# UNDERSTANDING VALIDATING REGULATORY DEFERRED **TAXES**

Best practices for utility tax professionals



# **ON TODAY'S WEBINAR**

Why do we care about ADIT?

How do we make sure your ADIT is correct?

How do you make sure your ADIT stays correct?





ad·it NOUN ['adət]

A horizontal passage leading into a mine for the purposes of access or drainage.



# Accumulated Deferred Income Taxes (ADIT) NOUN

"The tax effect of temporary differences created when an item has been treated differently for financial reporting purposes and for tax purposes in the same period, which are expected to reverse in a future period and create a tax consequence."

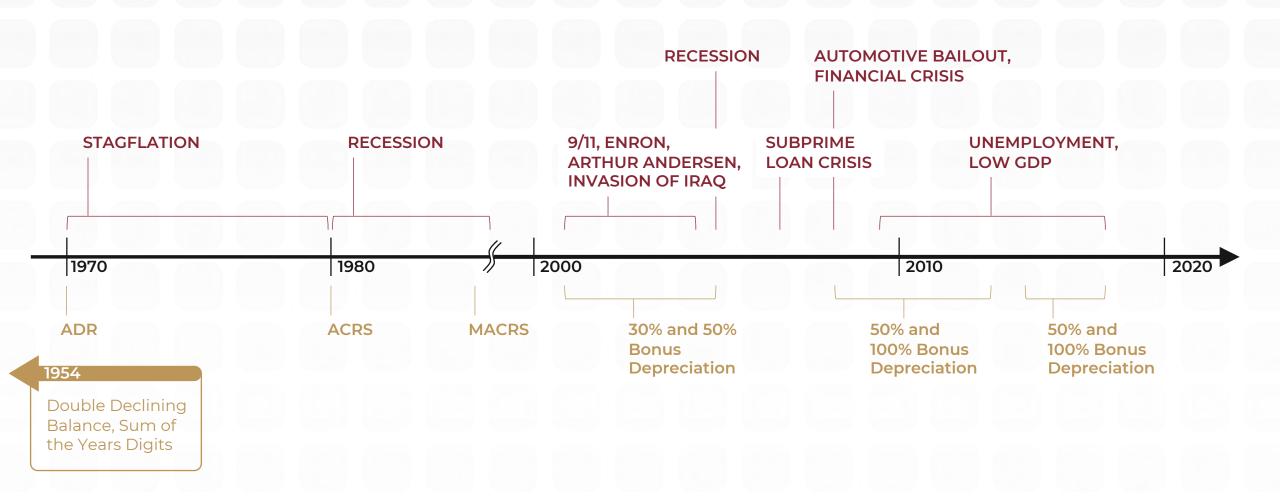
# Alternate Ratemaking Formula

A	В	С	D	(E=C*D)
CLASS OF CAPITAL	AMOUNT	PERCENT OF TOTAL	COST RATE	WEIGHTED COST
Short-Term Debt	3,114,231	0.92%	2.50%	0.023%
Long-Term Debt	114,375,000	33.95%	5.64%	1.915%
Preferred Stock	-	0.00%	0.00%	0.000%
Common Equity	135,083,000	40.10%	11.00%	4.411%
Accum Def Inc Tax	84,295,293	25.02%	0.00%	0.000%
Total Capacity	336,867,524	100.00%		6.35%

# Traditional Ratemaking Formula

- Plant in service
- + Fuel inventories
- + Materials & supplies
- Cash working capital
- Accumulated Depreciation
- Accumulated Deferred Income Taxes

RATE BASE



# A Harrowing Tale

Significant debt...\$6.4B

Annual Interest payments of \$421M

Lawsuits

# Which led to:

- Cash flow crisis
- Risk of Credit Rating being downgraded

- Outsourcing
- Fire Sales

# A Harrowing Tale

Significant debt...\$6.4B

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# Which led to:

- Cash flow crisis
- Risk of Credit Rating being downgraded

- Outsourcing
- Fire Sales

# But the story wasn't over:

FedEx Corp vs. US court case provided opportunity

Allowed Tax Dept to generate interest free funds \$\$\$ (ADIT) to help the Company

# We were called Rock Stars!







# Being AGGcelent

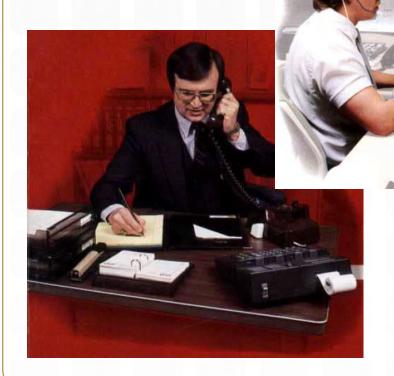
ADIT in different slices federal, various state jurisdictions

Mini Tax Basis Balance Sheet

Challenges - Time Consuming to prepare

Common Missteps

# THEN





Theo Ashcraft Vice President, Security and Loss Prevention



Dan Davies Assistant Controller



C. Ray Gash

#### Note 4—Income taxes

Reconciliations of the statutory federal income tax rate to the effective tax rate, as a percent of pre-tax financial income, are as follows:

	1985	1984	1983
Statutory tax rate	46.0%	46.0%	46.0%
Investment tax credits	(3.0)	(2.7)	(3.2)
State income taxes	2.0	2.1	2.1
Other	1.0	( .3)	(.2)
Effective tax rate	46.0%	45.1%	44.7%

Investment tax credits resulted in reductions of the current federal income tax provisions for 1985, 1984 and 1983 of \$14,866,000, \$9,675,000 and \$7,148,000, respectively.

Deferred tax expense results from timing differences in the recognition of revenue and expense for tax and financial reporting purposes with respect to the following:

	1985	1984	1983
Depreciation	\$17,263,000	\$9,951,000	\$ 6,286,000
Capital leases	(4,936,000)	(3,326,000)	(1,925,000)
Other	(2,516,000)	2,071,000	9,303,000
	\$9,811,000	\$8,696,000	\$13,664,000

# NOW

#### Note 9. Taxes

The components of income before income taxes are as follows:

	Fiscal Years Ended January 31						
(Amounts in millions)		2022		2021		2020	
U.S.	S	15,536	\$	18,068	\$	15,019	
Non-U.S.		3,160		2,496		5,097	
Total income before income taxes	\$	18,696	\$	20,564	\$	20,116	

A summary of the provision for income taxes is as follows:

	Fiscal Years Ended January 31,						
(Amounts in millions)		2022	2	2021		2020	
Current:							
U.S. federal	\$	3,313	\$	2,991	\$	2,794	
U.S. state and local		649		742		587	
International		1,553		1,127		1,205	
Total current tax provision		5,515		4,860		4,586	
Deferred:							
U.S. federal		(671)		2,316		663	
U.S. state and local		41		23		35	
International		(129)		(341)		(369)	
Total deferred tax expense (benefit)		(759)		1,998		329	
Total provision for income taxes	\$	4,756	\$	6,858	\$	4,915	
	_						

#### Effective Income Tax Rate Reconciliation

A reconciliation of the significant differences between the U.S. statutory tax rate and the effective income tax rate on pre-tax income from continuing operations is as follows:

	Fiscal Yea	ars Ended Januar	y 31,
	2022	2021	2020
U.S. statutory tax rate	21.0 %	21.0 %	21.0 %
U.S. state income taxes, net of federal income tax benefit	2.8 %	2.9 %	2.2 %
Income taxed outside the U.S.	(1.5)%	(0.1)%	(1.0)%
Disposal and wind-down of certain business operations	0.5 %	7.1 %	— %
Valuation allowance	4.4 %	2.3 %	2.3 %
Net impact of repatriated international earnings	(0.3)%	(0.4)%	0.4 %
Federal tax credits	(1.1)%	(0.9)%	(0.8)%
Enacted change in tax laws	— %	— %	(1.9)%
Change in reserve for tax contingencies	0.2 %	0.8 %	2.5 %
Other, net	(0.6)%	0.6 %	(0.3)%
Effective income tax rate	25.4 %	33.3 %	24.4 %

# NOW (continued)

#### Deferred Taxes

The significant components of the Company's deferred tax account balances are as follows:

	Janu	ary 31,	
(Amounts in millions)	2022	2021	
Deferred tax assets:			
Loss and tax credit carryforwards	\$ 9,456	\$ 9,179	
Accrued liabilities	2,752	2,582	
Share-based compensation	231	224	
Lease obligations	4,320	4,450	
Other	893	589	
Total deferred tax assets	17,652	17,024	
Valuation allowances	(9,542)	(8,782	
Deferred tax assets, net of valuation allowances	8,110	8,242	
Deferred tax liabilities:			
Property and equipment	4,414	4,802	
Acquired intangibles	1,065	1,071	
Inventory	1,588	1,235	
Lease right of use assets	4,355	4,390	
Mark-to-market investments	1,825	2,678	
Other	307	675	
Total deferred tax liabilities	13,554	14,851	
Net deferred tax liabilities	\$ 5,444	\$ 6,609	

The deferred taxes noted above are classified as follows in the Company's Consolidated Balance Sheets:

		January 3	ary 31,		
(Amounts in millions)	2	022	2021		
Balance Sheet classification					
Assets:					
Other long-term assets	\$	1,473 \$	1,836		
Liabilities:					
Deferred income taxes and other		6,917	8,445		
Net deferred tax liabilities	\$	5,444 \$	6,609		

# NOW (still going)

#### Unremitted Earnings

Prior to the Tax Cuts and Jobs Act of 2017 (the "Tax Act"), the Company asserted that all unremitted earnings of its foreign subsidiaries were considered indefinitely reinvested. As a result of the Tax Act, the Company reported and paid U.S. tax on the majority of its previously unremitted foreign earnings, and repatriations of foreign earnings will generally be free of U.S. federal tax, but may incur other taxes such as withholding or state taxes. As of January 31, 2022, the Company has not recorded approximately \$3 billion of deferred tax liabilities associated with remaining unremitted foreign earnings considered indefinitely reinvested, for which U.S. and foreign income and withholding taxes would be due upon repatriation.

Net Operating Losses, Tax Credit Carryforwards and Valuation Allowances

As of January 31, 2022, the Company's net operating loss and capital loss carryforwards totaled approximately \$39.3 billion. Of these carryforwards, approximately \$26.6 billion will expire, if not utilized, in various years through 2042. The remaining carryforwards have no expiration.

The recoverability of these future tax deductions and credits is evaluated by assessing the adequacy of future expected taxable income from all sources, including taxable income in prior carryback years, reversal of taxable temporary differences, forecasted operating earnings and available tax planning strategies. To the extent the Company does not consider it more likely than not that a deferred tax asset will be recovered, a valuation allowance is generally established. To the extent that a valuation allowance was established and it is subsequently determined that it is more likely than not that the deferred tax assets will be recovered, the change in the valuation allowance is recognized in the Consolidated Statements of Income.

The Company had valuation allowances of \$9.5 billion and \$8.8 billion as of January 31, 2022 and 2021, respectively, on deferred tax assets associated primarily with the net operating loss carryforwards. Activity in the valuation allowance during fiscal 2022 related to valuation allowance builds in multiple markets, as well as releases due to the expiration of underlying deferred tax assets.

#### Uncertain Tax Positions

The benefits of uncertain tax positions are recorded in the Company's Consolidated Financial Statements only after determining a more-likely-than-not probability that the uncertain tax positions will withstand challenge, if any, from taxing authorities.

As of January 31, 2022 and 2021, the amount of gross unrecognized tax benefits related to continuing operations was \$3.2 billion and \$3.1 billion, respectively. The amount of unrecognized tax benefits that would affect the Company's effective income tax rate was \$1.8 billion and \$1.7 billion as of January 31, 2022 and 2021, respectively.

A reconciliation of gross unrecognized tax benefits from continuing operations is as follows:

	Fiscal Years Ended January 31						
(Amounts in millions)		2022		2021	2	2020	
Gross unrecognized tax benefits, beginning of year	S	3,135	\$	1,817	\$	1,305	
Increases related to prior year tax positions		170		92		516	
Decreases related to prior year tax positions		(97)		(264)		(15)	
Increases related to current year tax positions		75		1,582		66	
Settlements during the period		(5)		(64)		(29)	
Lapse in statutes of limitations	9	(33)		(28)		(26)	
Gross unrecognized tax benefits, end of year	\$	3,245	\$	3,135	\$	1,817	

The Company classifies interest and penalties related to uncertain tax benefits as interest expense and as operating, selling, general and administrative expenses, respectively. Interest expense and penalties related to these positions were immaterial for fiscal 2022, 2021 and 2020. During the next twelve months, it is reasonably possible that tax audit resolutions could reduce unrecognized tax benefits by an immaterial amount, either because the tax positions are sustained on audit or because the Company agrees to their disallowance. The Company is focused on resolving tax audits as expeditiously as possible. As a result of these efforts, unrecognized tax benefits could potentially be reduced beyond the provided range during the next twelve months. The Company does not expect any change to have a material impact to its Consolidated Financial Statements.

The Company remains subject to income tax examinations for its U.S. federal income taxes generally for fiscal 2014, and 2018 through 2022. The Company also remains subject to income tax examinations for international income taxes for fiscal 2013 through 2022, and for U.S. state and local income taxes generally for the fiscal years ended 2013 through 2022. With few exceptions, the Company is no longer subject to U.S. federal, state, local, or foreign examinations by tax authorities for years before fiscal 2013.

# Agg Study Formulas

$$a - b = c$$

Where:

a = Book basis (a1) less Book Reserve (b2)

b = Book vs Tax Differences

c = Net Tax Basis

Book Basis (a1) = 
$$d + e + f + g + h$$

Where:

d = Beg Bal

e = Additions

f = Retirements

g = Transfers/Adjustments

h = Other

# Book Reserve (b2) = i + j + k + l + m

Where:

i = Beg Bal Reserve

j = Depr/Amort Exp

k = Retirements

I = Adjustments

m = Gain/Loss

**ADIT Formulas** 

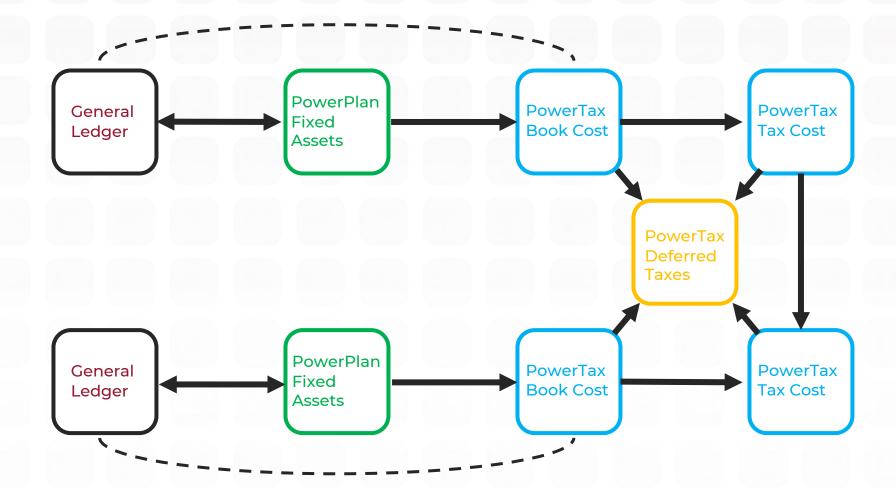
**NET BOOK NET TAX** 

(Tax Cost – Tax Reserve) – (Book Cost – Book Reserve)

**NBNT = TIMING DIFFERENCE** 

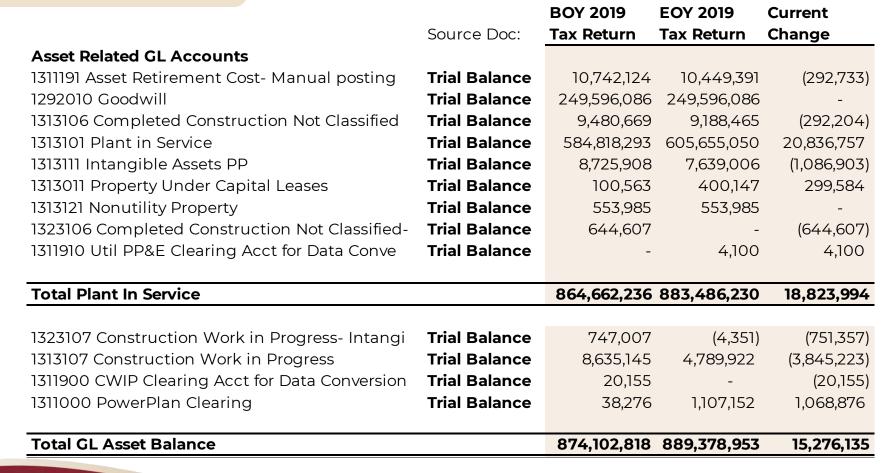
Timing Difference \* Income Tax Rate = ADIT

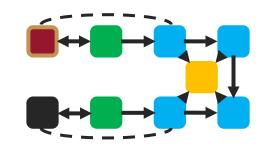




## Worksheet 1 – Timing Differences

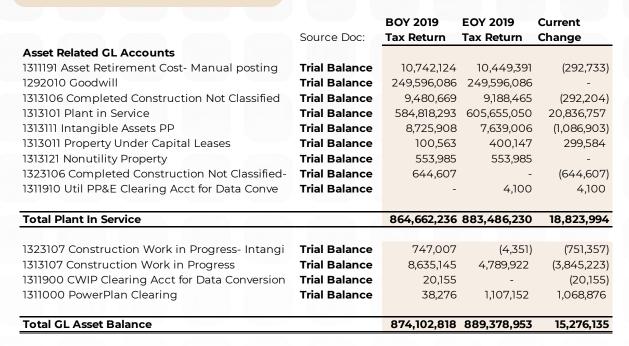
#### **GL ACCOUNT INFORMATIONAL**

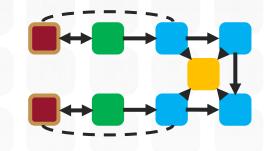




# How do you make sure your ADIT is correct? Worksheet 1 – Timing Differences

#### **GL ACCOUNT INFORMATIONAL**





		BOY 2019	EOY 2019	Current
Reserve Related GL Accounts		Tax Return	Tax Return	Change
1331101 Accum Amortization-Capital Lease (Manu	<b>Trial Balance</b>	(58,715)	(93,829)	(35,113)
1331191 Accum Depreciation - Asset Retirement	<b>Trial Balance</b>	(2,334,051)	(2,603,202)	(269,151)
1331800 Accum. Depreciation - Salvage	<b>Trial Balance</b>	(509,516)	(455,908)	53,608
1331810 Accum. Depreciation - Cost of Removal	Trial Balance	-	-	-
1331811 Accum. Depreciation - Cost of Removal	Trial Balance	-	-	-
1331900 Accum Depreciation - Electric Plant Hi	<b>Trial Balance</b>	2,991,997	3,980,348	988,350
1332108 Accumulated Prov for Depreciation	<b>Trial Balance</b>	(123,669,093)	(130,333,551)	(6,664,458)
1332111 Accumulated Amortization - Intangibles	Trial Balance	(331,816)	(1,229,108)	(897,292)
1333111 Accumulated Amortization - Leasehold I	Trial Balance	(2,703,348)	-	2,703,348
2171200 Reg Liab- Cost of Removal- Current Pd	Trial Balance	(686,252)	(1,065,461)	(379,209)
2220260 Regulatory Liability - Cost of Removal	Trial Balance	(8,568,700)	(7,935,061)	633,639
2220255 Regulatory Liability - COR RWIP	Trial Balance	-	198,011	198,011
Total GL Reserve Balance		(135,869,495)	(139,537,762)	(3,668,267)

Difference

# Worksheet 2 – Controls for Asset and Reserve Detail

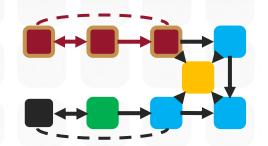
	<b>—</b> ←→		
2019		<b>—</b>	

ASSET BALANCE	TO PPE RECON		BOY 2019					EOY 2019
			Tax Return	Adds	Adjustments	Transfers	Retirements	Tax Return
	PowerPlant Asset Balance	Rpt 1020	614,965,587	25,592,673	-	-	(7,072,363)	633,485,897
	[Month] Estimate	Annualized						-
	Reconcile Adjustments: Transfers							-
	1323107 Construction Work in Progress- Intangi	Trial Balance	747,007	(751,357)				- (4,351
	1313107 Construction Work in Progress Intalign	Trial Balance	8,635,145	(3,845,223)				4,789,922
	1311900 CWIP Clearing Acct for Data Conversion	Trial Balance	20,155	(20,155)				-,, 03,321
	1311000 PowerPlan Clearing	Trial Balance	38,276	1,068,876				1,107,152
	1313011 Property Under Capital Leases		100,563	299,584				400,147
	1292010 Goodwill	Trial Balance	249,596,086	_				249,596,086
	1311910 Util PP&E Clearing Acct for Data Conve		-	4,100				4,100
	PPE Reconciled to the GL		874,102,818	22,348,498			(7,072,363)	- 889,378,953
	General Ledger Balance		874,102,818	15,276,135		-		889,378,953
	Difference		BOY 2019					EOY 2019
	PPE to PowerTax Book Recon		Tax Return	Adds	Adjustments	Transfers	Retirements	Tax Return
	PowerPlant Asset Balance	Rpt 1020	614,965,587	25,592,673	_	-	(7,072,363)	633,485,89
		Annualized						
	Reconcile Adjustments:							
	ARO Not in PowerTax		(10,742,124)	(18,571)			311,304	(10,449,391
	1313011 Property Under Capital Leases	Trial Balance	100,742,124)	(18,571)			311,304	400,14
	1919011 Property Officer Capital Leases	iliai Dalance	100,563	233,58 <del>4</del>				400,14
	Total PPE Asset Balance		604,324,025	25,873,686	_	-	(6,761,059)	623,436,65
	PowerTax Book Balance	PTax Rpt 30	604,323,977	25,873,686		-	(6,761,059)	623,436,60

Proprietary Information of Regulated Capital Consultants, LLC

# Worksheet 2 – Controls for Asset and Reserve Detail

**ASSET BALANCE TO PPE RECON** 



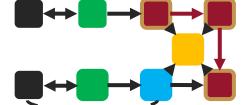
<b>GL - PowerTax Boo</b>	k Cost R	econciliatio	n
CE I OWCI I GA DOO			

	Opening Balance	Ending Balance
Per GL	874,102,818	889,378,953
Minus CWIP	(9,440,582)	(5,892,723)
1311191 Asset Retirement		
Cost- Manual posting	(10,742,124)	(10,449,391)
1292010 Goodwill	(249,596,086)	(249,596,086)
1311910 Util PP&E Clearing		
Acct for Data Conve	-	(4,100)
Per PowerTax Target	604,324,025	623,436,653
PowerTax Actuals	604,323,977	623,436,605
Variance	48	48

## Worksheet 2 – Controls for Asset and Reserve Detail

BOV 2019

EOV 2019



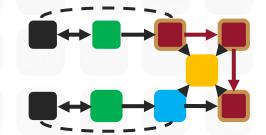
#### **BOOK BASIS – FEDERAL TAX BASIS**

		BOY 2019				EOY 2019
		Tax Return	Adds	<b>Adjustments Transfers</b>	Retirements	Tax Return
PowerTax Book Basis	PTax Rpt 30	604,323,977	25,873,686	-	(6,761,059)	623,436,605
PowerTax Basis Adjustments:						
AFUDC Debt	PTax Rpt 30	(3,223,514)	(209,120)	-	58,496	(3,374,139)
AFUDC Equity	PTax Rpt 30	(1,147,000)	(209,120)	-	8,953	(1,347,167)
Bonus Depr Reduction	PTax Rpt 30	(90,654,402)	-	-	608,051	(90,046,351)
Book Reserve @ Acquisition	PTax Rpt 30	(103,530,511)	-	-	1,479,573	(102,050,938)
IRS to FERC Diff	PTax Rpt 30	227,321,101	-	-	-	227,321,101
Historical Book/Tax Diff	PTax Rpt 30	3,916,387	-		(85,029)	3,831,358
Historical Capitalized Interest	PTax Rpt 30	1,263,653	-	-	(9,863)	1,253,790
Sales Tax Recovery	PTax Rpt 30	-	-		-	-
Tax Capitalized Interest	PTax Rpt 30	-	289,490		-	289,490
Ordinary Retirements	PTax Rpt 30	12,556,583	-		4,700,879	17,257,462
		650,826,275	25,744,935		0	676,571,210
PowerTax FEDERAL Tax Basis	Per Rpt 30	650,826,274	25,744,935	-	0	676,571,209
	Check	1	-		0	1

PowerTax FEDERAL Tax Reserve PTax Rpt 20

BOY 2019	Depreciation		Reserve	Salvage			EOY 2019
Tax Return	Exp	Transfers	Retires	<b>Impacts</b>	COR Impacts Otl	her/Bonus	Tax Return
158,954,576	47,384,942	-	-	-	-	-	206,339,517
							206,339,517

# Worksheet 2 – Controls for Asset and Reserve Detail



BASIS – STATE NON-CONFORM TAX	<b>K</b> BASIS	<b>BOY 2019</b>				EOY 2019
		Tax Return	Adds	Adjustments Transfe	rs Retirements	Tax Return
PowerTax Book Basis	PTax Rpt 30	604,323,977	25,873,686	-	(6,761,059)	623,436,605
PowerTax Basis Adjustments:						
AFUDC Debt	PTax Rpt 30	(3,223,514)	(209,120)	-	58,496	(3,374,139)
AFUDC Equity	PTax Rpt 30	(1,147,000)	(209,120)	-	8,953	(1,347,167)
Book Reserve @ Acquisition	PTax Rpt 30	(103,530,511)	-	-	1,479,573	(102,050,938)
CGT- IRS to FERC Diff	PTax Rpt 30	227,321,101	-		-	227,321,101
Historical Book/Tax Diff	PTax Rpt 30	3,916,387	-	-	(85,029)	3,831,358
Historical Capitalized Interest	PTax Rpt 30	1,263,653	-	-	(9,863)	1,253,790
Sales Tax Recovery	PTax Rpt 30	-	-		-	-
Tax Capitalized Interest	PTax Rpt 30	-	289,490		-	289,490
Ordinary Retirements	PTax Rpt 30	12,736,713	-	-	5,308,930	18,045,643
PowerTax STATE NON-CONFORM						
Tax Basis		741,660,806	25,744,935		0	767,405,741
	Per Rpt 30	741,660,805	25,744,935	-	(O)	767,405,740
	Check	1	-	-	0	1

PowerTax STATE NON-CONFORM	
Tax Reserve	PTax Rpt 30

	<b>BOY 2019</b>	Depreciation		Reserve	Salvage			EOY 2019
	Tax Return	Exp	Transfers	Retires	Impacts	COR Impacts	Other/Bonus	Tax Return
Ī								
	170,208,159	56,267,240	-	-			-	226,475,399
Ī								226 / 75 399

## Worksheet 2 - Controls for Asset and Reserve Detail

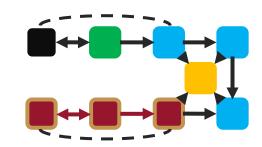
**BOY 2019** 

#### RESERVE BALANCE TO PPE RECON

		BO1 2013	DOOK		Actual	Actual	iiaiisieis/	LO1 2019
	Source Doc:	Tax Return	Provision	Retirements	COR	Salvage	GainLoss	Tax Return
Reserve Balance Per PowerPlant	PwrPlant 1033	(135,810,780)	(12,454,983)	7,072,363	1,051,816	-	495,526	(139,646,058)
[Month] Estimate	Annualized							-
								-
Reconcile Adjustments:								-
								-
1331101 Accum Amortization-Capital Lease (I	Matrial Balance	(58,715)	(35,113)					(93,829)
2220255 Regulatory Liability - COR RWIP	Trial Balance	-			198,011			198,011
Unknown GL to PP Difference			4,110					4,110
								-
PPE Reconciled to the GL		(135,869,495)	(12,485,986)	7,072,363	1,249,827	-	495,526	(139,537,766)
General Ledger Balance		(135,869,495)						(139,537,762)
Difference		-						4

Book

PPE to PowerTax Book Recon Reserve Balance Per PowerPlant [Month] Estimate	PwrPlant 1033 Annualized	BOY 2019 Tax Return (135,810,780)	Book Provision (12,454,983)	<b>Retirements</b> 7,072,363	Actual COR 1,051,816	Actual Salvage	Transfers/ GainLoss 495,526	EOY 2019 Tax Return (139,646,058)
Reconcile Adjustments:								-
Reclass Transfers and Gain/Loss to Provision			495,526				(495,526)	- - -
1331101 Accum Amortization-Capital Lease (N 2220255 Regulatory Liability - COR RWIP	Trial Balance	(58,715) -	(35,113)		198,011			- (93,829) 198,011
Unknown GL to PP Difference Minus ARO	Rpt 1033	2,334,051	4,110 580,454	(311,304)	-	-	-	4,110 2,603,202 - -
Total Reserve Balance		(133,535,444)	(11,410,006)	6,761,059	1,249,827	-	-	(136,934,564)
PowerTax Totals Difference	Rpt 248, 216, 30, 249	(133,535,436) 8	(11,410,006) (0)	6,761,059 (0)	1,249,827 0	- -	- -	(136,934,556) 8



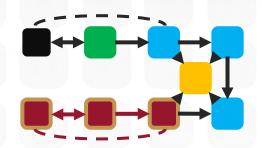
Actual Transfers/ FOY 2019

Actual

Proprietary Information of Regulated Capital Consultants, LLC

## Worksheet 2 – Controls for Asset and Reserve Detail

RESERVE BALANCE TO PPE RECON



# **GL - PowerTax Book Reserve Reconciliation**

Opening	Balance	Ending	Balance

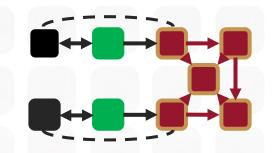
Per GL	(135,869,495)	(139,537,762)
Minus ARO	2,334,051	2,603,202
Per PowerTax Target	(133,535,444)	(136,934,560)
PowerTax Actuals	(133,535,436)	(136,934,556)
Variance	(8)	(4)

# FAS 109 Rate(s) Informational

JURISDICTIONS:	BOY 2019 Tax Return Rates	EOY 2019 Tax Return Rates
Federal	0.21	0.21
State	0.050	0.050
Federal - State Offset	-0.011	-0.011
TOTAL FAS 109 COMPOSITE	0.2495	0.2495

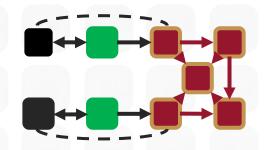
## Worksheet 3 – Plant In-Service Net Book vs Net Tax Tie Out

FEDERAL JURISDICTIONAL



	BOY 2019 Tax Return	EOY 2019 Tax Return	2019 Tax Return Current
Federal (FERC) Tax Balance	650,826,274	676,571,209	25,744,935
Federal (FERC) Tax Reserve	(158,954,576)	(206,339,517)	(47,384,942)
Net Tax Basis	491,871,699	470,231,692	(21,640,007)
Book Balance	604,323,977	623,436,605	19,112,627
Book Reserve	(133,535,444)	(136,934,564)	(3,399,120)
Net Book Basis	470,788,533	486,502,040	15,713,507
FAS 109 Temp Diff - Federal	21,083,165	(16,270,348)	(37,353,514)
Per Rpt 257	21,083,157	(16,270,356)	(37,353,513)
Variance	8	8	(0)
SPECIAL NOTE : Permanent Items FAS 109 Temp Diff - Federal	169,526,510	154,374,787	
[less Permanent Related Items]	(148,443,345)	(170,645,135)	(37,353,514)
FAS 109 Federal STATUTORY Rate	21%	21%	21%
FAS 109 Federal Requirement	(31,173,102)	(35,835,478)	(7,844,238)
FAS 109 State Requirement	(2,720,065)	(3,947,886)	(1,227,822)
Total FAS109 Requirement	(33,893,167)	(39,783,365)	(9,072,059)

## Worksheet 3 – Plant In-Service Net Book vs Net Tax Tie Out

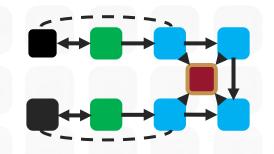


#### STATE JURISDICTIONAL

	<b>BOY 2019 Tax Return</b>	<b>EOY 2019 Tax Return</b>	2019 Tax Return Current	
State Tax Balance	741,660,806	767,405,741	25,744,935	
State Tax Reserve	(170,208,159)	(226,475,399)	(56,267,240)	
Net Tax Basis	571,452,647	540,930,342	(30,522,305)	
Book Balance	604,323,977	623,436,605	19,112,627	
Book Reserve	(133,535,444)	(136,934,564)	(3,399,120)	
Net Book Basis	470,788,533	486,502,040	15,713,507	
FAS 109 Temp Diff - State	100,664,114	54,428,302	(46,235,812)	
Per Rpt 257	100,664,105	54,428,293	(46,235,812)	
Variance	9	9	(0)	
SPECIAL NOTE : Permanent Items	169,526,510	154,374,787		
FAS 109 Temp Diff - State	(68,862,396)	(99,946,485)	(46,235,812)	
FAS 109 State STATUTORY Rate	3.95%	3.95%		
FAS 109 State Requirement	(2,720,065)	(3,947,886)	(1,227,822)	

## Worksheet 3 – Plant In-Service Net Book vs Net Tax Tie Out

Reg Asset / Liability



TOTAL INCOME STATEMENT RELATED DEFERREDS	(43,573,108)	(49,407,909)	29,169,188	
STATUTORY vs INCOME STMT DEFERREDS	9,679,941	9,624,544	(55,397)	ETR Impact
FAS 109 REGULATORY REQUIREMENT - INCREMENT	(9,679,941)	(9,624,544)	55,397	
FAS 109 REGULATORY REQUIREMENT - GROSSUP	(3,218,048)	(3,199,632)	18,416	
TOTAL REGULATORY ACCOUNT	(12,897,989)	(12,824,176)	73,813	
Report 257	(12,897,986)	(12,890,003)	7,984	
Report 237	3	(65,826)	(65,829)	

# **Shortcomings:**

- It's in Excel

  Not very robust
- 2 It's a self-contained document

  Limited in scope to plant related

  ADIT
- 3 It's labor intensive

Each report must be run and exported from the system then dropped into the model

# How do we make sure your ADIT stays correct?

You are exceptionally important to your company.



Your work involves incredible complexity that requires a lot of effort and experience.

# 2 KEYS



Experience to know you have the right answer



Time it takes to make all the necessary checks

# **SYSTEMS**

(we all know and love)

Fixed Asset subledger

Depreciation subledger

Tax Depreciation system

Deferred Tax subledger

Operations (Repairs)

Excel spreadsheets (for basis differences)

Tax Basis Balance Sheet

Tax Compliance

Tax Accounting

Regulatory ledger

Forecast software

# **SYSTEMS**

- SOURCES
- CALCULATION
- DOWNSTREAM (TARGETS/CONSUMER)
  - Deferred Tax subledger

Tax Depreciation system

Tax Basis

Balance Sheet

TaxAccounting

- GLDepreciation subledger
- Fixed Asset subledger

- Excel spreadsheets (for basis differences)
  - Tax
    Compliance

Forecast software

Regulatory ledger

Operations

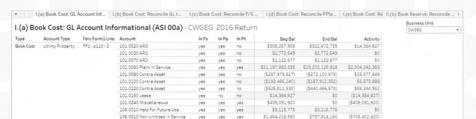
(Repairs)

# ONE, SINGULAR SYSTEM



ype	Account Type	Ferc Form1 Line	Account	In Fs	In Pp	In Pt	Beg Bal	End Bal	Activity
Book Cost	Utility Property	FF1-p110-2	101.0020 ARO	yes	yes	no	\$308,287,908	\$322,672,735	\$14,384,827
			101.0030 ARO	yes	yes	no	\$2,772,649	\$2,772,649	\$0
			101.0070 ARO	yes	yes	no	\$1,122,677	\$1,122,677	\$0
			101.0080 Plant In Service	yes	yes	yes	\$21,197,883,535	\$23,202,125,918	\$2,004,242,383
			101.0090 Contra Asset	yes	yes	no	(\$287,978,827)	(\$272,100,978)	\$15,877,849
			101.0100 Contra Asset	yes	yes	no	(\$193,486,240)	(\$187,912,352)	\$5,573,888
			101.0120 Contra Asset	yes	yes	no	(\$525,811,530)	(\$440,466,578)	\$85,344,952
			101.0150 Lease	yes	no	no	\$14,384,827	\$0	(\$14,384,827
			101.0240 Miscellaneous	yes	yes	yes	\$409,091,920	\$0	(\$409,091,920)
			105.0010 Held For Future Use	yes	yes	yes	\$3,115,775	\$3,115,775	\$0
			106.0010 Non Unitized In Service	yes	yes	yes	\$1,464,216,560	\$757,814,140	(\$706,402,420)
			106.0020 Non Unitized In Service	yes	yes	yes	\$44,882,976	\$16,800,376	(\$28,082,600)
			114.0010 Miscellaneous	yes	yes	yes	\$108,775,774	\$175,838,339	\$67,062,569
			114.0020 Miscellaneous	yes	no	no	(\$218,843,055)	(\$218,843,055)	\$
			118.0020 Utility Property	yes	yes	yes	\$152,588,896	\$197,491,848	\$44,902,95
			Total				\$22,481,003,845	\$23,560,431,494	\$1,079,427,649
	FF1-p110-11+		120.0010 Nuclear Fuel	yes	no	no	(\$30,299,753)	(\$64,605,240)	(\$34,305,487
			120.0030 Nuclear Fuel	yes	no	no	\$604,488,139	\$694,386,838	\$89,898,699
			120.0040 Nuclear Fuel	yes	no	no	(\$464,421,455)	(\$542,918,193)	(\$78,496,738
			120.0120 Nuclear Fuel	yes	no	no	(\$1,198,326,971)	(\$1,329,807,534)	(\$131,480,563
			120.0130 Capital Lease Amort	yes	no	no	\$1,528,320,888	\$1,529,513,496	\$1,192,60
			120.0140 Nuclear Fuel	yes	no	no	(\$180,662,182)	(\$200,391,778)	(\$19,729,596
			120.0150 Nuclear Fuel	yes	no	no	\$190,926,918	\$191,121,465	\$194,54
			Total				\$450,025,584	\$277,299,054	(\$172,726,530
		FF1-p110-12	120.0110 Miscellaneous	yes	no	no	\$29,264,780	\$32,461,979	\$3,197,199
			Total				\$29,264,780	\$32,461,979	\$3,197,199
		Total					\$22,960,294,209	\$23,870,192,527	\$909,898,31
	Nonutility		106.0030 Non Unitized In Service	yes	yes	yes	\$20,238,621	\$23,431,244	\$3,192,623
	Property		121.0020 ARO	yes	yes	no	\$182,619	\$182,619	\$
			121.0030 ARO	yes	yes	no	\$35,477,120	\$35,477,120	\$
			121.0040 Non Utility Property	yes	yes	yes	\$494,704,951	\$498,631,250	\$3,926,29
			121.0190 Non Utility Property	yes	no	no	\$17,822,923	\$29,894,728	\$12,071,80
			Total				\$568,426,234	\$587,616,961	\$19,190,72
		Total					\$568,426,234	\$587,616,961	\$19,190,72
	Total						\$23,528,720,443	\$24,457,809,488	\$929,089,04

## **End Game**



I.(a) Book Cost: GL Account Inf... I.(b) Book Cost: Reconcile GL t... I.(c) Book Cost: Reconcile F/S ... I.(d) Book Cost: Rec

I.(a) Book Cost: GL Account Inf... I.(b) Book Cost: Reconcile GL t... I.(c) Book Cost: Reconcile F/S ...

### I.(b) Book Cost: Reconcile GL to F/S (ASI 00b) - CWGEG 2016 Return

Account Type	Source	Data Type Rec Issue	Rec Item	Beg Bal	End Bal
Utility Property	GL	Unadjusted		\$22,960,294,209	\$23,870,192,527
		Adjustment PT-In PT not PP	CWIP - Not in PP or GL	\$521,884,000	\$831,021,000
		Adjusted		\$23,482,178,209	\$24,701,213,527
	F/S	Unadjusted		\$23,482,178,000	\$24,701,213,000
		Adjusted		\$23,482,178,000	\$24,701,213,000
		Unreconciled		\$209	\$527
Nonutility Property	GL	Unadjusted		\$568,426,234	\$587,616,961
		Adjustment F/S Reclass	: F/S Reclass	(\$315,384,704)	(\$319,981,581)
		Adjusted		\$253,041,530	\$267,635,380
	F/S	Unadjusted		\$253,042,000	\$267,635,000
		Adjusted		\$253,042,000	\$267,635,000
		Unreconciled		(\$470)	\$380

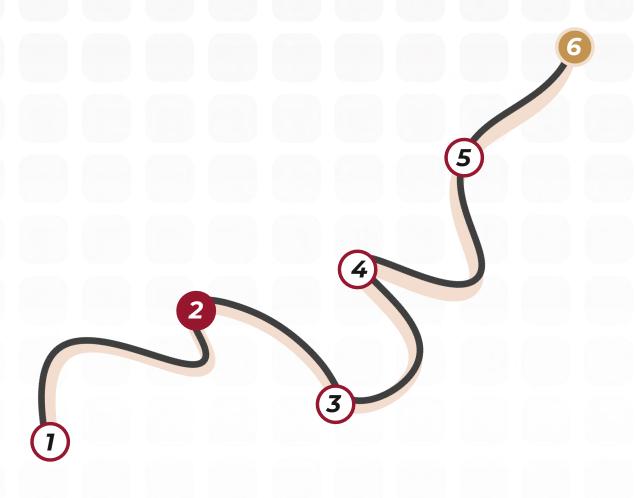
#### Total of Utility Property and Nonutility Property F/S

Beginning Balance: \$23,735,220,000 Ending Balance: \$24,968,848,000

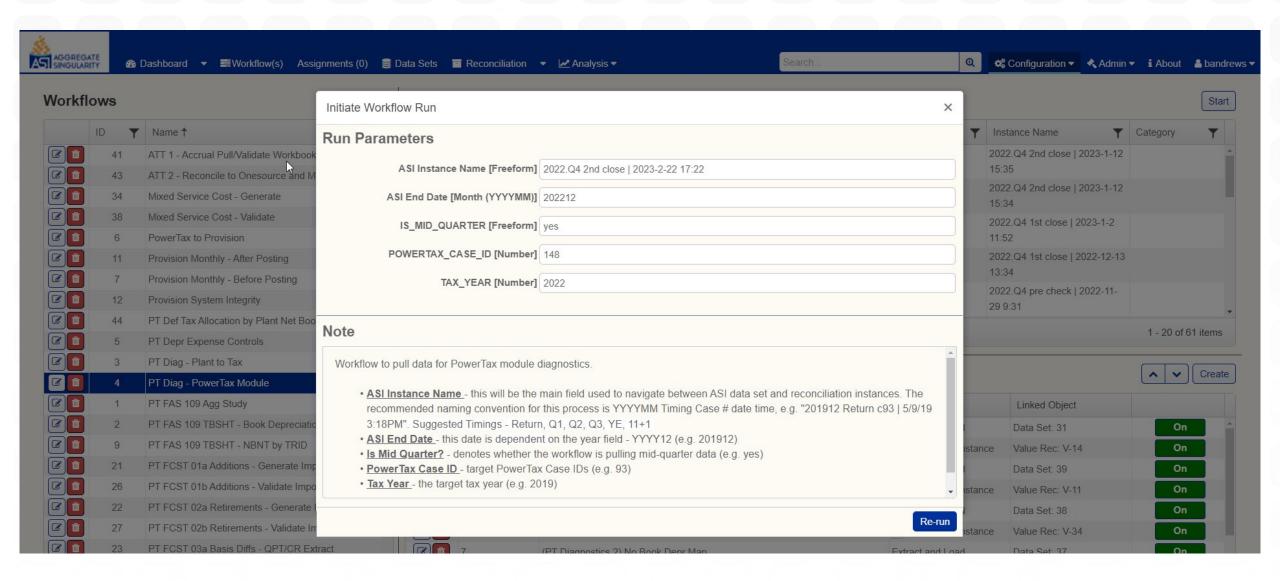
### I.(c) Book Cost: Reconcile F/S to PP (ASI 01) - CWGEG 2016 Return

Source	Data Type	Rec Issue	Rec Item	Beg Bal	End Bal
F/S	Unadjusted			\$23,735,220,000	\$24,968,848,000
	Adjustment	F/S Reclass PT-In F/S not PP	122.0020 ARO: F/S Reclass	\$4,064,163	\$5,123,027
			122.0030 ARO: F/S Reclass	\$138,319	\$141,541
			122.0130 Depreciation Other: F/S Reclass	\$26,423	\$0
			122.0140 Depreciation Other: F/S Reclass	\$218,323,796	\$225,014,179
			253.0160 Defer Credits: F/S Reclass	(\$56,694,083)	(\$59,823,252)
			253.0170 Defer Credits: F/S Reclass	\$149,526,086	\$149,526,086
			101.0150 Lease: Not in PP	(\$14,384,827)	\$0
			114.0030 Miscellaneous: Not in PP	\$218,843,055	\$218,843,055
			120.0010 Nuclear Fuel: Not in PP	(\$604,488,139)	(\$694,386,838)
			120.0030 Nuclear Fuel: Not in PP	\$464,421,455	\$542,918,193
			120.0040 Nuclear Fuel: Not in PP	\$180,662,182	\$200,391,778
			120.0070 Nuclear Fuel: Not in PP	\$30,299,753	\$64,605,240
			120.0110 Miscellaneous: Not in PP	(\$29,264,780)	(\$32,461,979)
		7	120.0120 Nuclear Fuel: Not in PP	(\$190,926,918)	(\$191,121,465)
			120.0130 Capital Lease Amort: Not in PP	(\$1,528,320,888)	(\$1,529,513,496)
			120.0140 Nuclear Fuel: Not in PP	\$1,198,326,971	\$1,329,807,534
			121.0190 Non Utility Property: Not in PP	(\$17,822,923)	(\$29,894,728)
		PT-In PT not PP	CWIP - Not in PP or GL	(\$521,884,000)	(\$831,021,000)
		GL Topsides	2015 Topside for Late Adds	\$14,385,010	\$0
	Adjusted			\$23,250,450,655	\$24,336,995,875
Property	Unadjusted			\$23,250,450,184	\$24,336,996,760
Subledger	Adjusted			\$23,250,450,184	\$24,336,996,760
	Unreconciled	ŀ		\$471	(\$885)

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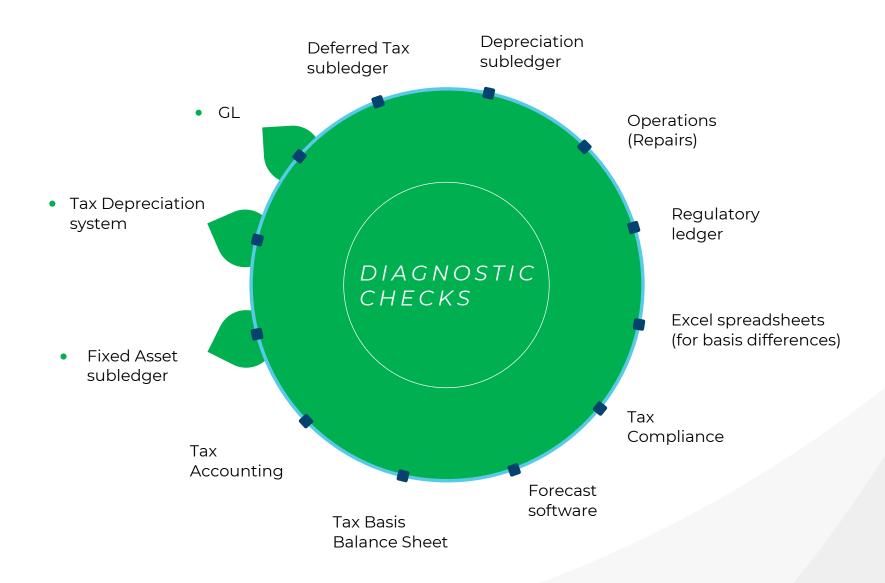


# **WORKFLOW**

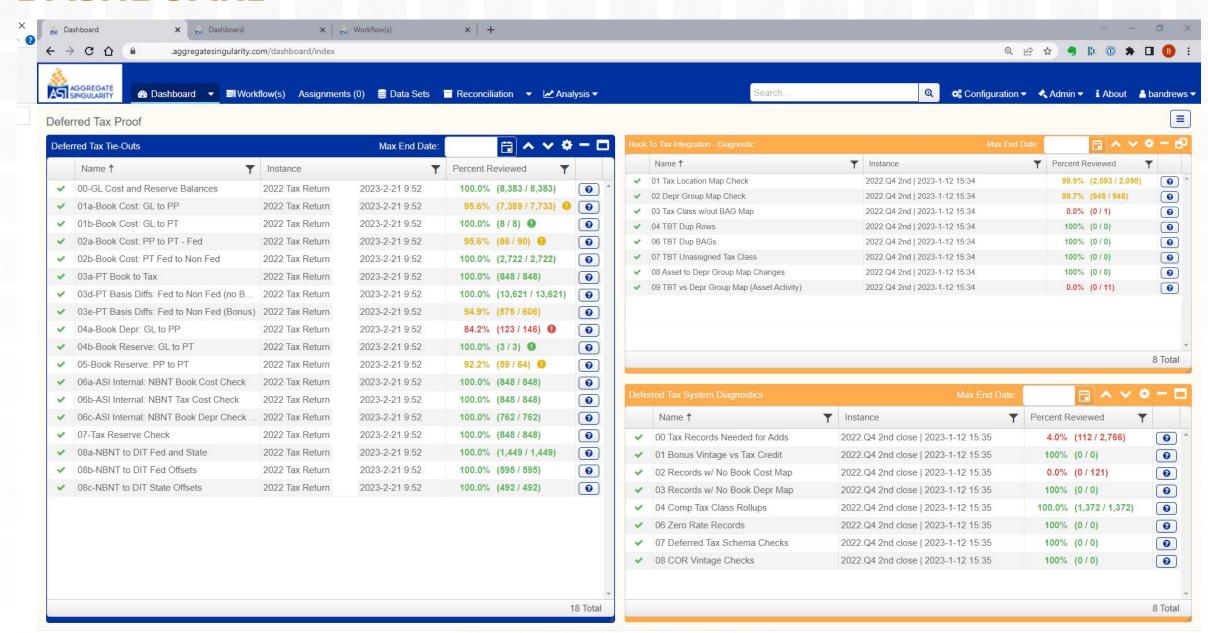


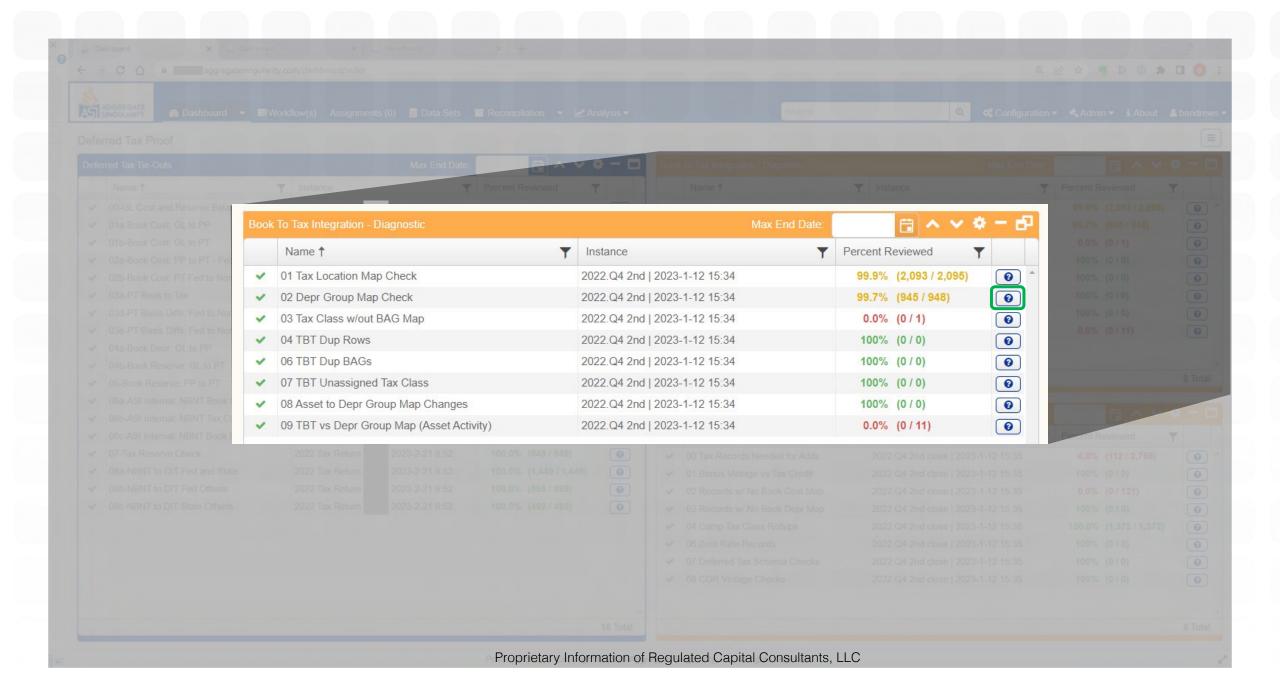
# ONE, SINGULAR SYSTEM

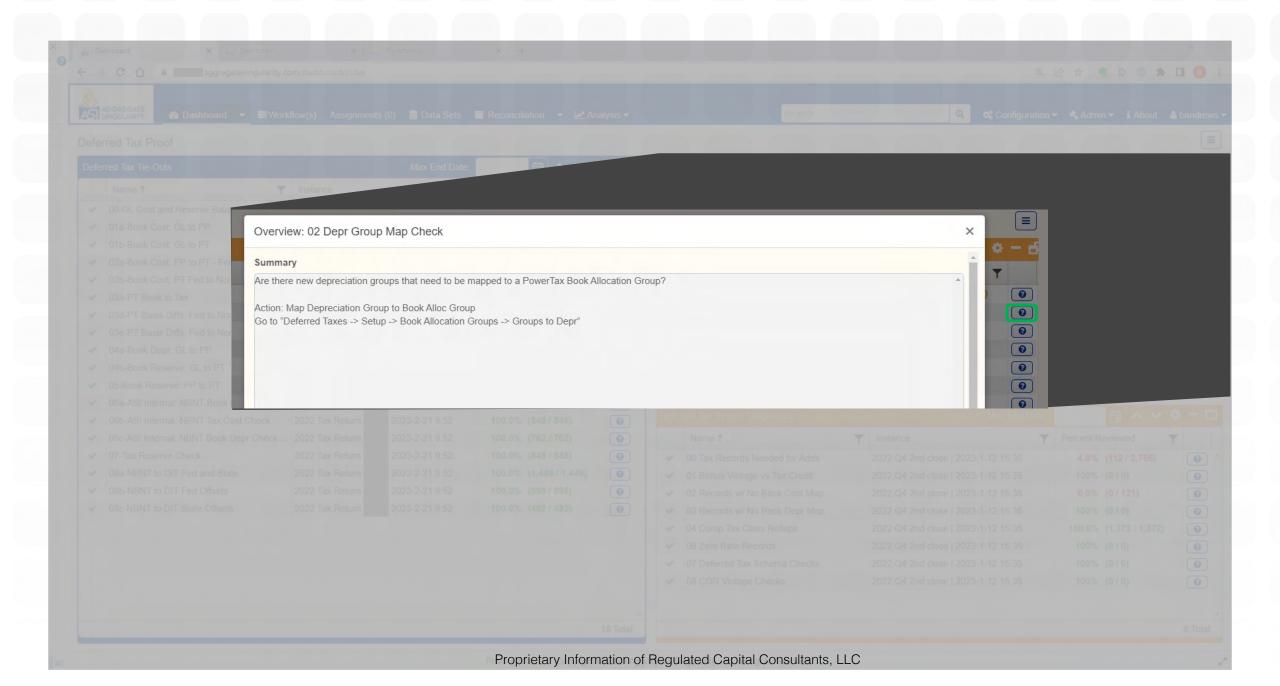




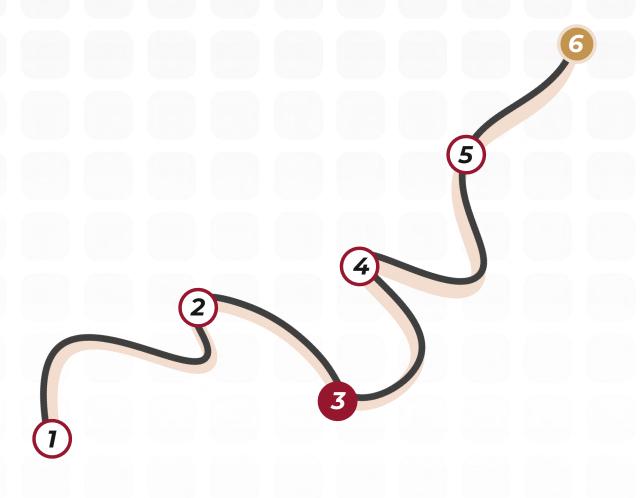
## **DASHBOARD**



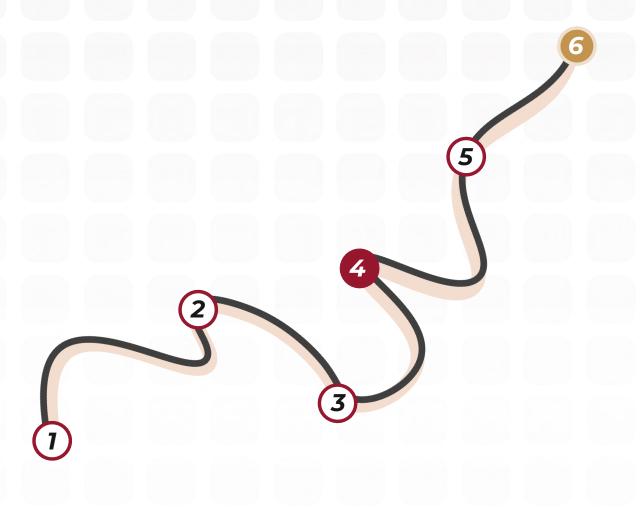




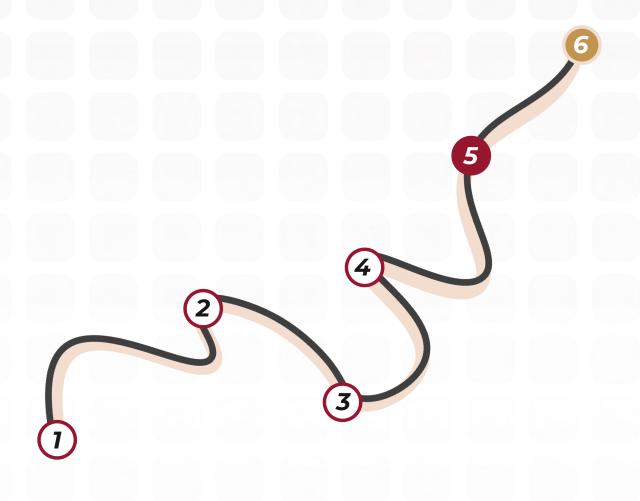
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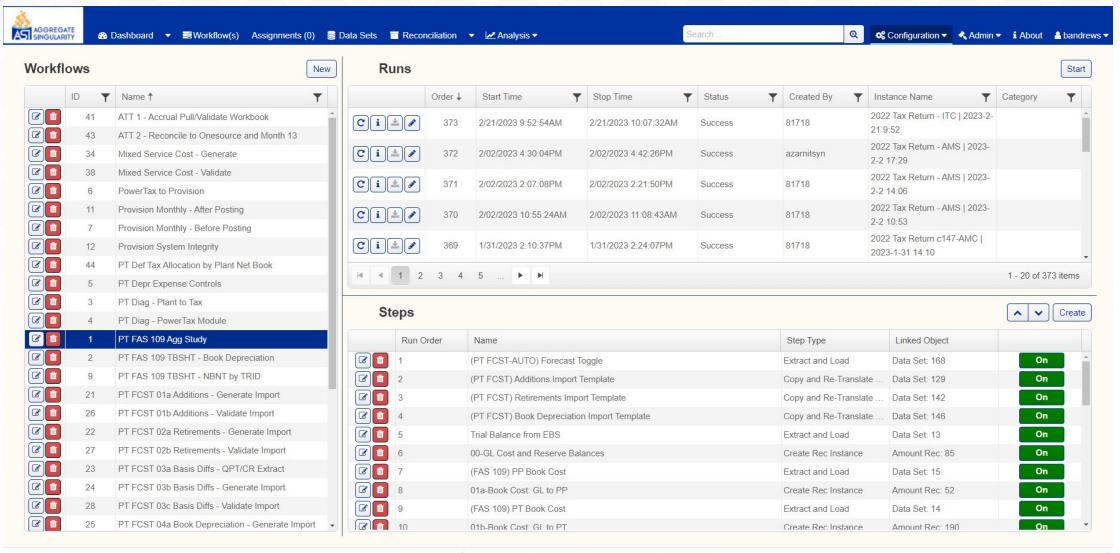
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# WORKFLOW

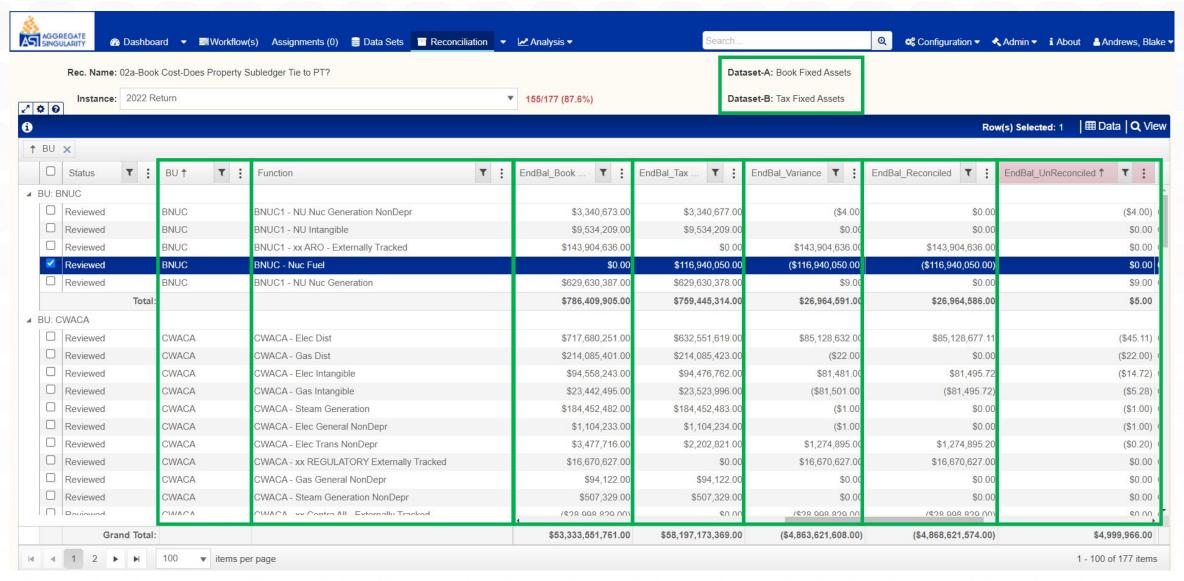


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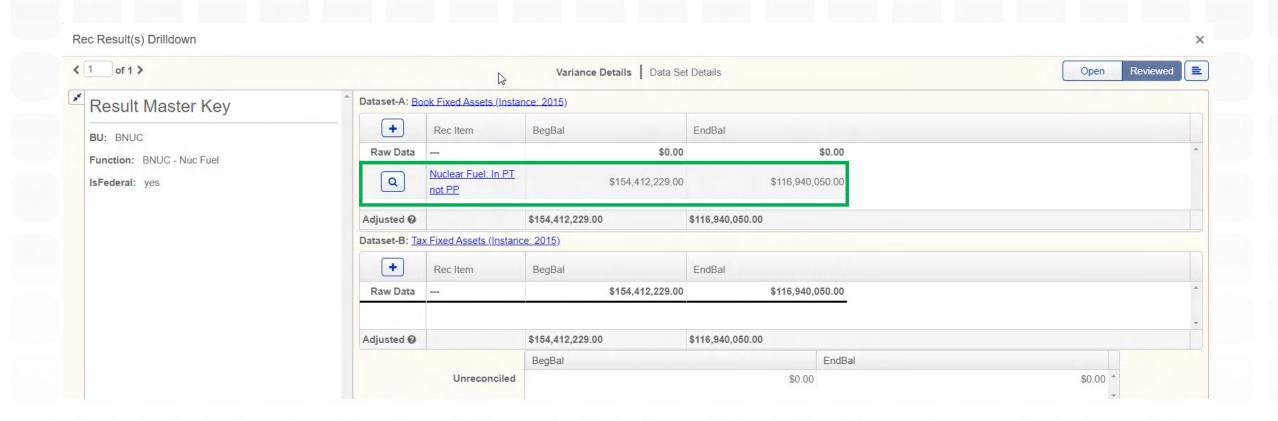
# **DASHBOARD**

	Deferred Tax Tie-Outs	Max End Date:	<b>□</b> ^ <b>∨ □</b> □	
@ Dashbo	Name ↑	▼ Instance ▼	Percent Reviewed	ation - Admin - About abat
rred Tax Proof	✓ 00-GL Cost and Reserve Balances	2022 Tax Return - ITC   2023-2-21 9:52	100.0% (8,383 / 8,383)	
rred Tax Tie-Outs	✓ 01a-Book Cost: GL to PP	2022 Tax Return - ITC   2023-2-21 9:52	95.6% (7,389 / 7,733) ① ②	
Name †	✓ 01b-Book Cost: GL to PT	2022 Tax Return - ITC   2023-2-21 9:52	100.0% (8 / 8)	Percent Reviewed 99.9% (2,093 / 2,095)
01a-Book Cost: GL to PP	✓ 02a-Book Cost: PP to PT - Fed	2022 Tax Return - ITC   2023-2-21 9:52	95.6% (86 / 90) (9	99.5% (2.093 / 2,095)
01b-Book Cost: GL to PT	✓ 02b-Book Cost: PT Fed to Non Fed	2022 Tax Return - ITC   2023-2-21 9:52	100.0% (2,722 / 2,722)	0.0% (0 / 1)
02a-Book Cost: PP to PT 02b-Book Cost: PT Fed to	✓ 03a-PT Book to Tax	2022 Tax Return - ITC   2023-2-21 9:52	100.0% (848 / 848)	100% (0 / 0)
03a-PT Book to Tax	✓ 03d-PT Basis Diffs: Fed to Non Fed (no	B 2022 Tax Return - ITC   2023-2-21 9:52	100.0% (13,621 / 13,621)	100% (0 / 0)
03d-PT Basis Diffs: Fed to	✓ 03e-PT Basis Diffs: Fed to Non Fed (Bo	onus) 2022 Tax Return - ITC   2023-2-21 9:52	94.9% (575 / 606)	100% (0 / 0)
04a-Book Depr. GL to PP	✓ 04a-Book Depr: GL to PP	2022 Tax Return - ITC   2023-2-21 9:52	84.2% (123 / 146) 1	0.0% (0 / 11)
04b-Book Reserve: GL to	✓ 04b-Book Reserve: GL to PT	2022 Tax Return - ITC   2023-2-21 9:52	100.0% (3 / 3)	
05-Book Reserve: PP to F 06a-ASI Internal: NBNT B	✓ 05-Book Reserve: PP to PT	2022 Tax Return - ITC   2023-2-21 9:52	92.2% (59 / 64) ①	
06b-ASI Internal: NBNT To	✓ 06a-ASI Internal: NBNT Book Cost Che	CONTRACTOR AND CONTRACTOR OF THE CONTRACTOR OF T	100.0% (848 / 848)	ate A V 🌣
06c-ASI Internal: NBNT B	✓ 06b-ASI Internal: NBNT Tax Cost Checl	100	100.0% (848 / 848)	Y Percent Reviewed Y
08a-NBNT to DIT Fed and		eck 2022 Tax Return - ITC   2023-2-21 9:52	100.0% (762 / 762)	4.0% (112 / 2,766) 100% (0 / 0)
08b-NBNT to DIT Fed Offs	✓ 07-Tax Reserve Check	2022 Tax Return - ITC   2023-2-21 9:52	100.0% (848 / 848)	0.0% (0 / 121)
08c-NBN1 to DIT State Of	✓ 08a-NBNT to DIT Fed and State	2022 Tax Return - ITC   2023-2-21 9:52	100.0% (1,449 / 1,449)	100% (0 / 0)
	✓ 08b-NBNT to DIT Fed Offsets	2022 Tax Return - ITC   2023-2-21 9:52	100.0% (595 / 595)	100.0% (1,372/1,372) (
	✓ 08c-NBNT to DIT State Offsets	2022 Tax Return - ITC   2023-2-21 9:52	100.0% (492 / 492)	100% (0 / 0)
	The state of the s	10   2020 2 21 0.02	1333	100% (0 / 0)
		40 Teles		

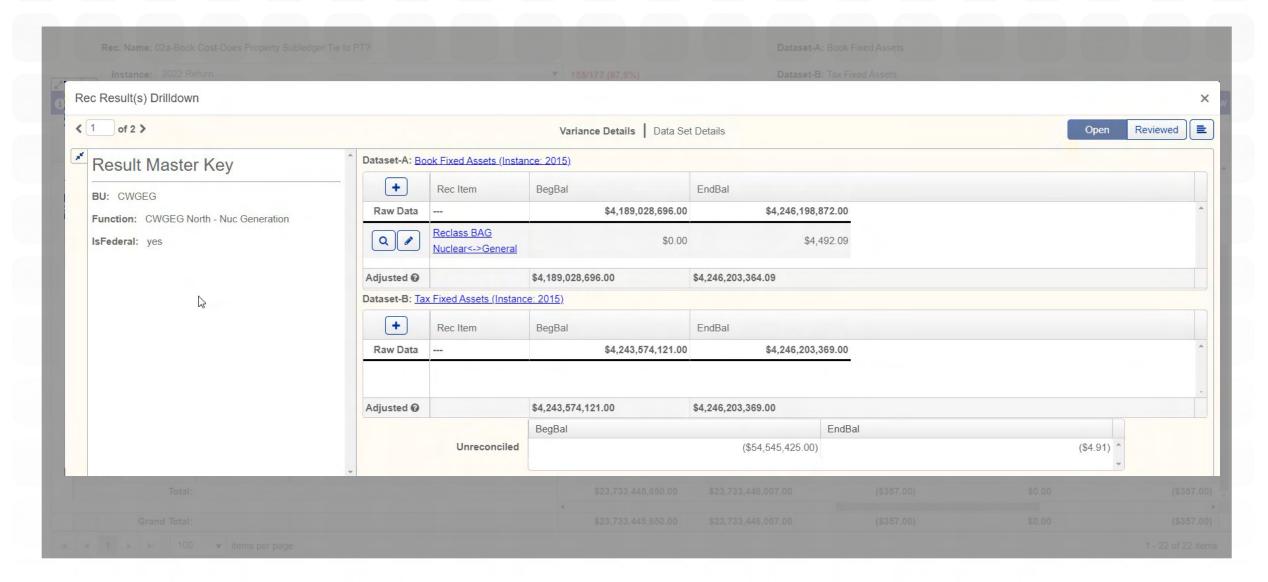
# RECONCILIATION



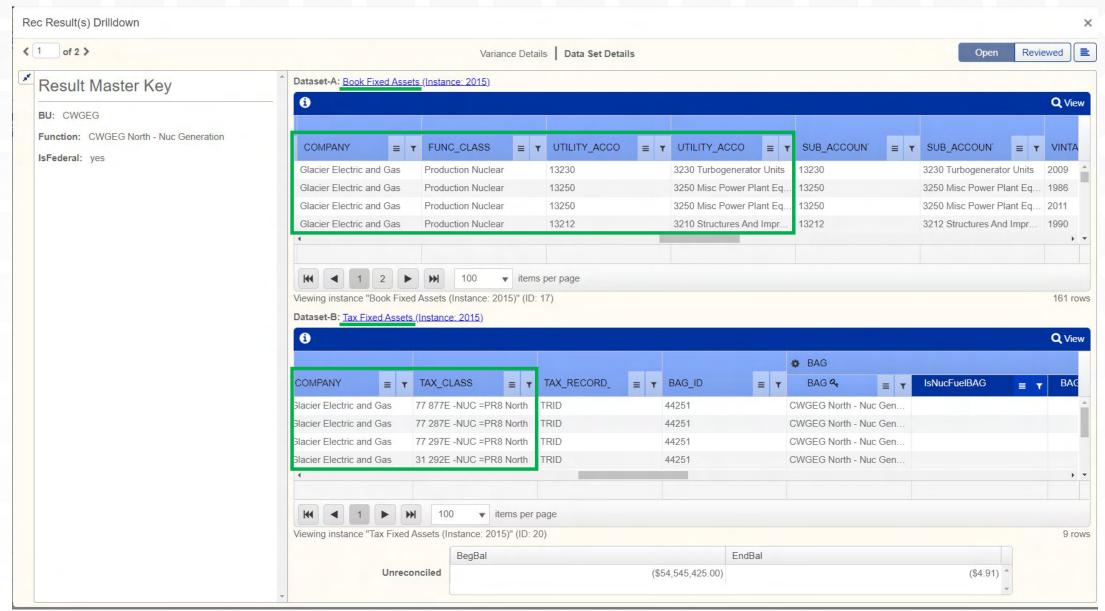
# **AUTOMATED RECONCILING ITEM**



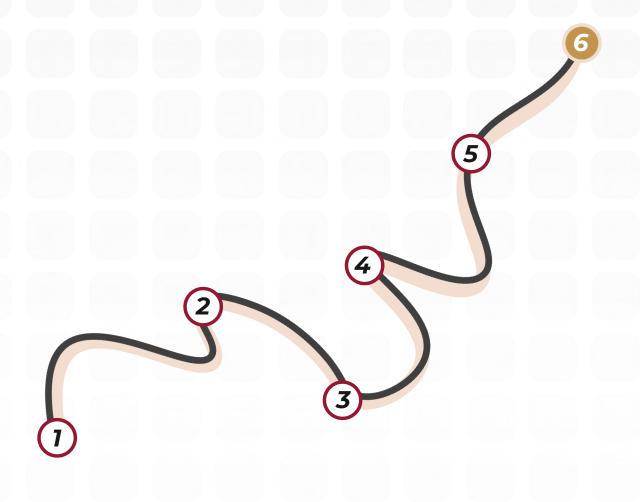
# MANUAL RECONCILING ITEM



# **DETAILED DATA**

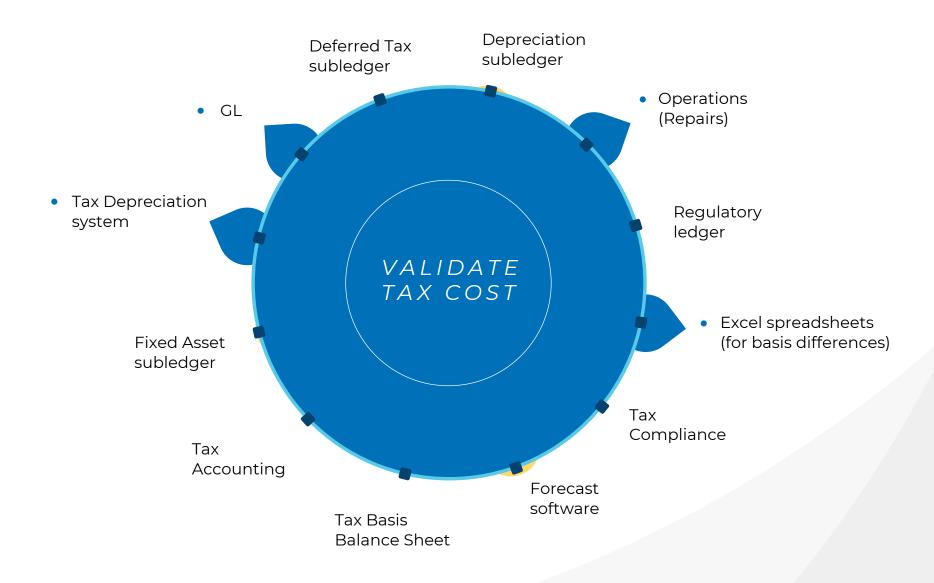


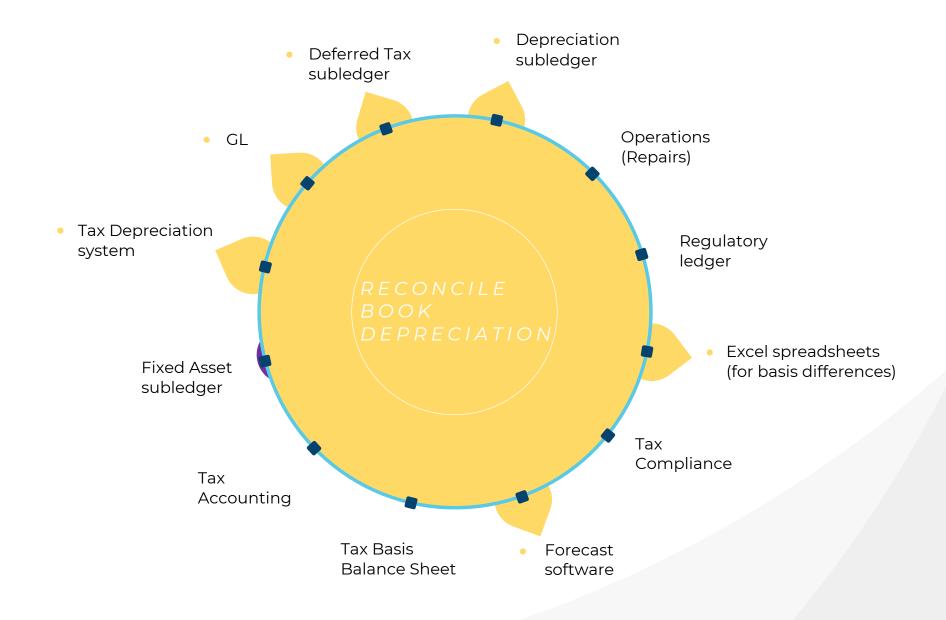
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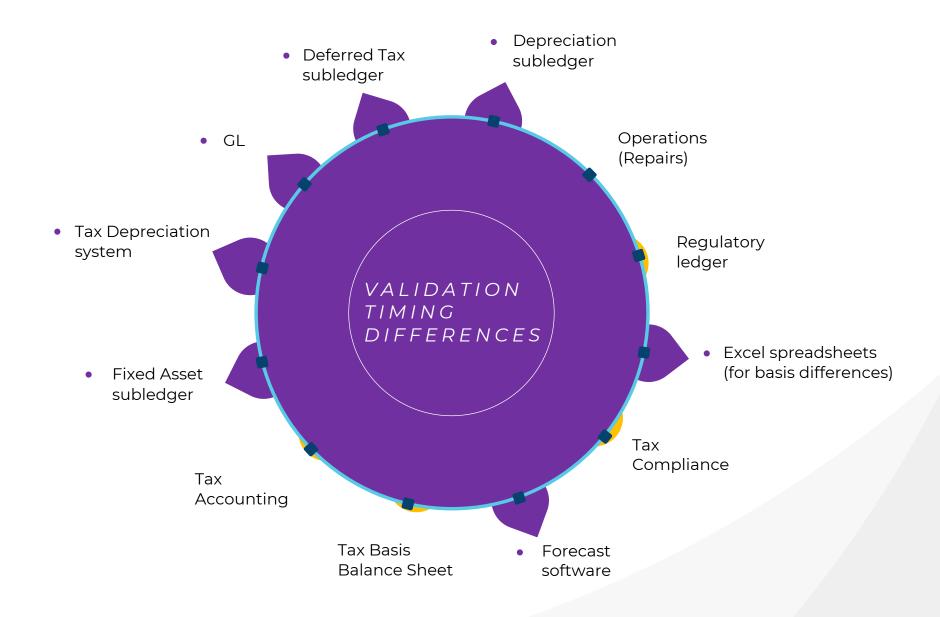


# ONE, SINGULAR SYSTEM



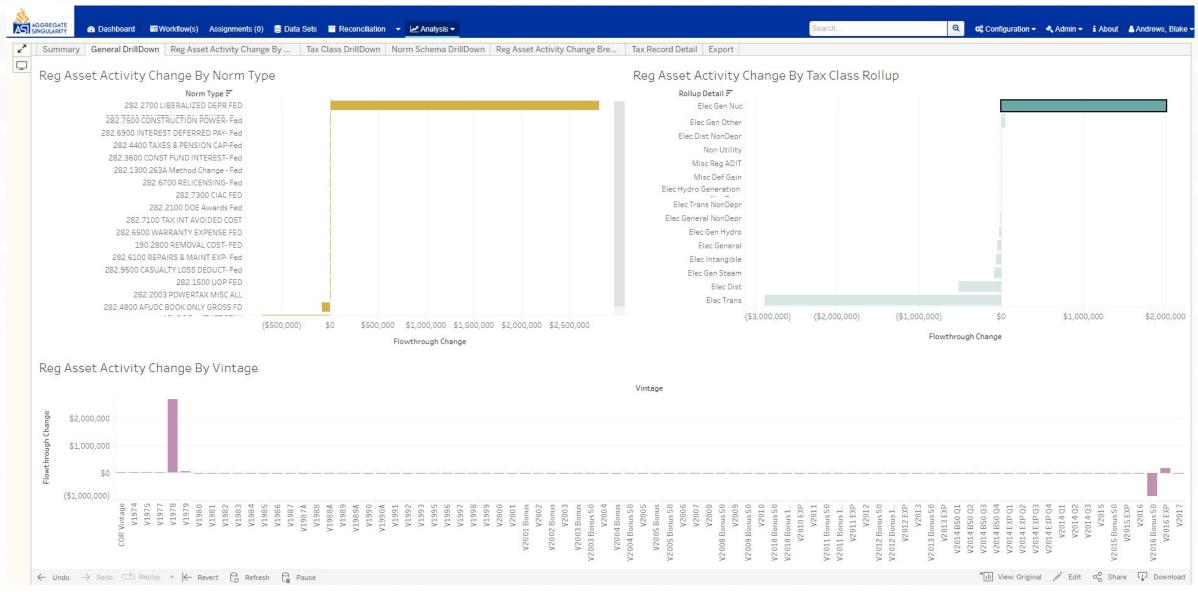




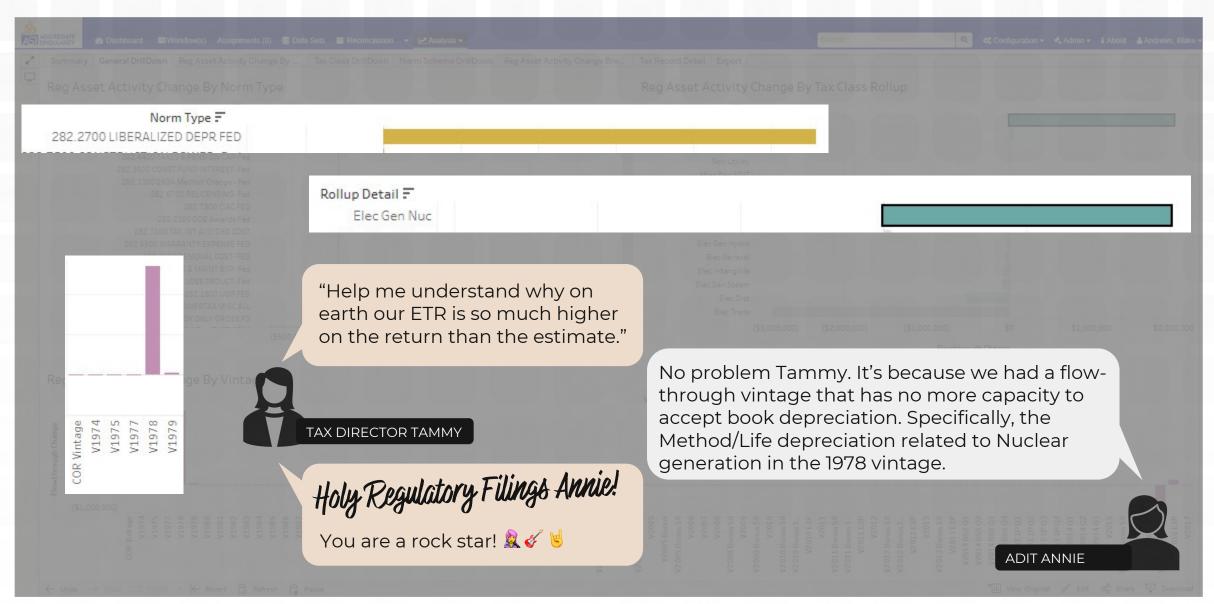




## TAX EXPENSE ANALYSIS SUPPORT



# TAX EXPENSE ANALYSIS SUPPORT



# Benefit from a Platform Hand-Built for Utilities



Eliminates hundreds of hours of validation cycles



Time to value is extremely fast



Includes decades of embedded experience



Entire annual property ETR movement explained and validated



Security blanket for new resources



Entire reg asset/liability position explained and validated

# What's next?



Deeper dire training with your team



Analysis of your Power Tax data quality



Streamline your tax function and enable your team with ASI

# UNDERSTANDING VALIDATING REGULATORY DEFERRED **TAXES**

Best practices for utility tax professionals

