



Wolfram Pohl

Partner

San Francisco

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Practice Areas

- Tax

Honors

- Next Generation Lawyer for Energy: renewable/alternative, *The Legal 500 USA* (2019)

Education

- J.D., University of California, Berkeley School of Law, 2009
- B.E., Mechanical Engineering, McGill University, 2004

Memberships

- State Bar of California, Taxation Section

Wolfram Pohl, a partner in the San Francisco office, is a member of the Tax Group. His practice focuses on the tax aspects of corporate transactions, municipal finance and project finance.

He has expertise on the tax implications of transactions involving energy projects and public infrastructure projects. He has represented developers and tax investors in financings for both wind and solar projects. Wolfram has experience in structuring and negotiating transactions to take advantage of tax credits, Treasury cash grants, depreciation benefits, and other available tax benefits. His practice also focuses on tax-exempt bond financings for multifamily housing projects. He has experience in a variety of tax issues, including equity and debt financings, mergers and acquisitions, public offerings, and real estate transactions.

Representative Engagements

Current representative transactions include advising:

- A wind developer in tax credit equity financing for a 200 MW wind project eligible for production tax credits.
- A renewable power plant owner and operator in the acquisition of a 930 MW portfolio of seven wind power plants
- A wind developer in the sale of a 182 MW wind project eligible for production tax credits.
- A wind farm owner, in tax credit equity financing for a 91 MW wind project eligible for production tax credits.
- A solar developer in the sale of a 30 MW solar power project eligible for a Treasury cash grant.
- A Spanish renewable energy company in the sale of a partial stake in a portfolio of United States wind farm assets totaling 599 MW.
- A fuel cell developer in a partnership flip transaction for ITC eligible fuel cell servers.
- A tax credit investor in a partnership flip transaction for ITC an eligible solar project.
- The concessionaire in a public highway concession agreement to design, build, and operate highway express toll lanes.

- A solar developer in tax credit equity financing for a 100 MW ITC-eligible solar project in California.
- A solar developer in tax credit equity financing for a 60 MW ITC-eligible solar project in California.
- A solar developer in tax credit equity financing for two ITC-eligible solar projects in Massachusetts.

Publications

- Co-Author, “Come Rain Or Shine: Structuring US Tax Equity,” *Project Finance International*, November 29, 2017

Admissions

- California