

Republic of the Philippines
COURT OF TAX APPEALS
Quezon City

En Banc

**VICTORIA MANUFACTURING
CORPORATION,**

Petitioner,

- versus -

**COMMISSIONER OF INTERNAL
REVENUE,**

Respondent.

EB Case No. 1094
(CTA Case No. 8187)

Present:

DEL ROSARIO, PJ,
CASTAÑEDA, JR.,
BAUTISTA,
UY,
CASANOVA,
FABON-VICTORINO,
MINDARO-GRULLA,
COTANGCO-MANALASTAS, and
RINGPIS-LIBAN, J.J.

Promulgated:

MAR 30 2015

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RESOLUTION

CASANOVA, J.:

Submitted for resolution before Us is petitioner's Motion for Reconsideration filed thru registered mail on December 10, 2014, without respondent's comment per Records Verification dated March 3, 2015.

Petitioner's Motion seeks reconsideration of this Court's Decision, promulgated on November 12, 2014, the dispositive portion of which reads:

"WHEREFORE, premises considered, the instant Petition for Review is hereby **DENIED** for lack of merit.

SO ORDERED."

Petitioner anchors its Motion on the following grounds:

1. Petitioner's Superintendence Expense in the amount of P2,414,051.00 is not taxable income of petitioner.
2. The Meralco refund in the amount of P1,874,408.00 is not taxable income of petitioner.
3. Petitioner's Superintendence Expense in the amount of P2,414,051.00 is not subject to Expanded Withholding Tax.

We have carefully perused the grounds and arguments proffered by petitioner in its Motion for Reconsideration and finds no valid or compelling reason to grant the same. The Motion does not raise any new, cogent or substantial ground to warrant reconsideration of this Court's Decision dated November 12, 2014.

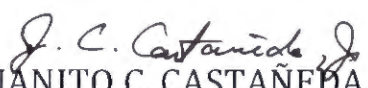
WHEREFORE, petitioner's Motion for Reconsideration is hereby **DENIED** for lack of merit.

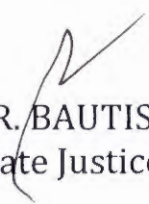
SO ORDERED.


CAESAR A. CASANOVA
Associate Justice

WE CONCUR:


ROMAN G. DEL ROSARIO
Presiding Justice

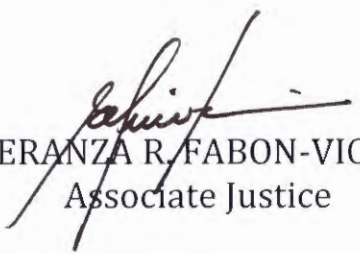

JUANITO C. CASTAÑEDA, JR.
Associate Justice



LOVELL R. BAUTISTA
Associate Justice

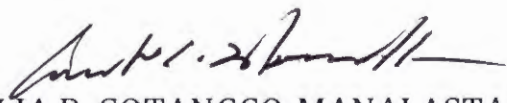


ERLINDA P. UY
Associate Justice

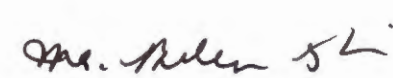


ESPERANZA R. FABON-VICTORINO
Associate Justice

(On Leave)
CIELITO N. MINDARO-GRULLA
Associate Justice



AMELIA R. COTANGCO-MANALASTAS
Associate Justice



MA. BELEN M. RINGPIS-LIBAN
Associate Justice