

TUESDAY, MAY 3

7:30 a.m. – 5:00 p.m.	Registration 4th Floor
7:30 a.m. – 8:30 a.m.	Continental Breakfast
8:30 a.m. – 9:30 a.m.	<p>Washington Report</p> <p>SPEAKERS: Tuck Shumack, <i>Ogilvy Government Relations</i> Gordon Taylor, <i>Ogilvy Government Relations</i> Dee Buchanan, <i>Ogilvy Government Relations</i></p>
9:30 a.m. – 10:30 a.m.	<p>Litigation and Tax Controversy Update</p> <p>SPEAKERS: Richard Hussein, <i>Kirkland & Ellis</i> Leah Patrick, <i>Kirkland & Ellis</i></p>
10:30 a.m. – 10:50 a.m.	Break
10:50 a.m. – 12:00 p.m.	<p>Making Tax Relevant: Best Practices for Tax to Leverage and Capitalize on Large Enterprise-Wide Technology & Transformative Issues</p> <p>SPEAKER: Ana Roland, <i>Deloitte</i> Kevin Smith, <i>Deloitte</i> Dan Cowan, <i>Deloitte</i> Joanna Hogrefe, <i>Deloitte</i></p>

TUESDAY, MAY 3

12:00 p.m. – 1:15 p.m.	Lunch
1:15 p.m. – 2:30 p.m.	Accounting & Compliance Update SPEAKER: Maria Collman, <i>PwC</i> Damien Boudreau, <i>PwC</i> Scott Skarda, <i>PwC</i> Nolan Ogden, <i>PwC</i>
2:30 p.m. – 3:40 p.m.	IRS Update SPEAKERS: David Fischer, <i>Crowell & Moring</i> David Blair, <i>Crowell & Moring</i>
3:40 p.m. – 3:50 p.m.	Break
3:50 p.m. – 5:00 p.m.	The Energy Transition – Structuring, Financing, and the Evolving Credit Landscape SPEAKERS: Dan Kiely, <i>Mayer Brown</i> Greg Matlock, <i>EY</i>
5:00 p.m. – 6:00 p.m.	Networking Reception

PROGRAM AGENDA

WEDNESDAY, MAY 4

7:30 a.m. – 5:00 p.m.	Registration 4th Floor	
7:30 a.m. – 8:30 a.m.	Continental Breakfast	
	Domestic Breakout Session <i>Check signs for room location</i>	International Breakout Session <i>Check signs for room location</i>
8:30 a.m. – 9:30 a.m.	Finding the Tax Easter Eggs Hidden in ESG Incentives SPEAKERS: Barbara De Marigny, <i>Baker Botts LLP</i> Mike Bresson, <i>Baker Botts LLP</i>	OECD Update SPEAKER: Jeff Vanderwolk, <i>SquirePattonBoggs</i>
9:30 a.m. – 10:30 a.m.	Partnership & Pass-Through Investment Structures SPEAKERS: Steven Lorch, <i>Bracewall</i> Don Lonczak, <i>Bracewall</i>	International Tax Agreements in an Era of Congressional and Political Polarization SPEAKERS: Loren Ponds, <i>Miller & Chevalier</i> Rocco Femia, <i>Miller & Chevalier</i>
10:30 a.m. – 10:50 a.m.	Break	
10:50 a.m. – 12:00 p.m.	Disappearing NOLs - Key Planning Considerations in a Cash Tax World for O&G Companies with Minimal Cash Tax Burdens SPEAKER: James Toups, <i>Deloitte</i> Stephanie Rohrbach, <i>Deloitte</i> Michelle Abel, <i>Deloitte</i> Erin Tucker, <i>Deloitte</i>	International Planning for O&G Transactions (M&A) SPEAKER: Ronald Dabrowski, <i>KPMG</i> Jeff Dodson, <i>KPMG</i> Grant Gooding, <i>KPMG</i>

WEDNESDAY, MAY 4

12:00 p.m. – 1:15 p.m.	Lunch	
	Domestic Breakout Session <i>Check signs for room location</i>	International Breakout Session <i>Check signs for room location</i>
1:15 p.m. – 2:30 p.m.	<p>174 vs. 263C - What has Changed, What has Not</p> <p>SPEAKER:</p> <p>Bret Oliver, <i>PwC</i> Kristynn Saxton, <i>PwC</i> Dennis Scullin, <i>PwC</i></p>	<p>Am I Creditable? The Foreign Tax Credit Under the New Treasury Regulations</p> <p>SPEAKER:</p> <p>Ernesto Galvan, <i>PwC</i> Bobby Gardner, <i>PwC</i> Nita Asher, <i>PwC</i></p>
2:30 p.m. – 3:40 p.m.	<p>Sub-K Update</p> <p>SPEAKERS:</p> <p>Timothy Chan, <i>KPMG</i> Rachelle Michaelson, <i>KPMG</i> Sarah Lee, <i>KPMG</i></p>	<p>Transfer Pricing, International Tax, and Related Controversy Topics for the Energy Industry</p> <p>SPEAKERS:</p> <p>Purvez Captain, <i>EY</i> John Fiorito, <i>EY</i> Timothy Gowens, <i>EY</i> Wes Poole, <i>EY</i></p>
3:40 p.m. – 3:50 p.m.	Break	
3:50 p.m. – 5:00 p.m.	<p>45Q Planning for Carbon Capture Projects</p> <p>SPEAKER:</p> <p>Greg Matlock, <i>EY</i> Dorian Hunt, <i>EY</i> Mike Alvarez, <i>EY</i></p>	<p>Going Back to Basics - Expense Apportionment for Foreign Tax Credit Purposes - Guidance on the Apportionment of Interest, R&E, Stewardship & State Tax Expenses</p> <p>SPEAKER:</p> <p>Aric Mann, <i>Deloitte</i> Caren Shein, <i>Deloitte</i> Kyle Lumpkins, <i>Deloitte</i></p>