

Discussion Slides: Alaska Senate Finance Committee

March 29, 2012 Janak Mayer Manager, Upstream & Gas PFC Energy

Difficulties in Existing Fiscal Structure

- The incorporation of progressivity into the Profit-Based Production Tax (Net) in ACES creates two significant problems
 - Large-scale gas production at low gas prices could in the future significantly reduce production tax revenue from existing oil production
 - Resolving this problem within the framework of ACES requires significant complexity
 - Approach to decoupling in CSSB 192 requires ability to split costs between oil and gas production, creating high degree of administrative burden, and limiting capacity of state to effectively audit
 - Options for incentivizing new production are limited, and relatively complex
 - Proposed incentives within existing framework focus on either allowances to reduce Production Tax Value, or revenue exclusions (tax holiday)



Summary of Progressive Severance Tax (Gross) Option

- A Progressive Severance Tax (Gross) option would instead remove progressivity from the Profit-Based Production Tax (Net), instead levying this tax at the flat, base rate of 25%
- To retain an element of progressivity, a new Progressive Severance Tax (Gross) would then be added to the system. The tax would:
 - Be non-deductible for Profit-Based Production Tax purposes
 - Be levied on gross production (net of royalties)
 - Be levied solely on oil
 - The tax would use a progressivity structure not dissimilar to that under the current system, with progressivity coefficients that apply at different thresholds. The optioned modeled here has the following parameters:
 - Base rate of 0%
 - Progressivity of .25% commencing at a threshold of \$65 (gross value at point of production)
 - At \$125 GVPP, a tax rate of 15% is reached. At this point, progressivity is reduced to 0.05%
 - Progressivity is capped 20%



Benefits of Progressive Severance Tax (Gross) Structure

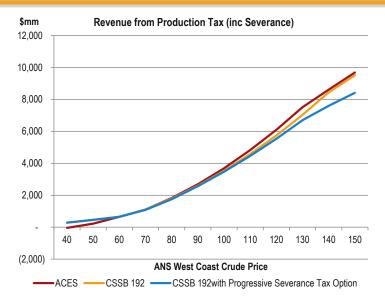
- By removing progressivity from the Profit-Based Production Tax (Net), and having the progressive element of the structure be a Progressive Severance Tax (Gross), two things become much easier to achieve
 - The issue of gas production reducing production tax revenue ceases to be a problem without progressivity in the Profit-Based Production Tax
 - Complex provisions to split costs between oil and gas production under CSSB 192 are thus no longer required
 - Significant incentives can be provided to new production, by eliminating or reducing the Progressive Severance Tax (Gross) for new production
- A wide range of levels of government take can be achieved using this structure, depending on the parameters applied

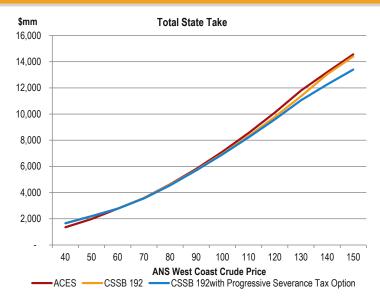


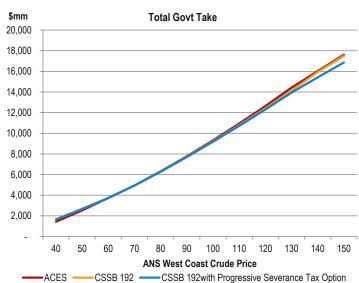
FY 2013 Revenue Comparison

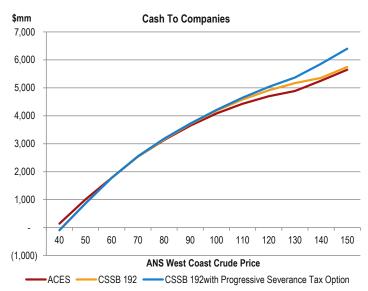
		Production Tax			Total State Take			Total Government Take			Cash to Companies		
		ACES	CSSB 192	CSSB 192 with Progressive Severance Tax Option	ACES	CSSB 192	CSSB 192 with Progressive Severance Tax Option	ACES	CSSB 192	CSSB 192 with Progressive Severance Tax Option	ACES	CSSB 192	CSSB 192 with Progressive Severance Tax Option
	40	(39)	289	289	1,352	1,660	1,660	1,427	1,660	1,660	139	(95)	(95)
	50	222	461	461	1,983	2,202	2,202	2,527	2,669	2,669	1,010	868	868
4	60	653	653	653	2,769	2,769	2,769	3,728	3,728	3,728	1,780	1,780	1,780
Price	70	1,109	1,106	1,084	3,577	3,575	3,555	4,943	4,941	4,929	2,536	2,538	2,551
<u> </u>	80	1,831	1,792	1,754	4,631	4,595	4,560	6,318	6,294	6,272	3,133	3,157	3,179
S West Coast Oil	90	2,692	2,599	2,571	5,811	5,725	5,699	7,775	7,719	7,703	3,648	3,703	3,720
	100	3,691	3,527	3,474	7,117	6,966	6,918	9,314	9,216	9,184	4,080	4,178	4,209
	110	4,827	4,575	4,463	8,549	8,318	8,215	10,935	10,785	10,718	4,430	4,581	4,647
	120	6,102	5,744	5,538	10,108	9,781	9,592	12,638	12,425	12,302	4,698	4,911	5,034
	130	7,515	7,035	6,700	11,794	11,354	11,047	14,424	14,138	13,939	4,884	5,170	5,370
	140	8,614	8,445	7,598	13,192	13,037	12,261	16,023	15,922	15,417	5,257	5,357	5,862
ANS	150	9,684	9,512	8,417	14,563	14,406	13,402	17,604	17,502	16,849	5,647	5,749	6,402

FY 2013 Revenue Comparison









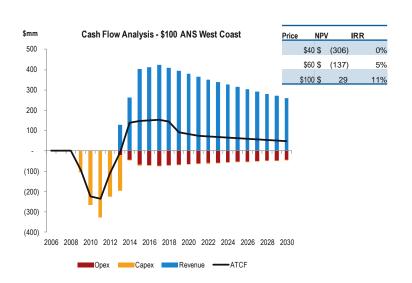


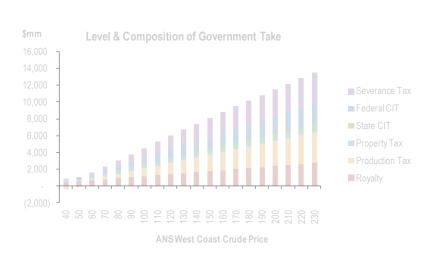
Incentives for New Production

- Significant incentives can be provided to new production, by eliminating or reducing the Progressive Severance Tax (Gross) on any combination of:
 - Production from new areas
 - Production from new plans of development (determined through the regulatory process to be for "new production")
 - Production above a fixed decline rate
- Here, a reduced rate of Progressive Severance Tax has been modeled, using the following parameters for new production:
 - Base rate of 0%
 - Progressivity of .05% commencing at a threshold of \$65 (gross value at point of production)
 - Progressivity is capped 5%
- Following slides show a new, high-cost 10 mb/d development under
 - The regular rate
 - The reduced rate (with a time limit of 7 years)
 - The reduced rate (with no time limit)

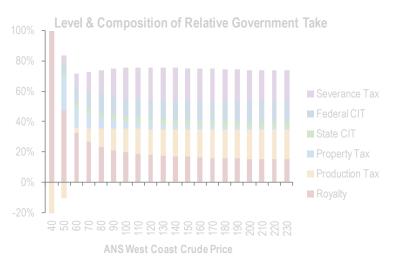


Severance Tax – 20% Maximum (New Producer)



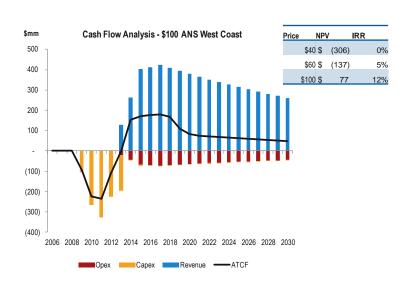


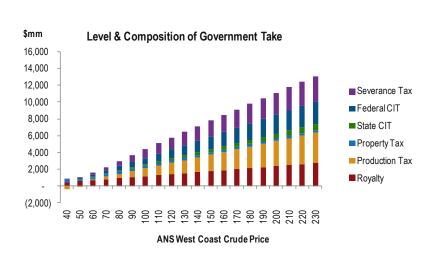
Price	Royalty	Severance Tax	Production Tax	Property Tax	State CIT	Total State Take	Federal CIT	Total GT
40	156%	4%	-115%	96%	0%	140%	0%	140%
50	47%	6%	-11%	23%	1%	67%	6%	73%
60					3%	61%	10%	
70	26%	13%			3%	61%	12%	73%
80	23%	16%	12%		3%	62%	12%	74%
90	21%	18%	14%	6%	3%	63%	12%	
100	20%	20%	15%	5%	3%	63%	12%	
110	19%	21%	16%	4%	3%	63%	13%	
120	18%	21%	17%	4%	3%	63%	13%	
130	17%	22%	17%		3%	63%	13%	
140	17%	22%	18%	3%	3%	63%	13%	
150	17%	22%			3%	62%	13%	
160		21%		2%	3%	62%	13%	
170		21%	19%	2%	3%	62%	13%	
180	16%		19%		4%	61%	13%	75%
190	16%		19%		4%	61%	13%	74%
200					4%	60%	13%	
210					4%	60%	14%	
220	15%		19%		4%	60%	14%	74%
230	15%				4%	60%	14%	74%

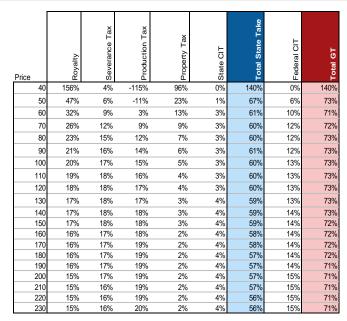


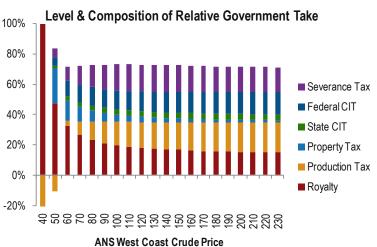


Severance Tax – 20% Maximum with first 7 years at a 5% maximum (New Producer)



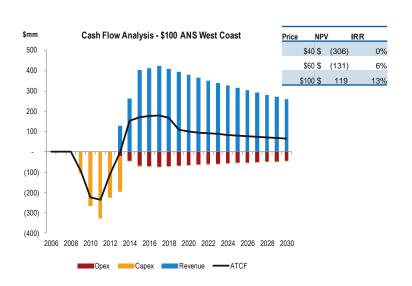


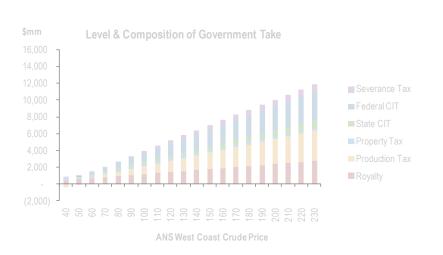




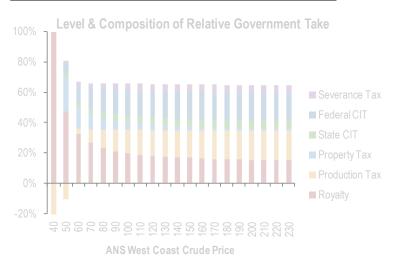


Severance Tax – 5% Maximum (New Producer)



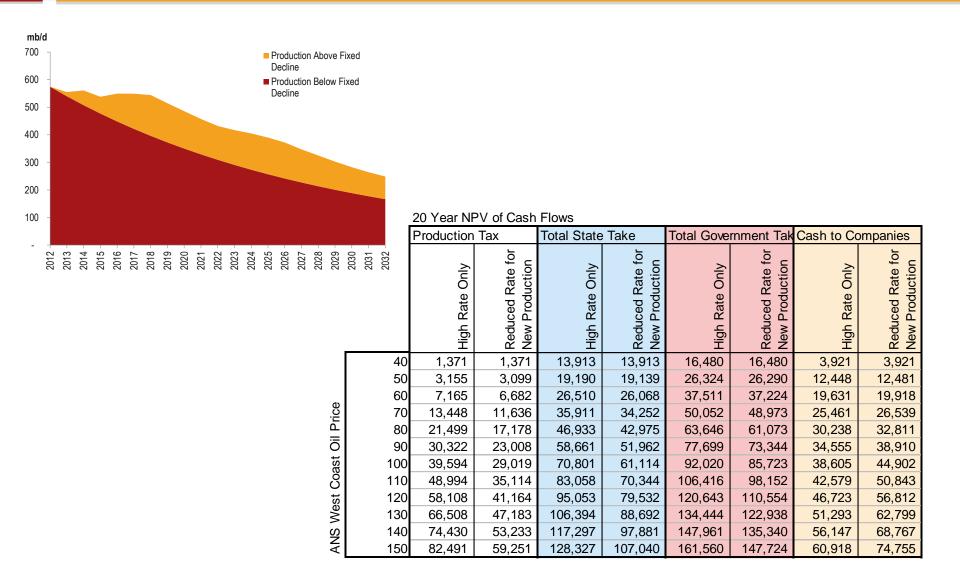


Price	Royalty	Severance Tax	Production Tax	Property Tax	State CIT	Total State Take	Federal CIT	Total GT
40	156%	1%	-115%	96%	0%	137%	0%	137%
50	47%	1%	-11%	23%	2%	63%	7%	69%
60	32%	2%		13%	3%	54%	13%	67%
70	26%				4%	51%	15%	66%
80	23%	4%	12%	7%	4%	50%	16%	66%
90	21%	4%	14%	6%	4%	49%	16%	66%
100	20%	5%	15%	5%	4%	49%	17%	66%
110	19%		16%	4%	4%	49%	17%	66%
120	18%	5%	17%	4%	5%	48%	17%	65%
130	17%		17%		5%	48%	17%	65%
140	17%	5%	18%	3%	5%	48%	17%	65%
150	17%				5%	47%	18%	65%
160				2%	5%	47%	18%	65%
170	16%		19%	2%	5%	47%	18%	65%
180	16%		19%		5%	47%	18%	65%
190	16%	5%	19%		5%	46%	18%	65%
200	15%		19%		5%	46%	18%	65%
210	15%		19%		5%	46%	18%	65%
220	15%		19%		5%	46%	18%	65%
230	15%	5%	20%	2%	5%	46%	19%	64%

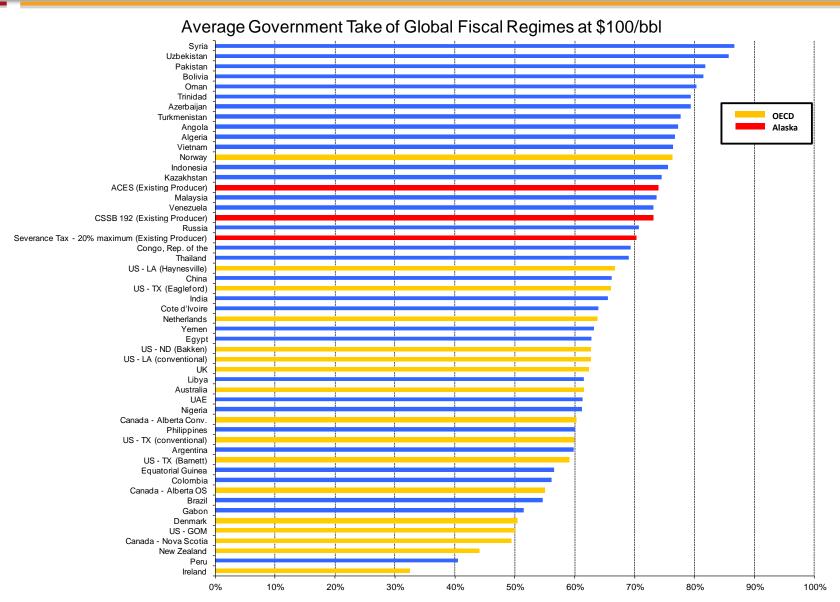




20 Year Revenue Impact of Reduced Rate for New Production



Regime Competitiveness: Relative Government Take (Existing Production)



Regime Competitiveness: Relative Government Take (New Development)



