

Agenzia Delle Entrate Albano

Emilie Sanchez

Il consolidato fiscale Enzo Rocca, Fabrizio Sala, 2015-04-28 Tra i modelli organizzativi di cui si avvale l'imprenditore nell'esercizio della propria attività economica, il "gruppo di imprese" risulta essere particolarmente diffuso nell'attuale economia di mercato. La tassazione dei gruppi societari, secondo il metodo del consolidamento degli imponibili fiscali, prevede che la società capogruppo presenti un'unica dichiarazione, contenente la somma algebrica dell'imponibile proprio e di quelli delle società controllate, opportunamente rettificati. Nel presente volume si fornisce una puntuale disamina dei principi generali dell'istituto quali la definizione dell'area di consolidamento fiscale, il meccanismo di formazione della base imponibile, l'utilizzo e il riporto delle perdite fiscali, le rettifiche di consolidamento, le svalutazioni delle partecipazioni, l'interruzione della tassazione di gruppo ed il mancato rinnovo dell'opzione e i profili di responsabilità. In particolare, nella IV edizione, viene ulteriormente sviluppata la tematica della deduzione dell'agevolazione ACE (Aiuto alla Crescita Economica, di cui all'art. 1 del D.L. n. 201/2011) alla luce della circolare n. 12/e del 23 maggio 2014. Vengono presentati anche i chiarimenti relativi all'accertamento nel caso di contestazione sulla validità dell'esercizio dell'opzione per la tassazione di gruppo che "travolga" l'intera fiscal unit, illustrati nella circolare n. 31/e del 2013.

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Energia Fiscalità Incentivi Agevolazioni Bonardi Giancarlo, Patrignani Carlo, 2013-05-02 Il mondo dell'energia è in continua evoluzione non solo dal punto di vista tecnologico, ma anche da quello ambientale, contabile, fiscale e agevolativo.

Nel libro vengono trattati i principali temi di attualità fiscale nel settore dell'energia, con particolare attenzione alle recenti novità che hanno radicalmente modificato lo scenario in cui si muovono gli operatori, e in particolare: - il decreto sviluppo, - la circolare agenzia delle dogane sulle accise, - il nuovo principio contabile sui titoli ambientali, - il quinto conto energia e gli incentivi per le fonti rinnovabili diverse dal fotovoltaico, - le recenti sentenze sul tolling e sulla rendita catastale degli impianti eolici, - le disposizioni sulla cogenerazione di energia e calore, - la circolare sulle svalutazioni ai fini IRAP, - la trasformazione del credito per imposte anticipate, - gli interventi sull'IVA e il risparmio energetico nel settore dell'edilizia. Lo scopo del libro è quello di far conoscere agli operatori le novità fiscali intervenute negli ultimi mesi, affinché sappiano gestire i rischi/opportunità legati ai cambiamenti normativi. STRUTTURA - SEZIONE I - BILANCIO E REDDITO D'IMPRESA - I nuovi principi contabili sui titoli ambientali - La trasformazione delle imposte anticipate in crediti di imposta nel settore energetico - La deducibilità IRAP delle svalutazioni - La Robin Tax e un focus sul caso della separazione delle reti - La valutazione al fair value dei contratti di compravendita di commodity energetiche: aspetti contabili e fiscali - SEZIONE II - ENERGIA RINNOVABILE - I nuovi incentivi per il fotovoltaico - Il leasing e gli impianti fotovoltaici - Gli adempimenti degli impianti fotovoltaici ai fini dell'accisa - Gli incentivi per le fonti rinnovabili diverse dal fotovoltaico - Imposizione IMU e impianti eolici - SEZIONE III - EDILIZIA - Le novità in materia di agevolazioni per l'efficienza dei fabbricati - L'IVA nell'edilizia - SEZIONE IV - ENERGIA CONVENZIONALE - Il regime Iva dei "certificati verdi" nel "particolare" contesto del contratto di tolling - Il contratto di tolling nel sistema di tassazione IVA e delle accise - Le accise nella produzione di energia elettrica e calore - La tassazione ambientale tra limiti costituzionali ed esigenze comunitarie - La produzione dell'energia tra tributi ambientali e agevolazioni fiscali - Breve esame delle scelte tributarie italiane per favorire le produzioni energetiche di minor impatto ambientale - L'acquisto di energia elettrica e gas naturale in punti diversi dal contatore: profili IVA e accise

La Transazione fiscale Giulio Andreani, Angelo Tubelli, 2024-11-12 Una guida per tutti coloro che hanno la necessità di elaborare - o di esaminare - una proposta di transazione fiscale. Vengono analizzate in modo completo e approfondito le norme che disciplinano questo istituto, tenendo conto degli orientamenti espressi dalla giurisprudenza e dalla dottrina, nonché dei chiarimenti dell'Amministrazione finanziaria, ma soprattutto cercando di indicare un percorso per i casi privi di una soluzione già sperimentata, mettendo a beneficio del lettore l'esperienza maturata nei numerosi e complessi procedimenti curati professionalmente dagli Autori. L'istituto della transazione fiscale è stato introdotto nell'ordinamento allo scopo di consentire un accordo tra l'Amministrazione finanziaria e le imprese che versano in uno stato di crisi, con un duplice fine: quello di assicurare alle agenzie fiscali un soddisfacimento migliore di quello consentito dalle alternative possibili e, allo stesso tempo, di scongiurare la disgregazione dell'impresa debitrice, quando questa dimostri di avere la capacità di riacquisire e conservare nel tempo il proprio equilibrio economico-finanziario e patrimoniale, generando utilità future.

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Fiscalità internazionale Pierpaolo Angelucci, Paolo Scarioni, Tommaso Angelini, Giuseppe Ascoli, Eugenio Della Valle, Carlo Ferranti, Giancarlo Ferranti, Stefano Forcina, Andrea Gallizioli, Sergio Marchese, Fiorentino Martino Antonio, Luca Miele, Massimo Pellecchia, Raimondo Rossi, Stefano Schiavello, 2024-04-22 FISCALITA' INTERNAZIONALE della nuova collana Riforma fiscale esamina le modifiche introdotte, a partire dal 2024, in materia di fiscalità internazionale dal D.Lgs. n. 209/2023 e le numerose problematiche interpretative che si pongono per gli operatori interessati su: nuovi criteri di residenza delle persone fisiche, delle società e degli enti non societari riforma del regime degli impatriati revisione del criterio di calcolo del tax rate del controllato estere nel regime CFC nuova agevolazione per il reshoring in Italia di attività economiche provenienti da Paesi non appartenenti alla UE e allo SEE, che dovrà essere autorizzata dalla Commissione UE previsione quadro per la concessione a imprese e professionisti degli incentivi fiscali aventi natura di aiuti di Stato disapplicazione delle sanzioni in presenza della idonea documentazione per i disallineamenti da ibridi recepimento della direttiva UE sulla global minimum tax, avente ad oggetto la definizione di un livello di imposizione fiscale minimo globale per i gruppi multinazionali

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