



STUDIO  
ARIOTTO  
ASSOCIATI



Trusted Advisors



Local Knowledge



International Reach

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## About us

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Our firm is recognized for its knowledge of the energy practice with specific reference to tax and accounting matters.

Our expertise is based on many years of experience in the energy sector and includes tax energy services regarding renewable energy, energy communities, taxation issues of energy contracts (PPA, energy efficiency, energetic communities etc.).

Our team will be at your complete disposal to identify the best and most efficient tax solutions to find and do business in Italy, with experience both in direct taxation (income tax) and indirect taxation (VAT, registration tax).





## About us

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### Reasons to invest in Italy in renewables?

- Italy has a positive forecast of growth both for renewables and energy efficiency (80 GW of renewable energy within 2030)
- Due to the increase of energy cost during recent years, many companies are trying to render their business more independent from an energetic point of view
- In addition to saving of energy costs, with PV technology companies can significantly reduce emissions of polluting gases, thus generating an enormous benefit for the environment (in line with carbon neutrality public sensibility and political targets)
- Italy stands to benefit from new policies focused on renewable energy



## Our services

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We offer a wide range of services to multinational and Italian clients, helping in particular foreign investors to establish or expand their operations for project development.

We assist them also in extraordinary corporate transactions, mergers and acquisitions, spin off, company liquidations.

Our main services are:

- incorporation of companies, SPVs, branches and representative offices;
- accounting;
- payroll administration services;
- official financial statements and management reporting;
- filing of tax returns;
- tax advisory and tax planning;



- Tax due diligence
- Tax based public grants advisory;
- corporate reorganisation, mergers, sale and acquisition of companies or asset deals;
- cross border tax regulation;
- legal auditors' service.



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## Partners

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Alberto Capra Marzani  
Labour consultant

Graduated in Political Science and registered in the national list of “Labour Consultants”. He has developed a significant experience in the field of employment income (including labour law, social security issues, payroll administration and litigation).



Davide Ariotto  
Dottore Commercialista

Graduated in Economics and registered in the national list of Chartered Accountants. He is an expert in domestic and international tax law, and consultant for important Italian and multinational groups for tax issues and merger and acquisition transactions.



Valentina Triglia  
Accounting manager

She is specialized in integrated administrative services to companies with particular reference to accounting and reporting issues, including those of an extraordinary nature.





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## Our location

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## Tax support for building renovation and energy savings

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Italy benefits from policies focused to the renovation of real estate properties and to energy efficiency. They mainly consist in:

- interventions of extraordinary maintenance and renovation of buildings;
- implementation of works aimed at achieving energy savings with particular reference to the installation of systems based on the use of renewable energy sources. These works can be carried out even in the absence of building restoration works in the strict sense.

In general, the government bonus consists in a tax credit of 50% of the expenses incurred, within the limit of 96.000 € for every single real estate unit, to be spent over ten fiscal years.



## Tax support for PV and small storage equipment

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The costs of purchasing and building a photovoltaic system aimed at producing electricity are deductible pursuant to article 16-bis, paragraph 1, letter. h), of the TUIR (so-called renovation bonus), if the system itself is placed at the service of the residential property. The tax credit of 50% of the expenses incurred is foreseen also in the case of installation of an energy storage system.

The spending limit admitted for the deduction is currently € 96.000 as follows:

- installation of PV panels: the deduction is allowed up to a total amount of expenses not exceeding 48,000 €s and in any case within the spending limit of 2,400 €s for each kW of nominal power;
- simultaneous or subsequent installation of storage systems integrated into PV systems: the deduction is permitted up to a total amount of expenses not exceeding €48,000 and in any case within the spending limit of €1,000 for each kWh of storage capacity.

The bonus is recognised both in cases of new installation and in cases of retrofit to existing systems. In any case, the spending limit admitted to the deduction (currently 96,000 €) remains the same and concerns both the photovoltaic system and the storage system. If the purchase of the storage system is made in a tax period subsequent to that of purchase of the photovoltaic system, in order to reach the aforementioned spending limit, it will be necessary to take into account the expenses previously incurred for the photovoltaic system.







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## Tax support for PV and small storage equipment

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From a subjective point of view, this deduction is applicable exclusively to IRPEF subjects (natural persons, while holders of IRES business income (legal persons) are excluded.

To be noted that the tax deduction is granted also to condominiums, which assign the tax credit to its members.

However, the tax deduction for the photovoltaic system cannot be obtained if the transfer of excess electricity produced constitutes the exercise of a commercial activity (as in the case in which the system has a higher power to 20 kW) or if the system is not used in domestic properties.





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## Tax support for PV and small storage equipment

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In addition to other benefit granted to energetic communities by regulatory law, the tax credit 50% is recognized also in case of renewable source plants managed by energetic communities up to the threshold of 200kW and for a total expenditure amount not exceeding 96.000 €.

In this case, the tax credit 50% seems to be recognized also for expenses incurred by all tax payers, regardless of their legal nature (e.g. commercial companies), provided that the plant is at service of the energetic community (under way of confirmation by Tax Agency).

Particularly interesting is the relief for PV panels and the construction of PV plants which see VAT at 10% instead of 22%. This rate is applied not only to the cost of installing the traditional system, but also to that of the batteries (when opting for a photovoltaic system with storage).