) and the construction of which began before January 1, 2025. A qualified facility using municipal solid waste includes a new unit placed in service in connection with a facility placed in service on or before the date of the enactment of section 45(d)(7), but only to the extent of the increased amount of electricity produced at the facility by reason of such new unit.

Section 45(d)(9) defines a qualified facility producing qualified hydroelectric production (as described in section 45(c)(8)) as (i) any facility producing incremental hydropower production, but only to the

extent of its incremental hydropower production attributable to efficiency improvements or additions to capacity described in section 45(c)(8)(B) placed in service after the date of the enactment of section 45(d)(9) (August 8, 2005) and before January 1, 2025, and (ii) any other facility placed in service after the date of the enactment of section 45(d)(9) (August 8, 2005) and the construction of which began before January 1, 2025. Section 45(d)(9)(B) provides that, in the case of a qualified facility described in section 45(d)(9)(A), the 10-year period referred to in section 45(a) shall be treated as beginning on the date the efficiency improvements or additions to capacity are placed in service. Section 45(d)(9)(C) provides that for purposes of section 45(d)(9)(A)(i), an efficiency improvement or addition to capacity shall be treated as placed in service before January 1, 2025, if the construction of such improvement or addition began before such date.

As amended by the IRA, section 45(d)(11) provides that, in the case of a facility producing electricity from marine and hydrokinetic renewable energy, the term “qualified facility” means any facility owned by the taxpayer which has a nameplate capacity rating of at least 150 kilowatts (or at least 25 kilowatts in the case of a facility placed in service after December 31, 2022), and was originally placed in service on or after the date of the enactment of section 45(d)(11) (October 3, 2008) and the construction of which began before January 1, 2025.

Section 45(e)(2)(A) requires the Secretary to determine and publish in the Federal Register each calendar year the inflation adjustment factor and the reference price for such calendar year. The inflation adjustment factor and the reference price for the 2025 calendar year were published in the Federal Register at 90 FR 22438 on May 27, 2025.

Section 45(e)(2)(B) defines the inflation adjustment factor for a calendar year as a fraction the numerator of which is the GDP implicit price deflator for the preceding calendar year and the denominator of which is the GDP implicit price deflator for the calendar year 1992. The term “GDP implicit price deflator” means the most recent revision of the implicit price deflator for the gross domestic product as

computed and published by the Department of Commerce before March 15 of the calendar year.

Section 45(e)(2)(C) provides that the reference price with respect to a calendar year is the Secretary's determination of the annual average contract price per kilowatt hour of electricity generated from the same qualified energy resource and sold in the previous year in the United States. Only contracts entered into after December 31, 1989, are taken into account.

INFLATION ADJUSTMENT FACTOR AND REFERENCE PRICE

The inflation adjustment factor for calendar year 2025 for qualified energy resources is 1.9971.

The reference price for calendar year 2025 for facilities producing electricity from wind (based upon information provided by the Department of Energy) is 3.1 cents per kilowatt hour. The reference prices for facilities producing electricity from closed-loop biomass, open-loop biomass, geothermal energy, solar energy, municipal solid waste, qualified hydropower production, and marine and hydrokinetic renewable energy have not been determined for calendar year 2025.

PHASEOUT CALCULATION

Because the 2025 reference price for electricity produced from wind (3.1 cents per kilowatt hour) does not exceed 8 cents multiplied by the inflation adjustment factor (1.9971), the phaseout of the credit provided in section 45(b)(1) does not apply to such electricity sold during calendar year 2025. However, section 45(b)(5) provides an additional phaseout of the credit for wind facilities placed in service before January 1, 2022, and the construction of which began after December 31, 2016. For electricity produced from closed-loop biomass, open-loop biomass, geothermal energy, solar energy, municipal solid waste, qualified hydropower production, and marine

and hydrokinetic renewable energy, the phaseout of the credit provided in section 45(b)(1) does not apply to such electricity sold during calendar year 2025.

CREDIT AMOUNT FOR A QUALIFIED FACILITY PLACED IN SERVICE BEFORE JANUARY 1, 2022

As required by section 45(b)(2), the 1.5 cent amount provided in section 45(a)(1) is adjusted by multiplying such amount by the inflation adjustment factor for the calendar year in which the sale occurs. If any amount as increased under section 45(b)(2) is not a multiple of 0.1 cent, such amount is rounded to the nearest multiple of 0.1 cent. In the case of electricity produced in open-loop biomass facilities, landfill gas facilities, trash facilities, qualified hydropower facilities, and marine and hydrokinetic renewable energy facilities, section 45(b)(4)(A) requires the amount in effect under section 45(a)(1) for such calendar year (before rounding to the nearest 0.1 cent as required by section 45(b)(2)) to be reduced by one-half.⁴

Under the calculation required by section 45(b)(2), the credit for renewable electricity production for calendar year 2025 determined under section 45(a) is 3 cents per kilowatt hour on the sale of electricity produced in any qualified facility placed in service before January 1, 2022, from the qualified energy resources of wind, closed-loop biomass, and geothermal energy, and 1.5 cents per kilowatt hour on the sale of electricity produced in any qualified facility placed in service before January 1, 2022, from the qualified energy resources of open-loop biomass, landfill gas, trash, qualified hydropower, and marine and hydrokinetic renewable energy.

CREDIT AMOUNT FOR A QUALIFIED FACILITY PLACED IN SERVICE AFTER DECEMBER 31, 2021

As required by section 45(b)(2), the 0.3 cent amount provided in section 45(a)(1)

is adjusted by multiplying such amount by the inflation adjustment factor for the calendar year in which the sale occurs. If the 0.3 cent amount as adjusted for inflation is not a multiple of 0.05 cent, the amount is rounded to the nearest multiple of 0.05 cent. In the case of electricity produced in open-loop biomass facilities, landfill gas facilities, trash facilities, qualified hydropower facilities, and marine and hydrokinetic renewable energy facilities, section 45(b)(4)(A) requires the amount in effect under section 45(a)(1) for such calendar year (determined before rounding as required by section 45(b)(2)) to be reduced by one-half.

Under the calculation required by section 45(b)(2), the credit for renewable electricity production for calendar year 2025 determined under section 45(a) is 0.6 cents per kilowatt hour on the sale of electricity produced in any qualified facility placed in service after December 31, 2021, from the qualified energy resources of wind, closed-loop biomass, geothermal energy, and solar energy, and 0.3 cents per kilowatt hour on the sale of electricity produced in any qualified facility placed in service after December 31, 2021, from the qualified energy resources of open-loop biomass, landfill gas and trash. The credit for renewable electricity production for calendar year 2025 determined under section 45(a) is also 0.3 cents per kilowatt hour on the sale of electricity produced in any qualified facility placed in service after December 31, 2021, and before January 1, 2023, from the qualified energy resources of qualified hydropower and marine and hydrokinetic renewable energy.

CREDIT AMOUNT FOR QUALIFIED HYDROPOWER FACILITIES AND MARINE AND HYDROKINETIC RENEWABLE ENERGY FACILITIES PLACED IN SERVICE AFTER DECEMBER 31, 2022

The one-half reduction under section 45(b)(4)(A) no longer applies to quali-

⁴As amended by the IRA and discussed later in this notice, the one-half reduction under section 45(b)(4)(A) no longer applies to qualified hydropower facilities and marine and hydrokinetic renewable energy facilities placed in service after December 31, 2022.

fied hydropower facilities and marine and hydrokinetic renewable energy facilities placed in service after December 31, 2022. Accordingly, under the calculation required by section 45(b)(2), the credit for renewable electricity production for calendar year 2025 determined under section 45(a) is 0.6

cents per kilowatt hour on the sale of electricity produced in any qualified facility placed in service after December 31, 2022, from the qualified energy resources of qualified hydropower and marine and hydrokinetic renewable energy.

DRAFTING AND CONTACT INFORMATION

The principal author of this notice is Charles Hyde of the Office of Associate Chief Counsel (Energy, Credits, and Excise Tax). For further information regarding this notice contact Mr. Hyde at (202) 317-6853 (not a toll-free number).

Part IV

Deletions From Cumulative List of Organizations, Contributions to Which are Deductible Under Section 170 of the Code

Announcement 2025-17

The Internal Revenue Service has revoked its determination that the organization listed below qualifies as an organization described in sections 501(c)(3) and 170(c)(2) of the Internal Revenue Code of 1986.

Generally, the IRS will not disallow deductions for contributions made to a listed organization on or before the date of announcement in the Internal Revenue Bulletin that an organization no longer qualifies. However, the IRS is not precluded from disallowing a deduction for any contributions made after an organization ceases to qualify under section 170(c)(2) if the organization has not timely filed a suit for declaratory judgment under section 7428 and if the contributor (1) had knowledge of the revocation of the ruling or determination letter, (2) was aware that such revocation was imminent, or (3) was in part responsible for or was aware of the activities or omissions of the organization that brought about this revocation.

If on the other hand a suit for declaratory judgment has been timely filed, contributions from individuals and organizations described in section 170(c)(2) that are otherwise allowable will continue to be deductible. Protection under section 7428(c) would begin on January 1, 2018 and would end on the date the court first determines the organization is not described in section 170(c)(2) as more particularly set for in section 7428(c)(1). For individual contributors, the maximum deduction protected is \$1,000, with a husband and wife treated as one contributor. This benefit is not extended to any individual, in whole or in part, for the acts or omissions of the organization that were the basis for revocation.

The Following organization is no longer qualified as an organization exempt from income tax under Internal Revenue Code (the “Code”) Section 501(a) as an organization described in Section 501(c)(3) of the Code:

NAME OF ORGANIZATION	EFFECTIVE DATE OF REVOCATION	LOCATION
LITTLE KINGS AND QUEENS INC.	1/1/2020	BUFORD GA

Deletions From Cumulative List of Organizations, Contributions to Which are Deductible Under Section 170 of the Code

Announcement 2025-18

The Internal Revenue Service has revoked its determination that the organizations listed below qualify as organizations described in sections 501(c)(3) and 170(c)(2) of the Internal Revenue Code of 1986.

Generally, the IRS will not disallow deductions for contributions made to a listed organization on or before the date of announcement in the Internal Revenue Bulletin that an organization no longer qualifies. However, the IRS is not precluded from disallowing a deduction for any contributions made after an organization ceases to qualify under section 170(c)(2) if the organization has not timely filed a suit for declaratory judgment under section 7428 and if the contributor (1) had knowledge of the revocation of the ruling or determination letter, (2) was aware that such revocation was imminent, or (3) was in part responsible for or was aware of the activities or omissions of the organization that brought about this revocation.

If on the other hand a suit for declaratory judgment has been timely filed, contributions from individuals and organizations described in section 170(c)(2) that are otherwise allowable will continue to be deductible. Protection under section 7428(c) would begin on June 6, 2025, and would end on the date the court first determines the organization is not described in section 170(c)(2) as more particularly set for in section 7428(c)(1). For individual contributors, the maximum deduction protected is \$1,000, with a husband and wife treated as one contributor. This benefit is not extended to any individual, in whole or in part, for the acts or omissions of the organization that were the basis for revocation.

Name Of Organization	Effective Date of Revocation	Location
Global Rescue Welfare League, Inc.	07/01/2021	Columbia, SC
Global Rescue Welfare League, Inc.	07/01/2021	Williston, SC
Providing Hope VA	01/01/2020	Loris, SC
Houston Serenity Place Inc.	01/01/2020	Spring, TX
Preserve Reasonable Shoreline	07/01/2021	Bainbridge Island, WA

Definition of Terms

Revenue rulings and revenue procedures (hereinafter referred to as "rulings") that have an effect on previous rulings use the following defined terms to describe the effect:

Amplified describes a situation where no change is being made in a prior published position, but the prior position is being extended to apply to a variation of the fact situation set forth therein. Thus, if an earlier ruling held that a principle applied to A, and the new ruling holds that the same principle also applies to B, the earlier ruling is amplified. (Compare with *modified*, below).

Clarified is used in those instances where the language in a prior ruling is being made clear because the language has caused, or may cause, some confusion. It is not used where a position in a prior ruling is being changed.

Distinguished describes a situation where a ruling mentions a previously published ruling and points out an essential difference between them.

Modified is used where the substance of a previously published position is being changed. Thus, if a prior ruling held that a principle applied to A but not to B, and the

new ruling holds that it applies to both A and B, the prior ruling is modified because it corrects a published position. (Compare with *amplified* and *clarified*, above).

Obsoleted describes a previously published ruling that is not considered determinative with respect to future transactions. This term is most commonly used in a ruling that lists previously published rulings that are obsoleted because of changes in laws or regulations. A ruling may also be obsoleted because the substance has been included in regulations subsequently adopted.

Revoked describes situations where the position in the previously published ruling is not correct and the correct position is being stated in a new ruling.

Superseded describes a situation where the new ruling does nothing more than restate the substance and situation of a previously published ruling (or rulings). Thus, the term is used to republish under the 1986 Code and regulations the same position published under the 1939 Code and regulations. The term is also used when it is desired to republish in a single ruling a series of situations, names, etc., that were previously published over a period of time in separate rulings. If the

new ruling does more than restate the substance of a prior ruling, a combination of terms is used. For example, *modified* and *superseded* describes a situation where the substance of a previously published ruling is being changed in part and is continued without change in part and it is desired to restate the valid portion of the previously published ruling in a new ruling that is self contained. In this case, the previously published ruling is first modified and then, as modified, is superseded.

Supplemented is used in situations in which a list, such as a list of the names of countries, is published in a ruling and that list is expanded by adding further names in subsequent rulings. After the original ruling has been supplemented several times, a new ruling may be published that includes the list in the original ruling and the additions, and supersedes all prior rulings in the series.

Suspended is used in rare situations to show that the previous published rulings will not be applied pending some future action such as the issuance of new or amended regulations, the outcome of cases in litigation, or the outcome of a Service study.

Abbreviations

The following abbreviations in current use and formerly used will appear in material published in the Bulletin.

A—Individual.
Acq.—Acquiescence.
B—Individual.
BE—Beneficiary.
BK—Bank.
B.T.A.—Board of Tax Appeals.
C—Individual.
C.B.—Cumulative Bulletin.
CFR—Code of Federal Regulations.
CI—City.
COOP—Cooperative.
Ct.D.—Court Decision.
CY—County.
D—Decedent.
DC—Dummy Corporation.
DE—Donee.
Del. Order—Delegation Order.
DISC—Domestic International Sales Corporation.
DR—Donor.
E—Estate.
EE—Employee.
E.O.—Executive Order.

ER—Employer.
ERISA—Employee Retirement Income Security Act.
EX—Executor.
F—Fiduciary.
FC—Foreign Country.
FICA—Federal Insurance Contributions Act.
FISC—Foreign International Sales Company.
FPH—Foreign Personal Holding Company.
F.R.—Federal Register.
FUTA—Federal Unemployment Tax Act.
FX—Foreign corporation.
G.C.M.—Chief Counsel's Memorandum.
GE—Grantee.
GP—General Partner.
GR—Grantor.
IC—Insurance Company.
I.R.B.—Internal Revenue Bulletin.
LE—Lessee.
LP—Limited Partner.
LR—Lessor.
M—Minor.
Nonacq.—Nonacquiescence.
O—Organization.
P—Parent Corporation.
PHC—Personal Holding Company.
PO—Possession of the U.S.
PR—Partner.

PRS—Partnership.
PTE—Prohibited Transaction Exemption.
Pub. L.—Public Law.
REIT—Real Estate Investment Trust.
Rev. Proc.—Revenue Procedure.
Rev. Rul.—Revenue Ruling.
S—Subsidiary.
S.P.R.—Statement of Procedural Rules.
Stat.—Statutes at Large.
T—Target Corporation.
T.C.—Tax Court.
T.D.—Treasury Decision.
TFE—Transferee.
TFR—Transferor.
T.I.R.—Technical Information Release.
TP—Taxpayer.
TR—Trust.
TT—Trustee.
U.S.C.—United States Code.
X—Corporation.
Y—Corporation.
Z—Corporation.

Numerical Finding List¹

Bulletin 2025–26

Announcements:

2025-2, 2025-2 I.R.B. 305
2025-3, 2025-2 I.R.B. 306
2025-4, 2025-2 I.R.B. 306
2025-1, 2025-3 I.R.B. 431
2025-5, 2025-3 I.R.B. 433
2025-6, 2025-5 I.R.B. 526
2025-8, 2025-13 I.R.B. 1384
2025-13, 2025-15 I.R.B. 1392
2025-15, 2025-18 I.R.B. 1420
2025-7, 2025-25 I.R.B. 1600
2025-9, 2025-25 I.R.B. 1601
2025-10, 2025-25 I.R.B. 1602
2025-11, 2025-25 I.R.B. 1603
2025-12, 2025-25 I.R.B. 1604
2025-14, 2025-25 I.R.B. 1605
2025-16, 2025-25 I.R.B. 1609
2025-17, 2025-26 I.R.B. 1620
2025-18, 2025-26 I.R.B. 1621

Notices:

2025-1, 2025-3 I.R.B. 415
2025-2, 2025-3 I.R.B. 418
2025-4, 2025-3 I.R.B. 419
2025-5, 2025-3 I.R.B. 426
2025-3, 2025-4 I.R.B. 488
2025-7, 2025-5 I.R.B. 524
2025-9, 2025-6 I.R.B. 681
2025-10, 2025-6 I.R.B. 682
2025-11, 2025-6 I.R.B. 704
2025-13, 2025-6 I.R.B. 710
2025-6, 2025-8 I.R.B. 799
2025-8, 2025-8 I.R.B. 800
2025-12, 2025-8 I.R.B. 813
2025-14, 2025-10 I.R.B. 980
2025-15, 2025-11 I.R.B. 1089
2025-16, 2025-13 I.R.B. 1378
2025-17, 2025-14 I.R.B. 1387
2025-18, 2025-16 I.R.B. 1416
2025-19, 2025-17 I.R.B. 1418
2025-20, 2025-19 I.R.B. 1423
2025-21, 2025-19 I.R.B. 1424
2025-22, 2025-19 I.R.B. 1427
2025-23, 2025-19 I.R.B. 1428
2025-24, 2025-19 I.R.B. 1429
2025-25, 2025-20 I.R.B. 1445
2025-26, 2025-20 I.R.B. 1445
2025-29, 2025-20 I.R.B. 1445
2025-27, 2025-26 I.R.B. 1611
2025-30, 2025-26 I.R.B. 1615

Proposed Regulations:

REG-117213-24, 2025-3 I.R.B. 433
REG-134420-10, 2025-4 I.R.B. 513
REG-105479-18, 2025-5 I.R.B. 527
REG-116610-20, 2025-5 I.R.B. 638
REG-115560-23, 2025-6 I.R.B. 716
REG-123525-23, 2025-6 I.R.B. 726
REG-124930-21, 2025-7 I.R.B. 772
REG-100669-24, 2025-8 I.R.B. 819
REG-101268-24, 2025-8 I.R.B. 836
REG-107420-24, 2025-8 I.R.B. 854
REG-116085-23, 2025-8 I.R.B. 865
REG-118988-22, 2025-8 I.R.B. 869
REG-107895-24, 2025-9 I.R.B. 972
REG-110878-24, 2025-9 I.R.B. 979
REG-112261-24, 2025-10 I.R.B. 983

Revenue Procedures:

2025-1, 2025-1 I.R.B. 1
2025-2, 2025-1 I.R.B. 118
2025-3, 2025-1 I.R.B. 142
2025-4, 2025-1 I.R.B. 158
2025-5, 2025-1 I.R.B. 260
2025-7, 2025-1 I.R.B. 301
2025-8, 2025-3 I.R.B. 427
2025-9, 2025-4 I.R.B. 491
2025-10, 2025-4 I.R.B. 492
2025-11, 2025-4 I.R.B. 501
2025-12, 2025-4 I.R.B. 512
2025-6, 2025-6 I.R.B. 713
2025-14, 2025-7 I.R.B. 770
2025-13, 2025-8 I.R.B. 816
2025-15, 2025-11 I.R.B. 1090
2025-16, 2025-11 I.R.B. 1100
2025-17, 2025-13 I.R.B. 1382
2025-18, 2025-19 I.R.B. 1430
2025-19, 2025-21 I.R.B. 1447
2025-20, 2025-22 I.R.B. 1448
2025-21, 2025-22 I.R.B. 1448
2025-23, 2025-24 I.R.B. 1476

Revenue Rulings:

2025-1, 2025-3 I.R.B. 307
2025-2, 2025-3 I.R.B. 309
2025-3, 2025-4 I.R.B. 443
2025-4, 2025-7 I.R.B. 758
2025-5, 2025-7 I.R.B. 767
2025-6, 2025-11 I.R.B. 1064
2025-7, 2025-13 I.R.B. 1239
2025-8, 2025-15 I.R.B. 1390
2025-9, 2025-16 I.R.B. 1415
2025-10, 2025-19 I.R.B. 1421
2025-11, 2025-23 I.R.B. 1451
2025-12, 2025-23 I.R.B. 1471

Treasury Decisions:

10016, 2025-3 I.R.B. 313
10020, 2025-3 I.R.B. 408
10018, 2025-4 I.R.B. 446
10019, 2025-4 I.R.B. 482
10017, 2025-5 I.R.B. 517
10028, 2025-6 I.R.B. 660
10022, 2025-8 I.R.B. 773
10026, 2025-9 I.R.B. 878
10027, 2025-9 I.R.B. 897
10029, 2025-9 I.R.B. 936
10030, 2025-11 I.R.B. 1066
10024, 2025-12 I.R.B. 1104
10023, 2025-13 I.R.B. 1259

¹ A cumulative list of all revenue rulings, revenue procedures, Treasury decisions, etc., published in Internal Revenue Bulletins 2024–27 through 2024–52 is in Internal Revenue Bulletin 2024–52, dated December 23, 2024.

Finding List of Current Actions on Previously Published Items¹

Bulletin 2025–26

¹ A cumulative list of all revenue rulings, revenue procedures, Treasury decisions, etc., published in Internal Revenue Bulletins 2024–27 through 2024–52 is in Internal Revenue Bulletin 2024–52, dated December 23, 2024.

Internal Revenue Service

Washington, DC 20224

Official Business
Penalty for Private Use, \$300

INTERNAL REVENUE BULLETIN

The Introduction at the beginning of this issue describes the purpose and content of this publication. The weekly Internal Revenue Bulletins are available at www.irs.gov/irb/.

We Welcome Comments About the Internal Revenue Bulletin

If you have comments concerning the format or production of the Internal Revenue Bulletin or suggestions for improving it, we would be pleased to hear from you. You can email us your suggestions or comments through the IRS Internet Home Page (www.irs.gov) or write to the Internal Revenue Service, Publishing Division, IRB Publishing Program Desk, 1111 Constitution Ave. NW, IR-6230 Washington, DC 20224.