

Peter W. Rogers

Partner

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Peter Rogers advises clients on tax matters in mergers and acquisitions, spin-offs, reorganizations, joint ventures, renewable energy investments, securities offerings and bank financings. He has experience across a range of industries, including energy, infrastructure, finance, technology, media and entertainment, consumer products and telecommunications.

Prior to his legal career, Peter was a senior associate at PricewaterhouseCoopers LLP.

Industries

[Energy](#)

[Finance](#)

[Infrastructure](#)

[Technology](#)

Practices

[Tax](#)

[Corporate & Securities](#)

[Capital Markets](#)

[Mergers & Acquisitions](#)

[Finance](#)

[Private Equity](#)

[Renewable Energy](#)

Experience

Stonepeak

- \$3 billion acquisition of a 50 percent interest in the Coastal Virginia Offshore Wind project, the largest US offshore wind project*

Crestwood Equity Partners

- \$7.1 billion acquisition by Energy Transfer*

Denbury

- \$4.9 billion acquisition by ExxonMobil*

Reata Pharmaceuticals

- \$7.3 billion acquisition by Biogen*

BRACEWELL

Enbridge

- joint venture merger with Phillips 66 resulting in a single joint venture holding Gray Oak Pipeline and DCP Midstream*

Oasis Petroleum

- \$6 billion merger of equals with Whiting Petroleum, creating Chord Energy*

The Sinclair Companies

- combination of Sinclair Oil with HollyFrontier and Holly Energy Partners*

J.D. Power

- acquisition by Thoma Bravo*

DiaSorin

- \$1.8 billion acquisition of Luminex*

Cable One

- acquisitions of Hargray Communications and Fidelity Communications*

Scientific Games

- carve-out IPO of SciPlay utilizing an Up-C structure*

Disney

- \$85 billion acquisition of 21st Century Fox*

British American Tobacco

- \$97 billion merger with Reynolds, including in its \$17.25 billion notes offering (the largest-ever European notes offering)*

Ashland

- tax-free spin-off of Valvoline*

IBM

- acquisitions and dispositions of businesses throughout the world*

Credit Suisse, Goldman Sachs and J.P. Morgan

- as administrative agents and underwriters for credit facilities and securities offerings*

European Investment Bank

- as the issuer in notes offerings*

**Work completed prior to Bracewell*

Credentials

Education

- Northwestern University School of Law, J.D., 2014, *magna cum laude*, *Order of the Coif*
- Babson College, M.S., Accounting, 2008, *summa cum laude*, *Valedictorian*
- Babson College, B.S., Business Administration, 2008, *summa cum laude*, *Valedictorian*

Bar Admissions

- Texas
- New York
- New Jersey

Affiliations

- Dallas Bar Association, Tax Section, Member

Recognition

BL Rankings

- *Best Lawyers*, Ones to Watch, Tax Law, 2023-2025

Northwestern University School of Law

- *Northwestern University Law Review*, Online Executive Editor

US District Court for the Southern District of New York

- The Honorable William H. Pauley III, Judicial Intern

American Institute of CPAs

- Elijah Watt Sells Award, 2009 (awarded to top 15 of 93,000 examinees on national CPA exam)

Babson College

- Roger W. Babson Award, 2008 (highest honor bestowed upon one graduate for scholarship and leadership)

Resources

Treasury and IRS Issue Final and Proposed Regulations Expanding Applicable Entities' Ability to Elect Direct Pay in Connection With Credit Property Owned Indirectly Through an Unincorporated Organization

Update

Treasury Department and IRS Release Final Regulations for Section 45V Clean Hydrogen Production Tax Credit

Update

Publications & Speeches

- “The Inflation Reduction Act: Implementation Lessons Learned and Expectations for Tech-Neutral Credits (Sections 48, 45V and 45Z),” RNG Summit 2024, May 7, 2024.
- “Who Gets the Jewels When a Law Firm Dissolves? The Unfinished Business Doctrine and Hourly Matters,” 108 Nw. U. L. Rev. 311 (2014).