► See separate instructions.

## Part I Reporting Issuer

1	Issuer's name				2 Issuer's employer identification number (EIN)
Tor	toise Power and Energ	y Infrastructure Fun			
3	Name of contact for add	ditional information	4 Telephor	ne No. of contact	5 Email address of contact
					taxinfo@tortoiseecofin.com
6	Number and street (or F	P.O. box if mail is not	delivered to s	street address) of contact	7 City, town, or post office, state, and ZIP code of contact
	1 College Boulevard, S	uite 400	Overland Park, KS 66211		
8	Date of action		9 Clas	sification and description	
	20/2024	44 Orniel work or	Commo		
10	CUSIP number	11 Serial number(	S)	12 Ticker symbol	13 Account number(s)
	89147X104			TD7	
Pa		nal Action Atta	ch additional	TPZ statements if needed	See back of form for additional questions.
14	-				late against which shareholders' ownership is measured for
••	the action ► See atta				
15	Describe the quantitat share or as a percenta				urity in the hands of a U.S. taxpayer as an adjustment per
16	Describe the calculation valuation dates ► Sec		asis and the c	lata that supports the calc	ulation, such as the market values of securities and the

Firm's address ►

							8
Part		Organizational Action (continued)					
<b>17</b> L	ist the	applicable Internal Revenue Code section(s	) and subsection(s) upon which the tax treat	atment	is based ►	IRC Section	on 368(a)
					lo baccu r		
18 ( reorga		y resulting loss be recognized?► No lose	s can be recognized by the shareholders	of rec	ord on 12/2	20/2024 in the	nontaxable
<b>19</b> F	Provide	any other information necessary to implem	ent the adjustment, such as the reportable	tax ye	ar <b>⊳ <mark>Not ap</mark></b>	plicable	
	Unde	r penalties of perjury, I declare that I have exami , it is true, correct, and complete. Decla <u>ration of p</u>	ned this return, including accompanying schedu reparer (other than officer) is based on all informa	les and ation of	statements,	and to the best	of my knowledge and
Sign	20110				innen propur		iougo:
Here	0.	111					
	Sign	ature		Date►	Jan. 10, 2	025	
	Print	your name Matthew GP. Sallee		Title►	CEO		
Daid	1	Print/Type preparer's name	Preparer's signature	Date		Check $O$ if	PTIN
Paid Prep	aror					self-employed	
Use		Firm's name				Firm's EIN ►	•
	y					Di	

Send Form 8937 (including accompanying statements) to: Department of the Treasury, Internal Revenue Service, Ogden, UT 84201-0054

Phone no.

Tortoise Power and Energy Infrastructure Fund

Attachment to Form 8937

14. Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action

On December 20, 2024, at 5pm, Tortoise Power and Energy Infrastructure Fund, Inc., which is a closed end fund ("CEF"), merged into Tortoise Power and Energy Infrastructure Fund, which is an exchange traded fund ("ETF") in a nontaxable reorganization under Section 368(a) of the Internal Revenue Code of 1986, as amended ("IRC"). As a result of the merger, shareholders of the CEF exchanged each of their shares of CEF for 1 share of the ETF.

On December 20, 2024, at 8pm, Tortoise Energy Independence Fund, Inc. merged into the ETF in a nontaxable reorganization under Section 368(a) of the IRC. As a result of this merger, shareholders of Tortoise Energy Independence Fund, Inc. exchanged each of their shares of Tortoise Energy Independence Fund, Inc. exchanged each of their shares of Tortoise Energy Independence Fund, Inc. for 2.04519311 shares of the ETF.

On December 20, 2024, at 8pm, Tortoise Pipeline & Energy Fund, Inc. merged into the ETF in a nontaxable reorganization under Section 368(a) of the IRC. As a result of this merger, shareholders of Tortoise Pipeline & Energy Fund, Inc. exchanged each of their shares of Tortoise Pipeline & Energy Fund, Inc. for 2.40891304 shares of the ETF.

**15.** Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis

Shareholders of the CEF received 1 share of the ETF for every share of the CEF exchanged in a nontaxable reorganization. The total cost basis of the shareholders of the CEF remained the same after such reorganization. The per share cost basis of the shareholders of the CEF in their newly acquired ETF shares after the associated merger is equal to their previous per share cost basis in shares of the CEF prior to the associated merger divided by 1. The holding period of the shareholders of the CEF in their new shares of the ETF remained the same as it was prior to the associated merger.

Shareholders of Tortoise Energy Independence Fund, Inc. received 2.04519311 shares of the ETF for every share of Tortoise Energy Independence Fund, Inc. exchanged in a nontaxable reorganization. The total cost basis of the shareholders of Tortoise Energy Independence Fund, Inc. remained the same after such reorganization. The per share cost basis of shareholders of Tortoise Energy Independence Fund, Inc. in their newly acquired ETF shares after the associated merger is equal to their previous per share cost basis in shares of Tortoise Energy Independence Fund, Inc. prior to the associated merger divided by 2.04519311. The holding period of the shareholders of Tortoise Energy Independence Fund, Inc. in their new shares of the ETF remained the same as it was prior to the associated merger.

Shareholders of Tortoise Pipeline & Energy Fund, Inc. received 2.40891304 shares of the ETF for every share of Tortoise Pipeline & Energy Fund, Inc. exchanged in a nontaxable reorganization. The

total cost basis of the shareholders of Tortoise Pipeline & Energy Fund, Inc. remained the same after such reorganization. The per share cost basis of shareholders of Tortoise Pipeline & Energy Fund, Inc. in their newly acquired ETF shares after the associated merger is equal to their previous per share cost basis in shares of Tortoise Pipeline & Energy Fund, Inc. prior to the associated merger divided by 2.40891304. The holding period of the shareholders of Tortoise Pipeline & Energy Fund, Inc. in their new shares of the ETF remained the same as it was prior to the associated merger.

16. Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates

The nontaxable reorganizations – (i) merger of the CEF into the ETF, (ii) merger of Tortoise Energy Independence Fund, Inc. into the ETF, (iii) merger of Tortoise Pipeline & Energy Fund, Inc. into the ETF – on 12/20/2024 results in no change to each applicable shareholder's overall total cost basis in accordance with IRC Section 368(a). The per share cost basis of the shareholders of CEF in their newly acquired shares of the ETF after the associated merger is equal to their previous share basis of the CEF prior to the associated merger divided by 1. The per share cost basis of the shareholders of Tortoise Energy Independence Fund, Inc. in their newly acquired shares of the ETF after the associated merger is equal to their previous share basis of Tortoise Energy Independence Fund, Inc. prior to the associated merger divided by 2.04519311. The per share cost basis of the shareholders of Tortoise Pipeline & Energy Fund, Inc. in their newly acquired shares of the ETF after the merger is equal to their previous share basis of Tortoise Energy Independence Fund, Inc. prior to the associated merger divided by 2.04519311. The per share cost basis of the shareholders of Tortoise Pipeline & Energy Fund, Inc. in their newly acquired shares of the ETF after the merger is equal to their previous share basis of the Tortoise Pipeline & Energy Fund, Inc. prior to the associated merger divided by 2.40891304.