

Ashley Seah

Associate

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OVERVIEW

Ashley Seah is admitted to practice in New York. She is not currently admitted to practice in the District of Columbia. She is supervised by a member of the DC Bar.

Ashley Seah is a Corporate associate in the firm's Tax practice group, advising clients on federal tax matters with a particular focus on renewable energy and other energy transition transactions. Her practice combines transactional tax work with substantive tax advisory services, including the structuring, financing, merger and acquisition, development, and monetization of renewable energy projects and the qualification, optimization, and transferability of federal tax credits and incentives.

Ashley advises sponsors, developers, investors, financial institutions, utilities, manufacturers, and other market participants on transactions involving renewable energy and energy transition assets. She also advises clients on a broad range of federal tax credits and incentives, including investment tax credits (ITCs), production tax credits (PTCs), and incentives for carbon capture, clean hydrogen, nuclear energy, energy efficiency, and advanced manufacturing.

Ashley has advised clients on opportunities and requirements arising from the Inflation Reduction Act and the One Big Beautiful Bill Act, including bonus credits, newly enacted tax credits, and changes affecting the eligibility and transferability of federal energy tax credits. Her experience includes advising clients on the prohibited foreign entity (PFE) restrictions and related material assistance, ownership, and control requirements introduced and expanded by subsequent legislation.

PROFESSIONAL BACKGROUND

Prior to joining the firm, Ashley worked at a global professional services and accounting firm as a Tax Manager in the Washington National Tax Credits & Incentives practice, where she focused on renewable energy and other federal tax credits and incentives. She advised Fortune 500 companies, financial institutions, utilities, manufacturers, renewable energy developers, and independent power producers.

Previously, Ashley advised clients on international tax and transfer pricing matters at a global professional services and accounting network in Malaysia. Her experience included transfer pricing documentation,

benchmarking, tax audits, and other international tax matters. She has worked with clients and teams across the United States, United Kingdom, Singapore, Malaysia, and Indonesia.

EDUCATION

- LL.M, New York University School of Law, 2022
- LL.M, Peking University, 2020
- LL.B., London School of Economics, 2018

ADMISSIONS

- Admitted only as indicated below. Not admitted in the District of Columbia. Supervised by a member of the D.C. Bar.
- Bar of New York

LANGUAGES

- Malay
- English

AREAS OF FOCUS

- Tax
- Energy Assets and Transactions

INDUSTRIES

- Carbon Solutions
- Energy
- Hydrogen
- Nuclear Energy
- Renewables