

May 1, 2025

Potential Customer of SolarEdge and Enstall

**RE: Domestic Content Agreed-Upon Procedures performed for SolarEdge Technologies, Inc. and Enstall US, Inc.**

To Whom It May Concern:

### **Background on SolarEdge and Enstall Engagement with Novogradac**

Novogradac & Company LLP (“Novogradac,” “we,” “us” or “our”) entered into an engagement with SolarEdge Technologies, Inc. (“SolarEdge”) and Enstall US, Inc. (“Enstall”) on February 4, 2025 to provide certain Agreed Upon Procedure services in accordance with attestation standards established by the American Institute of Certified Public Accountants related to the Domestic Content ITC adder and more specifically to assist SolarEdge and Enstall in their combined determination of if certain Subject Matter listed in Exhibit A meets the New Elective Safe Harbor requirements as defined in Section 4 of IRS Notice 2024-41 and First Updated Elective Safe Harbor as defined in Section 5 of IRS Notice 2025-08 (the, “Subject Matter”).

We applied the agreed-upon procedures listed in the attached Exhibit A (the “Agreed-Upon Procedures”) to the SolarEdge and Enstall SKUs listed in Exhibit B. SolarEdge and Enstall are responsible for their respective portions of the Subject Matter and are the intended users of the agreed-upon procedures report. At the completion of our engagement, we issued a written report that lists the Agreed-Upon Procedures performed and our findings addressed to SolarEdge and Enstall.

### **Potential Engagement with SolarEdge and Enstall Customers and Novogradac**

If you are considering purchasing manufactured products from SolarEdge and Enstall that were subject to our Agreed-Upon Procedures, our initial report is limited to SolarEdge and Enstall as the Specified Users and may not be appropriate for your specific use or circumstances. If you choose to obtain a similar Agreed-Upon Procedures report related to the manufactured product that you are considering purchasing, Novogradac can offer to provide those services separately to you, to provide a deliverable in a manner relevant to you. At the completion of that engagement with you, we would issue a written report that lists the Agreed-Upon Procedures performed and our findings related to the product that you are considering for purchase.

### **Expected Fees**

Our fees to provide you with an Agreed-Upon Procedures report related to the SolarEdge and Enstall manufactured products that you are considering for purchase would start at \$5,000 for a single project. For an Agreed-Upon Procedures report with multiple named projects, the \$5,000 base fee would be increased by \$200 per project. Pricing related to a residential portfolio is subject to a distinct fee structure, which we are pleased to discuss on an individual basis.

### **Disclaimers**

This letter is provided for informational purposes only and should not be construed as professional advice concerning accounting, tax or other business-related matters, nor should it be utilized as a “comfort letter,” third party verification letter, or otherwise relied upon in assessing any reports or other services provided by Novogradac to

SolarEdge and Eninstall. No accountant-client relationship exists between Novogradac & Company LLP and a third party without a signed engagement letter to that effect. Accordingly, you should not rely on the contents of this letter in making financial, investment, other business decisions without consulting with your relevant professional advisors.

Agreed-Upon Procedures reports are deliverables governed by the AICPA Statement on Standards for Attestation Engagements and you are encouraged to consult with an applicable professional advisor and fully understand the scope and limitations of such a report prior to utilizing one.

This letter is not a contractual offer or agreement by Novogradac to provide professional services. Any specific engagement with Novogradac is subject to Novogradac's discretion as well as applicable AICPA standards including but not limited to those concerning conflicts of interest.

Novogradac is a licensed independence CPA firm and is not affiliated with SolarEdge nor Eninstall or otherwise engaged in a partnership, joint venture or other financial relationship. Any professional services provided by Novogradac to SolarEdge and Eninstall are governed by an applicable engagement letter.

\* \* \*

We look forward to discussing any questions you may have and please do not hesitate to let us know if you would like additional information on this potential engagement or any other potential services that Novogradac can provide (see Exhibit C for additional Novogradac services offered to the Renewable Energy industry).

Very truly yours,  
NOVOGRADAC & COMPANY LLP

by:   
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**EXHIBIT A**  
**Description of Subject Matter and Agreed Upon Procedures**

Subject Matter

In a manner consistent with section 4 of IRS Notice 2024-41 and IRS Notice 2025-08, we obtained from management of SolarEdge and Enstall detailed descriptions of the Companies' Applicable Project Components ("APCs") that it manufactures and the associated Manufactured Product Components ("MPCs") of the APCs (the "Safe Harbor Schedules"). The Safe Harbor Schedule details the MPCs, as identified by Table 1 of section 4.01(1)-(3) of Notice 2024-41 and the Updated Table for Solar PV Rooftop of Section 5.06 of Notice 2025-08, that are manufactured in the United States. The Safe Harbor Schedules detail the structural steel and iron APCs, as identified by Table 1 of section 4.01(1)-(3) of Notice 2024-41 and the Updated Table for Solar PV Rooftop of Section 5.06 of Notice 2025-08, that are manufactured in the United States.

Domestic Content - Agreed Upon Procedures

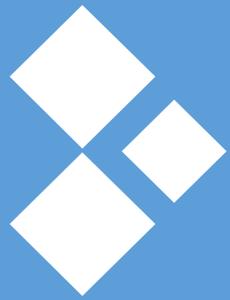
1. We recalculated the Domestic Cost Percentage for purposes of the New Elective Safe Harbor for SolarEdge and Enstall's APC and MPCs.
2. We recalculated the Domestic cost Percentage for purposes of the First Updated Elective Safe Harbor for SolarEdge and Enstall's APC and MPCs.
3. We conducted interviews with key personnel involved in the SolarEdge Inverter and Enstall Racking product production, manufacturing, and compliance reporting/tracking of the APCs and MPCs to obtain an understanding of the manufacturing process for the APCs and MPCs.
4. For the SolarEdge and Enstall MPCs manufactured in the United States, we obtained and inspected available evidence supporting the origin of the MPCs to one or more of third-party vendor statements, third-party vendor communications, purchase orders, bills of lading, and/or third-party vendor confirmations.
5. For the structural steel and iron APCs, we obtained a representation from management of Enstall that all construction materials incorporated in their Racking APC made primarily of steel or iron that are structural in function had all manufacturing processes take place in the United States.
6. For the structural steel and iron APCs, we obtained a supporting evidence, such as certifications, confirmations, mill certifications, Buy America certifications, and/or documentation of supply chain tracing from Enstall that all construction materials incorporated in their Racking APC made primarily of steel or iron that are structural in function were manufactured in the United States.

**EXHIBIT B**  
**SolarEdge Technologies, Inc. & Enstall US, Inc.**  
**Schedule of SKUs**

<u>Company</u>	<u>SKUS</u>	<u>Description</u>	<u>Product Line</u>
<b>SolarEdge Technologies, Inc.:</b>	USE-SIN-USR0IBNS6	Inverter	C&I Optimized Inverter System
	USESUK-USR0INNN6	Inverter	C&I Optimized Inverter System
	USE-SIN-USR0IBNS8	Inverter	C&I Optimized Inverter System
	USESUK-USR0INNN8	Inverter	C&I Optimized Inverter System
	C651U-1GMVMRRU	Optimizer	C&I Optimized Inverter System
<b>Enstall US, Inc.:</b>	BX-5D-P1	Rail	IronRidge BX Non-Steel Racking
	BX-10D-P1	Rail	IronRidge BX Non-Steel Racking
	BX-BCL-M1	Fastener	IronRidge BX Non-Steel Racking
	BX-TCL-30MM-M1	Fastener	IronRidge BX Non-Steel Racking
	BX-TCL-32MM-M1	Fastener	IronRidge BX Non-Steel Racking
	BX-TCL-35MM-M1	Fastener	IronRidge BX Non-Steel Racking
	BX-TCL-40MM-M1	Fastener	IronRidge BX Non-Steel Racking
	2000905	Rails	PanelClaw clawFR Non-Steel Roof Racking
	2000910	Rails	PanelClaw clawFR Non-Steel Roof Racking
	2000905	Rails	PanelClaw clawFRplus Non-Steel Roof Racking
	2000910	Rails	PanelClaw clawFRplus Non-Steel Roof Racking
	2000673	Fasteners	PanelClaw clawFR Non-Steel Roof Racking
	2000854	Fasteners	PanelClaw clawFRplus Non-Steel Roof Racking

EXHIBIT C

NOVOGRADAC SERVICES OFFERED TO THE RENEWABLE ENERGY INDUSTRY



NOVOGRADAC

Renewable Energy Services

# ENVIRONMENTAL AND CLEANTECH INFRASTRUCTURE

## KNOWLEDGE TO GUIDE INVESTORS, DEVELOPERS IN RENEWABLE ENERGY TAX EQUITY FINANCED TRANSACTIONS

Novogradac's environmental and cleantech infrastructure practice meets the demand of institutional tax credit investors looking to diversify their investment portfolios with financially viable and environmentally responsible investments. Novogradac served some of the earliest movers in the solar energy market as these renewable energy development companies recognized the value Novogradac brought to the table as experts in tax equity financed investments—and continues to do so. As a long-established service provider to developers and investors involved in tax credit financed developments, Novogradac has a comprehensive understanding of the underlying tax, accounting and structuring issues that arise in financing successful renewable energy transactions.

## COMPREHENSIVE SERVICES FOR SPONSORS AND INVESTORS

### PROJECT FINANCE/TRANSACTION ADVISORY

- Transaction structure advisory
- Financial projection preparation
  - Tax basis
  - GAAP basis
- Project finance support/advisor
- Evaluation of tax equity investments
- Evaluation of sponsor equity and debt (including construction and permanent debt and/or back-loaned)
- M&A advisory/Sponsor interest
- Tax equity investor, lender and introductions
- Transaction support services
- "Begin construction" sale hardening
- Accounting, financial and tax due diligence
- Quality of earnings analysis
- Hypothetical liquidation at bootstrapped investor
- Other related general consulting

### TAX EQUITY INVESTOR SERVICES

- Evaluation of financial projection perspective
- Evaluation of investor GAAP basis
- Hypothetical liquidation at bootstrapped investor
- Calculation of noncontrolling interest



Image: Courtesy of Kathryn Crockett, White Oak Pastures. Since 2010, regenerative ranching practices from White Oak Pastures in Bufton, Georgia, help to restore up to 2,000 sheep at Suncoast Solar Farm to restore the land to a functioning grassland ecosystem.



# ENVIRONMENTAL AND CLEANTECH INFRASTRUCTURE

Expert project finance, transaction advisory, tax and accounting services related to the development and financing of renewable energy projects encompassing a wide array of competing technologies.

KNOWLEDGE ♦ EXPERIENCE ♦ SERVICE

**Expert project finance, transaction advisory, tax and accounting services related to the development and financing of renewable energy projects encompassing a wide array of competing technologies.**

**Knowledge to guide sponsors, tax equity investors and lenders in renewable energy tax equity financed transactions**

Novogradac's environmental and cleantech infrastructure practice meets the demand of tax credit investors looking to diversify their investment portfolios with financially viable and environmentally responsible investments. Novogradac served some of the earliest participants in the renewable energy market as these companies recognized the value we brought to the table as experts in tax equity financed investments—and we continue to do so. As a long-established service provider to developers and investors involved in tax credit financed developments, Novogradac exhibits a comprehensive understanding of the underlying tax, accounting, business and structuring issues that arise in financing successful renewable energy transactions. In our role as trusted business advisors we provide clients with services based on innovative thinking, industry expertise, entrepreneurial acumen and superior client service.

Novogradac's work in the renewable energy industry is primarily focused on projects financed with the investment tax credit (ITC) and the production tax credit (PTC), for which we provide project finance, tax equity transaction advisory, tax, accounting and auditing services to renewable energy developers (sponsors) and investors. As a firm, we have assisted with thousands of RETC transactions and have been involved in upwards of at least several billion in tax credit financings per year.

# ENVIRONMENTAL AND CLEANTECH INFRASTRUCTURE

## Comprehensive Services for Developers, Sponsors and Investors

### Project Finance/Transaction Advisory

- Transaction structure advisory
- Financial projection preparation and compilation services
  - Tax basis
  - GAAP basis
- Project finance support/advisory
- Evaluation of tax equity investor term sheets
- Evaluation of sponsor equity and debt term sheets
- Construction and permanent debt advisory (project level and/or back-levered)
- M&A advisory/Sponsor interest monetization advisory
- Tax equity investor, lender and cash equity investor introductions
- Transaction support services
- “Begun construction” safe harbor advisory services
- Accounting, Financial and Tax Due diligence
- Quality of earnings analysis
- Hypothetical liquidation at book value (HLBV) analysis for Sponsor
- Domestic Content Agreed Upon Procedure due diligence services
- Prevailing Wage and Apprenticeship Agreed Upon Procedure due diligence services
- Section 6418 Tax Credit Transfer consulting services
- Other related general consulting as requested

### Tax Equity Investor Services

- Evaluation of financial projections from investor perspective
- Evaluation of investor GAAP earnings profile
- Hypothetical liquidation at book value (HLBV) analysis for Investor
- Calculation of noncontrolling interest-sponsor/developer
- Investor internal rate of return (IRR) analysis
- Investor return on investment (ROI) analysis
- Call option pricing analysis
- Asset management support schedules
- Relationship liaison for transaction participants
- Specialized professional development training services
- Due diligence services
- Property tax projections
- Real property transfer tax advisory
- Property tax exemption and incentives advisory
- Sales tax exemption and incentives advisory

### Accounting and Tax Services

- Financial statement audits, compilations and reviews
- Tax return preparation
- Financial projection preparation – with accompanying Accountants’ compilation report
- Project cost segregation analysis and cost segregation report
- Various Agreed-Upon Procedure Reports

# ENVIRONMENTAL AND CLEANTECH INFRASTRUCTURE VALUATION SERVICES

## KNOWLEDGE TO UNDERSTAND THE INFLUENCES THAT AFFECT RENEWABLE ENERGY VALUES

Novogradac & Company LLP's valuation advisory services span an array of market- and value-related issues across project types—including solar, wind, biomass, fuel cell and other emerging renewable energy technologies. Our highly skilled valuation professionals come from a variety of backgrounds including development, asset management, consulting, planning, valuation and banking. This creates a broad base of knowledge and helps our valuation (GO) professionals understand the influences that affect renewable energy values.

Novogradac can prepare fair market valuations for wind, biomass, fuel cell and other emerging renewable energy projects in connection with clients' financing, investment and exit analysis. Clients, lenders, investors and other stakeholders

## EXPERIENCE IN PROVIDING VALUATION SERVICES AT VARIOUS POINTS OF THE PROJECT LIFECYCLE

Novogradac & Company LLP has completed numerous assignments for clients at various points of the project lifecycle, including appraisal and feasibility studies, investment analysis and exit analysis. Our valuation services are designed to provide clients with crucial information throughout the investment horizon. Billing and analysis purposes is a common use of accountants and valuation services.

## VALUATION SERVICES

- Fair market valuation services
- valuations of systems and assets
- valuations of systems and assets

## NOVOGRADAC'S RENEWABLE ENERGY TAX CREDIT VALUATION SPECIALIST

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then use the valuation reports to evaluate certain tax consequences that apply to owners. The valuations are also commonly used by owners contemplating exiting deals. Valuations at differing points in the development process are also prepared with values as of the placed-in-service date, completion or future dates of values. The valuations typically rely on both the cost



Image: Courtesy of Sean Fountain, Summit Ridge Energy Project Clinton 4 in Illinois is a 2.9 MW community solar facility that went online in October 2020.



# RENEWABLE ENERGY VALUATION

Broad experience with complex tax, accounting, business and transactional issues related to financing and developing renewable energy tax credit projects.

KNOWLEDGE ♦ EXPERIENCE ♦ SERVICE

- Fair Market Valuations for:
  - Solar
  - Wind
  - Biomass
  - Fuel cells
  - Geothermal
  - Other
- Energy valuations for underwriting processes
- Fair market valuations services for application, lending and investment purposes
- Leased fee and leasehold valuations (at various future dates) for deal structuring purposes
- Put and call valuations for deal structuring purposes
- Reversion calculations for investors
- Purchase price allocations for GAAP and tax purposes
- Reasonableness analyses related to testing related-party fees
- Partnership interest/membership interest valuations
- Business valuations