

## Part III

### Administrative, Procedural, and Miscellaneous

#### Manufacturer Registration and Written Agreement, Qualified Product Identification Number Assignment, Labeling, and Periodic Reporting Requirements Under Section 25C(h)

Rev. Proc. 2024-31

#### **SECTION 1. PURPOSE**

This revenue procedure provides the procedures and requirements that a manufacturer of specified property must follow to be treated as a “qualified manufacturer” (QM) under § 25C(h) of the Internal Revenue Code (Code).<sup>1</sup> Section 25C(h)(1) provides that no credit will be allowed under § 25C(a) with respect to any item of specified property placed in service after December 31, 2024, unless such item is produced by a QM and the taxpayer includes the qualified product identification number (PIN) of such item on the taxpayer’s tax return for the taxable year. This revenue procedure provides that a manufacturer that wishes to become a QM must register and

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<sup>1</sup> Unless otherwise specified, all “Section” or “§” references are to sections of the Code.

enter into an agreement with the Internal Revenue Service (IRS), assign a PIN unique to each item of specified property, label such items, and make periodic written reports to the IRS of the PINs so assigned.

## **SECTION 2. BACKGROUND**

### .01 Inflation Reduction Act Changes to § 25C.

(1) Congress originally enacted § 25C in § 1333(a) of the Energy Policy Act of 2005, Public Law 109-58, 119 Stat. 594, 1026 (August 8, 2005) to provide a “nonbusiness energy property credit” for the purchase and installation of certain energy efficient improvements in a taxpayer’s principal residence (§ 25C credit). Congress amended § 25C several times, most recently by § 13301 of Public Law 117-169, 136 Stat. 1818, 1941 (August 16, 2022), commonly known as the Inflation Reduction Act of 2022 (IRA), which renamed this provision the “energy efficient home improvement credit.”

(2) Former § 25C expired with respect to any property placed in service after December 31, 2021. Section 13301(i) of the IRA provides that except as otherwise provided in § 13301(i)(2) and (3), the IRA amendments to § 25C apply to property placed in service after December 31, 2022. Section 13301(i)(2) of the IRA provides that the amendments made by § 13301(a) of the IRA apply to property placed in service after December 31, 2021. Section 13301(a) of the IRA extended the § 25C credit with respect to any property placed in service through December 31, 2032. Section 13301(i)(3) of the IRA provides that the amendments made by § 13301(g) of the IRA apply to property placed in service after December 31, 2024. Section 13301(g) of the IRA amended § 25C by redesignating former subsection (h) as subsection (i) and

inserting a new subsection (h), which is described in section 2.02 of this revenue procedure.

(3) Section 25C, as amended by § 13301(b) and (f) of the IRA, allows an individual taxpayer (taxpayer) for the taxable year a credit equal to 30 percent of the total amount paid or incurred by the taxpayer during such taxable year for qualified energy efficiency improvements installed during such taxable year, residential energy property expenditures, and home energy audits. As amended by § 13301(c) of the IRA, the amount of the § 25C credit generally is limited under section 25C(b)(1) to \$1,200 with respect to any taxpayer for any taxable year. Within this \$1,200 limitation, § 25C(b) sets forth further annual limitations for certain categories of improvements. Section 25C(b)(2) provides that the credit allowed under § 25C(a)(2) is limited to \$600 with respect to any taxpayer for any taxable year with respect to any item of qualified energy property. Section 25C(b)(3) provides that the credit allowed under § 25C(a)(1) with respect to any taxpayer for any taxable year is limited to \$600 in the aggregate with respect to all exterior windows and skylights. Section 25C(b)(4) provides that the credit allowed under § 25C(a)(1) with respect to any taxpayer for any taxable year is limited to \$250 in the case of any exterior door and \$500 in the aggregate with respect to all exterior doors. Section 25C(b)(6) limits the credit allowed under § 25C(a)(3) for a home energy audit to \$150. Additionally, notwithstanding the general \$1,200 annual limitation (and the internal limitations within the general \$1,200 annual limitation), § 25C(b)(5) provides that the credit allowed under § 25C(a)(2) with respect to any taxpayer for any taxable year is limited to \$2,000 in the aggregate with respect to amounts paid or incurred for an electric or natural gas heat pump water heater described in

§ 25C(d)(2)(A)(i), an electric or natural gas heat pump described in § 25C(d)(2)(A)(ii), and a biomass stove or boiler described in § 25C(d)(2)(B).

.02 Section 25C(h) Requirements.

(1) Section 25C(h)(1) provides that no § 25C credit is allowed with respect to any item of specified property placed in service after December 31, 2024, unless—

(a) such item is produced by a QM, and

(b) the taxpayer includes the PIN of such item on the tax return for the taxable year.

(2) Section 25C(h)(2) defines the term “qualified product identification number” as, with respect to any item of specified property, the product identification number that the QM assigned to such item pursuant to the methodology referred to in § 25C(h)(3).

(3) Section 25C(h)(3) defines the term “qualified manufacturer” as any manufacturer of specified property that enters into an agreement with the Secretary of the Treasury or the Secretary of the Treasury’s delegate (Secretary) that provides that such manufacturer will—

(a) assign a product identification number to each item of specified property produced by such manufacturer, using a methodology that will ensure that such number (including any alphanumeric) is unique to each such item, by using numbers or letters unique to such manufacturer or by such other method as the Secretary may provide (PIN assignment requirement),

(b) label such item with such product identification number in such manner as the Secretary may provide (PIN labeling requirement), and

(c) make periodic written reports to the Secretary (at such times and in such

manner as the Secretary may provide) of the product identification numbers so assigned and including such information as the Secretary may require with respect to the items of specified property to which such product identification numbers were so assigned (periodic written report requirement) (collectively, QM PIN requirements).

(4) Section 25C(h)(4) defines the term “specified property” as—

(a) any “qualified energy property,” and

(b) exterior windows (including skylights) and exterior doors described in § 25C(c)(3)(B) and (C).

(5) Section 25C(d)(2) defines the term “qualified energy property” as any of the following:

(a) Any of the following that meet or exceed the highest efficiency tier (not including any advanced tier) established by the Consortium for Energy Efficiency that is in effect as of the beginning of the calendar year in which the property is placed in service:

(i) An electric or natural gas heat pump water heater.

(ii) An electric or natural gas heat pump.

(iii) A central air conditioner.

(iv) A natural gas, propane, or oil water heater.

(v) A natural gas, propane, or oil furnace or hot water boiler.

(b) A biomass stove or boiler that—

(i) uses the burning of biomass fuel to heat a dwelling unit located in the United States and used as a residence by the taxpayer, or to heat water for use in such a dwelling unit, and

(ii) has a thermal efficiency rating of at least 75 percent (measured by the higher heating value of the fuel).

(c) Any oil furnace or hot water boiler that—

(i) is placed in service after December 31, 2022, and before January 1, 2027, meets or exceeds 2021 Energy Star certified efficiency criteria, and is rated by the manufacturer for use with fuel blends at least 20 percent of the volume of which consists of an eligible fuel (defined in § 25C(d)(3)) (eligible fuel), or

(ii) is placed in service after December 31, 2026, achieves an annual fuel utilization efficiency rate of not less than 90, and is rated by the manufacturer for use with fuel blends at least 50 percent of the volume of which consists of an eligible fuel.

(d) Any improvement to, or replacement of, a panelboard, sub-panelboard, branch circuits, or feeders that—

(i) is installed in a manner consistent with the National Electric Code,

(ii) has a load capacity of not less than 200 amps,

(iii) is installed in conjunction with—

(I) any qualified energy efficiency improvements, or

(II) any qualified energy property described in § 25C(d)(2)(A) through (C) for which a § 25C credit is allowed for expenditures with respect to such property, and

(iv) enables the installation and use of any qualified energy efficiency improvements or any qualified energy property described in § 25C(d)(2)(A) through (C).

.03 Proposed Regulations. In conjunction with the publication of this revenue procedure, the Department of the Treasury (Treasury Department) and the IRS are publishing a notice of proposed rulemaking (REG-118264-23) in the *Federal Register*

(XX F.R. XXXXX) under § 25C (proposed regulations). The proposed regulations would provide rules for manufacturers of specified property to register to be qualified manufacturers and satisfy certain other requirements, and rules for taxpayers to calculate the credit.

### **SECTION 3. DEFINITIONS**

.01 Generally. Terms used in this revenue procedure and not otherwise defined in this revenue procedure have the same meaning as in § 25C and the proposed regulations thereunder, and will have the same meaning as in the final regulations thereunder (once issued).

.02 Relevant Geographic Climate Zone. Exterior windows, skylights, doors, and heat pumps are subject to different efficiency requirements in different geographic areas of the United States. The term “relevant geographic climate zone” refers to the applicable climate zone for the applicable specified product. Energy Star is a voluntary labeling and rating program administered by the U.S. Environmental Protection Agency that determines the applicable climate zones for exterior windows, skylights, and doors. See <https://www.energystar.gov>. The Consortium for Energy Efficiency (CEE), a nonprofit consortium consisting primarily of utility efficiency program administrators across the United States and Canada, determines the applicable climate zones for heat pumps. See <https://cee1.org>.

### **SECTION 4. QM REGISTRATION AND WRITTEN AGREEMENT**

.01 Registration, Application, and Agreement with the IRS.

(1) General Overview. To become a QM as defined in § 25C(h)(3), a manufacturer of specified property must enter into an agreement with the IRS. Except as provided in

section 4.02 of this revenue procedure, manufacturers are not QMs until they have entered into and attested to an agreement as described in section 4.01(2) and (3) of this revenue procedure that has been validated by the IRS.

(2) Manufacturer Registration and QM Written Agreement through IRS Energy Credits Online Portal. An individual representative of the manufacturer who is authorized to bind the manufacturer in matters involving agreements with the IRS (authorized representative) must register through the IRS Energy Credits Online Portal and provide the required information to complete the manufacturer's application and enter into an agreement (QM Registration Application and Agreement) on the manufacturer's behalf. The authorized representative will need an account on <https://www.irs.gov> to verify the manufacturer's business tax information and to register the manufacturer. Help related to the IRS identity verification process can be found on the sign-in page or at [www.irs.gov/registerhelp](http://www.irs.gov/registerhelp). The authorized representative must execute the manufacturer's QM Registration Application and Agreement on the IRS Energy Credits Online Portal. Specifically, the representative must provide the following information and make the following certifications:

- (a) The manufacturer's name and business address;
- (b) The authorized representative's telephone number and email address;
- (c) The manufacturer's Taxpayer Identification Number (TIN) or Employer Identification Number (EIN);
- (d) A listing of the categories of specified property that the manufacturer produces or intends to produce. (The application will provide a menu of property categories from which the manufacturer must select one or more categories.);

(e) A certification that the manufacturer produces specified property as defined in § 25C(h)(4);

(f) A certification that the manufacturer agrees to assign a PIN to each item of specified property produced by such manufacturer using the methodology described in section 5 of this revenue procedure (or any successor guidance), that the manufacturer agrees to label each item of specified property with a PIN in the manner described in section 6 of this revenue procedure (or any successor guidance), and that the manufacturer agrees to submit required periodic written reports to the IRS of the PINs assigned in the manner described in section 7 of this revenue procedure (or any successor guidance);

(g) If the manufacturer is filing as part of a consolidated group, the name and EIN of the corporation filing the consolidated income tax return; and

(h) Such other information and certifications that the IRS Energy Credits Online Portal may require. The IRS may update the required information and certifications in guidance, on <https://www.irs.gov>, or via the IRS Energy Credits Online Portal.

(3) Penalties of Perjury. The authorized representative must sign the QM Registration Application and Agreement, and also must include the following statement, signed under penalties of perjury: “Under penalties of perjury, I declare that I have examined this QM Registration Application and Agreement, including any and all accompanying documents, and to the best of my knowledge, the facts presented in this application are true, correct, and complete.” The authorized representative must execute this signature electronically within the IRS Energy Credits Online Portal.

(4) Requirement for Multiple Manufacturers.

(a) In general. If more than one manufacturer participates in the production of the same product that is specified property, only one manufacturer may be the QM with respect to such product. Only the manufacturer whose production results in the product becoming specified property must register with the IRS to become a QM with respect to such property, absent an agreement otherwise among such manufacturers providing that a different one of the manufacturers is required to register with the IRS to become a QM with respect to the property. Any manufacturer that agrees to become a QM with respect to the property must retain a copy of the agreement in the manufacturer's books and records.

(b) Example. Manufacturers A and B are involved in the production of a glass window. In the chain of production, A cuts the glass to the desired dimensions, and cleans and seals the panes of glass. B cuts and welds the frames. A then assembles the frames and glass into an exterior window that meets the requirements of specified property. Because A's process of assembling the frames and glass results in the window becoming specified property, absent an agreement between A and B under which B is required to register with the IRS to become a QM with respect to the window, A must enter into an agreement with the IRS to become the QM with respect to the window.

(5) Special Requirement for Manufacturers of Enabling Property. A manufacturer that produces enabling property<sup>2</sup> must follow the registration, application, and written agreement process described in this section 4, even if the manufacturer produces no

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<sup>2</sup> Defined in § 1.25C-1(b)(6) of the proposed regulations.

other type of specified property, despite modified requirements with respect to enabling property elsewhere in this revenue procedure.

(6) Special Requirements for Certain Manufacturers of Heat Pumps. A manufacturer that produces only the indoor unit of a heat pump, but does not manufacture outdoor units of a heat pump, must follow the registration, application, and written agreement process described in this section 4, even if the manufacturer produces no other type of specified property, despite modified requirements with respect to heat pumps elsewhere in this revenue procedure.

(7) Validation. After the manufacturer submits a complete QM Registration Application and Agreement through the IRS Energy Credits Online Portal, the IRS will validate the QM Registration Application and Agreement, taking into account the manufacturer's North American Industry Classification System (NAICS) Code. In the event the manufacturer fails the validation process, or the IRS requires missing or supplemental information or certifications, the IRS will contact the manufacturer's authorized representative.

(8) Acceptance, QM Code and List of QMs. After reviewing a manufacturer's QM Registration Application and Agreement, the IRS will notify the manufacturer if the manufacturer's registration is accepted or rejected. If the IRS accepts the QM Registration Application and Agreement, the IRS will send a certification to the manufacturer's authorized representative through the IRS Energy Credits Online Portal. The IRS also will assign and issue a unique 4-character QM Code to the manufacturer through the IRS Energy Credits Online Portal. The IRS will publish a list of QMs and the date that their application was accepted on <https://www.irs.gov>. Except as provided

in section 4.02 of this revenue procedure, no § 25C credit is allowed for any specified property produced by a manufacturer prior to the date that the IRS accepts a manufacturer as a QM, as such property is not considered produced by a QM under § 25C(h)(1)(A). Any manufacturer entering into a QM Registration Application and Agreement agrees to have its name listed as a QM on <https://www.irs.gov>.

.02 Special Registration Procedure for 2025. Any manufacturer that submits its QM Registration Application and Agreement by April 30, 2025, will be deemed to have been a QM as of December 31, 2024, provided such QM Registration Application and Agreement is validated by the IRS. Accordingly, for a manufacturer that meets the requirements of the Special Registration Procedure for 2025, any specified property produced by such manufacturer on or after January 1, 2025, and on or before April 30, 2025, will be deemed to have been produced by a QM.

.03 Suspension or Revocation of Registration. The IRS may suspend or revoke a QM registration in the IRS's sole discretion if the IRS concludes that the manufacturer is not in compliance with the PIN assignment requirement in section 5 of this revenue procedure, the PIN labeling requirement in section 6 of this revenue procedure, or the periodic written report requirement in section 7 of this revenue procedure, or other QM requirements published in the Internal Revenue Bulletin, on <https://www.irs.gov>, or via the IRS Energy Credits Online Portal. The IRS will notify the manufacturer's authorized representative that the QM registration has been suspended or revoked. The list of QMs published by the IRS will be updated to reflect suspensions and revocations.

.04 Administrative Review of a Rejection, Suspension or Revocation of QM status. If the IRS rejects a QM Registration Application and Agreement or if the IRS revokes or

suspends a manufacturer's QM registration status, then the manufacturer may request administrative review of the IRS's determination by the IRS. During the period that such review is pending, the manufacturer will not be a QM. Any IRS determination relating to the rejection of a QM Registration Application and Agreement, or the revocation or suspension of a manufacturer's QM registration status is not subject to administrative appeal to the IRS Independent Office of Appeals.

.05 Voluntary Discontinuance of QM status. A QM may discontinue its QM status by sending a secure message to the IRS through the IRS Energy Credits Online Portal and filing a final QM Report, as provided in section 7.12 of this revenue procedure. The secure message must state that the QM is terminating its QM status and provide the date that the final QM Report will be filed. The IRS will process such requests, and the QM's status will be discontinued as of the date the final QM report is filed through the IRS Energy Credits Online Portal. A QM that discontinues its QM status will no longer be included on the list of QMs published by the IRS. The IRS will publicize discontinued QM status information on <https://www.irs.gov>. All PINs reported in the final QM Report, or in QM Reports filed previously by the QM, will continue to be valid PINs for purposes of the § 25C credit despite the discontinued QM status.

## **SECTION 5. PIN ASSIGNMENT REQUIREMENT**

.01 In General. To satisfy the PIN assignment requirement in § 25C(h)(3)(A), QMs must employ the PIN assignment system described in this section 5 (PIN Assignment System).

.02 Specifics of the PIN Assignment System. Except as provided in sections 5.03 through 5.06 of this revenue procedure, QMs must assign a 17-character PIN unique to

each item of specified property. The PIN for each item of specified property is made up of three parts and may contain alphanumeric characters (including the common digits 0 to 9 and capital letters A to Z, other than I or O,<sup>3</sup> but not special characters such as \*, &, @, etc.):

(1) Part 1: QM Code. The first part of the PIN is the manufacturer's four-character QM Code. When the IRS validates a QM Registration Application and Agreement, the IRS will assign a QM Code to the QM.

(2) Part 2: Product Code. The second part of the PIN is one character (that is, character 5 of the PIN) and is a "Product Code." The Product Code is assigned by the QM in accordance with a list of Product Codes on <https://www.irs.gov>, on the IRS Energy Credits Online Portal, or in future published guidance. This character represents the category of specified property and, if applicable, the relevant geographic climate zone.

(3) Part 3: Item Number. The last twelve characters of the PIN (that is, characters 6 through 17 of the PIN) must represent the specific "Item Number" that is unique to each item of specified property. The QM may choose any twelve alphanumeric characters (including the common digits 0 to 9 and capital letters A to Z, other than I or O, but not special characters such as \*, &, @, etc.) for the Item Number, provided that the result is a unique Item Number, and provided that the Item Number does not employ leading zeroes. The IRS encourages QMs to employ nonsequential characters.

.03 Specified Property Placed in Service During the 2025 Calendar Year.

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<sup>3</sup> The letters I and O may not be used because they are easily mistaken for the numbers 1 and 0.

Notwithstanding section 5.02 of this revenue procedure, for all specified property placed in service on or after January 1, 2025, and before January 1, 2026, a QM can satisfy the § 25C(h)(3)(A) PIN assignment requirement with its QM Code in lieu of its PIN. For specified property placed in service in 2025, taxpayers may use the QM code in lieu of a PIN.

.04 Enabling Property. For enabling property, regardless of whether the enabling property is placed in service after December 31, 2025, a QM can satisfy the § 25C(h)(3)(A) PIN assignment requirement by using its QM Code in lieu of its PIN, and taxpayers claiming the section 25C credit may use the QM Code in lieu of a PIN. Nothing in section 5.04 of this revenue procedure negates the need for the QM to provide a 17-digit PIN as described in section 5.02 of this revenue procedure for other specified property, or for the taxpayer to provide a 17-digit PIN as described in section 5.02 of this revenue procedure for any other specified property, including enabled property, on the taxpayer's tax return.

.05 Heat Pumps. With respect to a heat pump that meets the requirements of § 25C(d)(2)(ii), only the outdoor unit of such heat pump must be assigned a PIN; QMs can satisfy the QM PIN requirements without assigning a PIN to the indoor unit of such heat pump. Nothing in section 5.05 of this revenue procedure negates the need for a manufacturer to register to be a QM under section 4 of this revenue procedure, despite modified requirements applicable to QMs elsewhere in this revenue procedure.

.06 Timing of PIN Assignment Requirement in section 5.02. A QM must assign PINs described in section 5.02 of this revenue procedure to each item of specified property that they produce beginning on January 1, 2026, while the item is in the QM's

possession. For items of property that the QM produces before January 1, 2026, the QM may, but is not required to, assign PINs in accordance with section 5.02 of this revenue procedure, during the manufacturing process, or after items are no longer in the QM's possession, provided that the QM furnishes the PINs to taxpayers within the time frames set forth in section 6 of this revenue procedure.

.07 Examples. The following are example of PINs that satisfy the PIN Assignment System requirements.

(1) XYZ Corp manufactures energy efficient windows that meet the relevant standards in the northern climate zone to qualify for the § 25C credit. On January 6, 2025, XYZ Corp's authorized representative timely and properly executes and submits a QM Registration Application and Agreement on behalf of XYZ Corp. On February 3, 2025, the IRS notifies XYZ Corp that the IRS validated XYZ Corp's QM Registration Application and Agreement and assigned "A1A1" as the company's QM Code.

(2) During the 2025 taxable year, XYZ Corp manufactures a line of energy efficient windows that meets the relevant standards in the northern climate zone to qualify for the § 25C credit for the 2025 taxable year. XYZ Corp calls this product line the Red window models. In the 2025 taxable year, XYZ Corp sold 2,500 Red windows, and received 2,000 requests for PINs from taxpayers. XYZ Corp must provide the QM Code, "A1A1," to those taxpayers in the 2025 taxable year. If any of the Red windows are placed in service in the 2026 taxable year or later, assuming the windows still qualify for the § 25C credit, then XYZ Corp must provide taxpayers with the 17-digit PIN as described in section 5.02 of this revenue procedure.

(3) In the 2026 taxable year, XYZ Corp manufactures two lines of energy efficient

windows that meet the relevant standards in the northern climate zone to qualify for the § 25C credit. XYZ Corp calls these product lines, respectively, the Blue and White window models. XYZ Corp manufactures 10,000 Blue windows and 10,000 White windows in 2026, or 20,000 windows in total. The Product Code for both lines of XYZ Corp's windows is "2," based on the northern climate zone.

(4) XYZ Corp assigns PINs to its items of specified property while they are still in XYZ Corp's possession, as follows:

(a) Characters 1 through 4 of the PIN for each of the 20,000 windows are the characters in the company's QM Code, "A1A1."

(b) Character 5 of the PIN is "2" representing each window's Product Code.

(c) XYZ Corp assigns Item Numbers "BLUE12345000" through "BLUE22344000" as characters 6 through 17 of the PIN for the 10,000 Blue windows and Item Numbers "WHITE5678900" through "WHITE6678800" as characters 6 through 17 of the PIN for the 10,000 White windows.

(5) For example, XYZ Corp will assign the PIN "A1A12BLUE12345000" to the first 2026 taxable year Blue window to which XYZ Corp assigns a PIN and the PIN "A1A12WHITE5740100" to the 613<sup>th</sup> 2026 taxable year White window to which XYZ Corp assigns a PIN.

## **SECTION 6. PIN LABELING REQUIREMENT**

.01 In General. To satisfy the PIN labeling requirement in § 25C(h)(3)(B), a QM must label each item of specified property with a PIN using a method allowed in this section 6, and must furnish the PIN to taxpayers in accordance with this section 6.

.02 Method of Labeling. QMs may choose the method for labeling products,

provided that the PIN is furnished to the taxpayer in the time frame set forth in section 6.03 of this revenue procedure. For example, a QM may add the PIN to the item of specified property by affixing a label to the product or by etching the PIN on the product itself. Alternatively, a QM may affix a label containing the PIN to the item's packaging, print the PIN directly on the packaging, or include a document containing the PIN inside the item's packaging. The IRS urges QMs not to place a product's PIN on the exterior packaging of the product, which could cause difficulties in the administration of the section 25C credit through misuse of PINs. For property that is no longer in a QM's control, a QM may provide a website where taxpayers may obtain a PIN by entering their purchase information.

.03 Time to Furnish PINs to Taxpayers; No Prerequisites to Receiving the PIN.

(1) In general. For specified property placed in service on or after January 1, 2025, and before January 1, 2026, in order to comply with the PIN labeling requirement, a QM must provide its QM Code (which will be accepted by the IRS in lieu of a PIN with respect to this period only) to taxpayers who purchase items of specified property by no later than the date— (i) when the taxpayer places the specified property in service, (ii) when the taxpayer requests a PIN from the QM, or (iii) when the manufacturer becomes a QM, whichever is latest. For specified property placed in service on or after January 1, 2026, in order to comply with the PIN labeling requirement, a QM must make its PINs available to the taxpayer no later than the date when the taxpayer either places the specified property in service, or requests a PIN from the QM, whichever is later. For any specified property produced in calendar year 2025 and placed in service on or after January 1, 2026, and to which only a QM Code has been assigned, the QM must make

the full 17-digit PIN available to the taxpayer upon request by the taxpayer.

(2) No Prerequisites to Receive a PIN. A QM may not set prerequisites to a taxpayer receiving a PIN that are not required to verify the purchase of the specified property, such as requiring taxpayers to sign up for promotional emails, texts, or other communications from the QM, its related entities, or partners. However, PINs may be provided through the mail, online, through email, or other means of electronic delivery. PINs may be provided in conjunction with a formal registration for a warranty provided that the taxpayer can easily obtain the PIN without completing the formal warranty registration.

.04 Enabling Property. For enabling property, regardless of whether the enabling property is placed in service after December 31, 2025, the § 25C(h)(3)(B) PIN labeling requirement is met if the QM furnishes its QM Code to taxpayers who purchase items of enabling property. Nothing in section 6.04 of this revenue procedure negates the need for a taxpayer to provide the PIN of the enabled property on the taxpayer's tax return.

.05 PIN Labeling for Heat Pumps. Because only the outdoor unit of a heat pump that meets the requirements of § 25C(d)(2)(ii) must be assigned a PIN, manufacturers are not required to label the indoor unit of a heat pump. Nothing in section 6.05 of this revenue procedure negates the need for a manufacturer to register to be a QM under section 4 of this revenue procedure, even if the manufacturer only produces indoor units of a heat pump, despite modified requirements applicable to those QMs elsewhere in this revenue procedure.

## **SECTION 7. PERIODIC WRITTEN REPORT REQUIREMENT**

.01 In General. To meet the periodic written report requirement in § 25C(h)(3)(C), a

QM must submit periodic reports (QM Reports) to the IRS electronically through the IRS Energy Credits Online Portal, in the time and manner described in this section 7.

.02 General Information to Include in the QM Report. Except as provided in sections 7.05 through 7.07 of this revenue procedure, a QM must include certain general information in every QM Report, including:

(1) the QM's name, address, and TIN or EIN;

(2) for each item of specified property that the QM produced during the period covered by the QM Report,

(a) such item's full PIN, including its QM Code, Product Code, and Item Number (except as provided in section 7.05 of this revenue procedure), and

(b) such item's month and year of manufacture;

(3) such other information as the IRS may provide on <https://www.irs.gov>, on the IRS Energy Credits Online Portal, or in published guidance.

.03 Attestation. Each QM Report must include a declaration, applicable to the certification, statements, and any accompanying documents, signed by an individual authorized to bind the QM in matters involving agreements with the IRS, in the following form: "Under penalties of perjury, I declare that I have examined this certification, including any and all accompanying documents, and that to the best of my knowledge, the facts presented in support of this certification are true, correct, and complete."

.04 Year of Manufacture. For QM Reports, the year of manufacture is the year in which the property becomes specified property for purposes of the § 25C credit.

.05 Specified Property Placed in Service During the 2025 Calendar Year. For specified property placed in service on or after January 1, 2025, and before January 1,

2026, to satisfy the requirement to provide each item's full PIN under section 7.02(2)(a) of this revenue procedure, the QM Report only has to include the QM Code that was provided to taxpayers in accordance with sections 5.03 and 6.03(1) of this revenue procedure.

.06 Exception for Enabling Property. A QM is not required to submit QM Reports for enabling property.

.07 Exception for Indoor Units of Heat Pumps. A QM is not required to submit QM Reports for the indoor units of heat pumps.

.08 Time to File QM Reports.

(1) For items of specified property that leave a QM's control and enter the stream of commerce on or after January 1, 2025, and before January 1, 2026, only one QM Report is required, and a QM must file that report by January 15, 2026. A QM may submit multiple QM Reports once the IRS Energy Credits Online Portal begins accepting QM Reports.

(2) For items of specified property produced on or after January 1, 2026, a QM must file QM Reports by the fifteenth day of the calendar month following the end of the calendar quarter in which an item of specified property leaves its control and enters the stream of commerce (January 15, April 15, July 15, and October 15). A QM may submit QM Reports more frequently than once per quarter.

.09 Format of QM Reports. QMs must submit their QM Reports electronically using the template that the IRS will make available on the IRS Energy Credits Online Portal. The IRS will not accept QM Reports submitted in any other format. In considering how frequently to file QM Reports, QMs should consult the IRS Energy Credits Online Portal

for current file format and size limitations.

.10 Updating and Rescinding QM Reports. If a QM wishes to update or rescind certain information on a QM report for a scrivener's error or missing PIN, the QM must do so through the IRS Energy Credits Online Portal as promptly as possible after its original submission.

.11 IRS Acknowledgement of QM Reports. Any acknowledgment that the IRS provides in response to a QM Report, such as an acknowledgement of receipt, does not constitute an IRS determination that any item of specified property qualifies for the § 25C credit or a verification of any statement in the QM Report.

.12 Final QM Report for Voluntary Discontinuance. A QM that discontinues its QM status as provided in section 4.05 of this revenue procedure must submit a final QM Report with the IRS through the IRS Energy Credits Online Portal. The final QM Report must account for all remaining specified property produced by the QM and assigned a PIN, and not reported to the IRS in prior QM Reports, until the date the final QM Report is filed. The QM must check the box marking the final QM Report as final.

## **SECTION 8. PAPERWORK REDUCTION ACT**

.01 The Paperwork Reduction Act of 1995 (44 U.S.C. 3501 - 3520) (PRA) requires that a Federal agency obtain the approval of the Office of Management and Budget (OMB) before collecting information from the public, whether such collection of information is mandatory, voluntary, or required to obtain or retain a benefit. A Federal agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the collection of information displays a valid control number.

.02 Section 4.01(4)(a) of this revenue procedure provides that, where there are multiple manufacturers in an item of specified property's chain of production, the manufacturers may agree that a certain manufacturer will enter into an agreement with the IRS. This provision includes a recordkeeping requirement that the manufacturer entering into the agreement must retain a copy of the agreement in the manufacturer's books and records. This recordkeeping requirement is expected to be a usual and customary business practice that would impose no additional burden on respondents. Therefore, the recordkeeping requirement would not require OMB approval under 5 CFR 1320.3(b)(2).

.03 Sections 4, 6, and 7 of this revenue procedure mention third-party disclosure and reporting requirements that are necessary to ensure that specified property meets the requirements for the § 25C credit. In accordance with the Paperwork Reduction Act (44 U.S.C. 3507), these collections of information are included within the associated regulation and have been submitted to the Office of Management and Budget under OMB Control Number 1545-NEW under PRA procedures 5 CFR 1320.11.

## **SECTION 9. DRAFTING INFORMATION**

The principal author of this revenue procedure is the Office of Associate Chief Counsel (Passthroughs & Special Industries). However, other personnel from the Treasury Department and the IRS participated in its development. For further information regarding this revenue procedure, call the energy security guidance contact number at (202) 317-5254 (not a toll-free call).