ESTIMATED BUDGET EFFECTS OF THE REVENUE PROVISIONS CONTAINED IN THE HOUSE AMENDMENT TO THE SENATE AMENDMENT TO H.R. 1865, THE FURTHER CONSOLIDATED APPROPRIATIONS ACT, 2020 (RULES COMMITTEE PRINT 116-44)

Fiscal Years 2020 - 2029

[Millions of Dollars]

Provision	Effective	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2020-24	2020-29	
DIVISION M - BIPARTISAN AMERICAN MINERS														
The "Bipartisan American Miners Act of 2019"														
1. Reduction in minimum age for allowable in-service														
distributions	pyba 12/31/19	186	273	256	216	175	135	77	41	3	-37	1,105	1,325	
TOTAL OF DIVISION M, SECTION 104		186	273	256	216	175	135	77	41	3	-37	1,105	1,325	
DIVISION N - HEALTH AND HUMAN SERVICES EXTENDER	as.													
I. Health and Human Services Extenders														
E. Revenue Provisions														
1. Repeal of medical device excise tax	sa 12/31/19	-1,589	-2,202	-2,314	-2,431	-2,553	-2,679	-2,751	-2,864	-3,001	-3,145	-11,090	-25,529	
2. Repeal of 40% excise tax on high cost employer-sponsored														
health coverage [1][2]	tyba 12/31/19			-6,568	-14,474	-17,922	-22,105	-25,592	-31,506	-35,970	-42,828	-38,964	-196,966	
3. Repeal of annual fee on health insurance providers	cyba 12/31/20		-13,710	-14,535	-15,393	-16,271	-17,161	-17,003	-17,852	-18,732	-20,183	-59,908	-150,839	
TOTAL OF DIVISION N, TITLE I, SUBTITLE E		1,589	-15,912	-23,417	-32,298	-36,746	-41,945	-45,346	-52,222	-57,703	-66,156	-109,962	-373,334	
DIVISION O - SETTING EVERY COMMUNITY UP FOR RETI	REMENT													
ENHANCEMENT														
The "Setting Every Community Up for Retirement Enhancement ('SECURE') Act of 2019"														
I. Expanding and Preserving Retirement Savings														
Multiple employer plans and pooled employer	generally													
plans; reporting [3]	pyba 12/31/20	-29	-74	-161	-251	-342	-437	-511	-523	-541	-553	-857	-3,421	
2. Increase in 10-percent cap for automatic enrollment safe														
harbor after first plan year	pyba 12/31/19	12/31/19 Negligible Revenue Effect												
3. Rules relating to election of safe harbor 401(k)														
status	pyba 12/31/19					<i>N</i>	legligible I	Revenue Ef	fect					

Provision	Effective	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2020-24	2020-29
4. Increase in credit limitation for small employer plan													
start-up costs	tyba 12/31/19	-1	-3	-3	-3	-3	-3	-3	-3	-3	-3	-13	-29
5. Small employer automatic enrollment credit	tyba 12/31/19	[4]	[4]	[4]	-1	-1	-1	-1	-1	-1	-1	-2	-5
6. Certain taxable non-tuition fellowship and stipend	•												
payments treated as compensation for IRA purposes	tyba 12/31/19	[4]	[4]	[4]	[4]	[4]	[4]	[4]	-1	-1	-1	-1	-3
7. Repeal of maximum age for traditional IRA	•												
contributions	cadmf tyba 12/31/19	-4	-7	-9	-11	-13	-15	-16	-17	-18	-20	-44	-130
8. Qualified employer plans prohibited from making loans	•												
through credit cards and other similar arrangements	lma DOE					N	egligible R	evenue Effe	ect				
9. Portability of lifetime income options						N	egligible R	evenue Effe	ect				
10. Treatment of custodial accounts on termination of section	17						0 0	55					
403(b) plans	DOE [5]					N	egligible R	evenue Effe	ect				
11. Clarification of retirement income account rules relating	[0]						-00						
to church-controlled organizations	ybbo/a DOE					λ	leolioihle R	evenue Eff	ect				
12. Qualified cash or deferred arrangements must allow	Jood a BOE						csusion n	evenue 2jj	cci				
long-term employees working more than 500 but less													
than 1,000 hours per year to participate [6]	. [7]		-27	-41	-48	-54	-62	-80	-96	-105	-115	-170	-628
13. Penalty-free withdrawal and recontribution from	. [/]		-21	-71	10	-54	-02	-00	-70	-103	-113	-170	-020
retirement plans for birth of child or adoption													
(distributions limited to \$5,000 per individual) [8]	dma 12/31/19	-8	-23	-44	-69	-100	-134	-181	-193	-204	-215	-244	-1,171
	uma 12/31/19	-0	-23	-44	-09	-100	-134	-101	-193	-204	-213	-244	-1,1/1
14. Increase age of required beginning date for required	[0]	727	0.00	005	002	077	966	0.52	044	002	022	1.260	0.050
minimum distributions to 72	[9]	-737	-869	-885	-902	-877	-866	-953	-944	-903	-923	-4,269	-8,859
15. Special rules for minimum funding standards for	10/01/17	F1 13	F1.13	F1.13	F1 13	F1 13	1	2	2	2	2	F1.13	0
community newspaper plans [1][10]	pyea 12/31/17	[11]	[11]	[11]	[11]	[11]	1	2	2	2	2	[11]	9
16. Treating excluded difficulty of care payments as	DOE 0												
compensation for determining retirement contribution	ca DOE &		_										
limitations	pyba 12/31/15	-10	-7	-10	-15	-20	-25	-31	-37	-43	-51	-62	-249
Total of Expanding and Preserving Retirement Savings		-789	-1,010	-1,153	-1,300	-1,410	-1,542	-1,774	-1,813	-1,817	-1,880	-5,662	-14,486
II. Administrative Improvements													
1. Plan adopted by filing due date for year may be													
treated as in effect as of close of year	. paf tyba 12/31/19		-9	-10	-11	-12	-13	-14	-15	-15	-16	-41	-113
2. Combined annual report for group of	rrtbfwrt pyba 12/31/19 &	5											
plans	ararf pyba 12/31/21					N	egligible R	evenue Eff	ect				
3. Disclosure regarding lifetime income [12]	[13]						No Bud	get Effect -					
4. Fiduciary safe harbor for selection of lifetime income							Ì						
provider [12]	DOE						No Bud	get Effect -					
5. Modification of nondiscrimination rules to protect older,							Ì						
longer service participation	DOE					N	egligible R	evenue Eff	ect				
6. Modification of PBGC premiums for cooperative and small							5 0	33					
employer charity ("CSEC") plans [1][12]		-110	-114	-119	-124	-129	-134	-138	-144	-150	-156	-596	-1,318
Total of Administrative Improvements		-110	-123	-129	-135	-141	-147	-152	-159	-165	-172	-637	-1,431

Provision	Effective	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2020-24	2020-29
III. Other Benefits													
1. Benefits for volunteer firefighters and emergency medical													
responders (sunset 12/31/20) [15]	tyba 12/31/19	-25	-8									-34	-34
2. Expansion of section 529 plans	dma 12/31/18	-23	-19	-20	-20	-21	-21	-22	-23	-23	-24	-102	-215
Total of Other Benefits		-48	-27	-20	-20	-21	-21	-22	-23	-23	-24	-136	-249
IV. Revenue Provisions													
1. Modification of required distribution rules for													
designated beneficiaries	[16]	212	643	1,026	1,295	1,508	1,704	2,024	2,326	2,458	2,552	4,685	15,749
2. Increase in penalty for failure to file	rtddfwieia 12/31/19	1	4	4	4	4	4	4	4	5	5	16	39
3. Increased penalties for failure to file retirement plan													
returns	[17]	[4]	14	29	29	30	30	31	32	32	33	102	260
4. Increase information sharing to administer excise taxes	DOE	2	8	14	16	17	19	20	21	21	21	58	160
Total of Revenue Provisions		215	669	1,073	1,344	1,559	1,757	2,079	2,383	2,516	2,611	4,861	16,208
V. Tax Relief for Certain Children													
1. Modification of rules relating to the taxation of unearned	tyba 12/31/19 &												
income of certain children	tyba 12/31/17	-241	-83	-53	-35	-26	-21	-11				-437	-470
Total of Tax Relief for Certain Children		-241	-83	-53	-35	-26	-21	-11	0	0	0	-437	-470
VI. Administrative Provisions													
1. Provisions relating to plan amendments	[18] -					N	egligible R	evenue Eff	ect				
Total of Administrative Provisions						No	egligible R	evenue Eff	ect				
TOTAL OF DIVISION O - The "SECURE Act of 2019"		-973	-574	-282	-146	-39	26	120	388	511	535	-2,011	-428
DIVISION Q - REVENUE PROVISIONS The "Taxpayer Certainty and Disaster Tax Relief Act of 2019"													
 I. Extension of Certain Expiring Provisions A. Tax Relief and Support for Families and Individuals 1. Extension of exclusion from gross income of discharge of indebtedness on qualified principal residence (sunset 													
12/31/20)	doia 12/31/17	-1,617	-666									-2,283	-2,283
2. Extension of mortgage insurance premiums treated as qualified residence interest (sunset 12/31/20)	apoaa 12/31/17	-828	-426									-1,253	-1,253
3. Extension of medical expense deduction for expenses in excess of 7.5 percent of adjusted gross income (sunset 12/31/20)	tyea 12/31/18	-2,191	-1,439									-3,629	-3,629

Provision	Effective	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2020-24	2020-29
4. Extension of above-the-line deduction for qualified													
tuition and related expenses (sunset 12/31/20)	tyba 12/31/17	-489	-175									-664	-664
in amount of excise tax on coal (sunset 12/31/20) B. Incentives for Employment, Economic Growth, and Community Development	fdofcmba DOE	121	41									162	162
1. Extension of Indian employment tax credit (sunset	4.1. 12/21/17	1.41	-58									-199	-199
12/31/20)		-141											
12/31/22)	epoid tyba 12/31/17	-536	-216	-216	-97							-1,065	-1,065
12/31/20)	tyba 12/31/17	-3	-1	-1	-1	[4]	[4]	[4]				-6	-7
3-year property (sunset 12/31/20)	ppisa 12/31/17 -						- No Reven	ue Effect -					
entertainment complexes (sunset 12/31/20)	ppisa 12/31/17	-70	-41	-30	-21	-17	-13	-7	1	5	7	-179	-187
6. Extension of accelerated depreciation for business property on Indian reservations (sunset 12/31/20)	ppisa 12/31/17	-58	-31	-12	-3	-2	-4	-9	-12	-14	-14	-106	-159
Extension of special expensing rules for certain film, television, and live theatrical productions (sunset													
12/31/20)	pca 12/31/17	-1,686	579	846	242	[11]	[11]	[11]	[11]	[11]	[11]	-19	-18
12/31/20)	tyba 12/31/17	-590	-240	2	-2							-830	-830
credit (sunset 12/31/20)	tyba 12/31/17	-21	-4									-25	-25
C. Incentives for Energy Production, Efficiency, and Green Economy Jobs													
Biodiesel and renewable diesel incentives - extend present-law income tax credits, excise tax credit, and													
outlay payments (sunset 12/31/22)	fsoua 12/31/17	-8,121	-3,092	-3,124	-846							-15,183	-15,183
credit (sunset 12/31/20)	qsgbpa 12/31/17	-36	-7									-43	-43
Extension of credit for section 25C nonbusiness energy property (sunset 12/31/20)	ppisa 12/31/17	-375	-471									-846	-846
4. Extension of alternative motor vehicle credit for qualified fuel cell motor vehicles (sunset 12/31/20)	ppa 12/31/17	-12	-2									-14	-14
5. Extension of credit for alternative fuel vehicle				0	0	0	-						
refueling property (sunset 12/31/20)	ppisa 12/31/17	-200	-97	-9	-8	-8	-7	-4	-1	I	1	-323	-331
vehicles (sunset 12/31/20)	vaa 12/31/17	-2	-1	[4]	[4]	[4]						-3	-3
renewable resources (sunset 12/31/20)	1/1/18	-102	-185	-213	-161	-169	-208	-239	-258	-261	-263	-831	-2,060
(sunset 12/31/20) [19]	cpa 12/31/17	-59	-16	-9	-8	-8	-7	-4	-2	[4]	[4]	-100	-113

Provision	Effective	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2020-24	2020-29
9. Extension of credit for construction of energy-efficient													
new homes (sunset 12/31/20)	haa 12/31/17	-414	-119	-64	-56	-56	-45	-26	-7			-710	-78
generation biofuel plant property (sunset 12/31/20)	. ppisa 12/31/17					N	egligible Re	evenue Effe	ect				
deduction (sunset 12/31/20)	ppisa 12/31/17	-222	-25	5	4	4	3	3	2	2	1	-234	-2
 Extension of special rule for sales or dispositions to implement Federal Energy Regulatory Commission ("FERC") or State electric restructuring policy for qualified electric utilities (sunset 12/31/20) 	da 12/31/17	-423	2	78	78	78	78	62	36	10		-186	
 13. Extension and clarification of excise tax credits relating to alternative fuels (sunset 12/31/20): a. Alternative fuels mixture credit claims filed before 	da 12/51/17	123	2	70	70	70	70	02	30	10		100	
January 8, 2018 and subject to "no inference"	[21]					Se	ee Footnote	e [20] Belo	w				
b. For all other claims relating to alternative fuels		-1,795	-183									-1,978	-1,9
14. Extension of Oil Spill Liability Trust Fund financing rate (sunset 12/31/20)	. fdofcmba DOE						- No Reven	ue Effect -					
D. Certain Provisions Expiring at the End of 2019													
1. Extension of new markets tax credit (sunset 12/31/20) [22]	. cyba 12/31/19	[4]	-8	-37	-113	-173	-200	-226	-247	-248	-215	-332	-1,4
Extension of employer credit for paid family and medical leave (sunset 12/31/20) [23]	wpi tyba 12/31/19	-767	-803	-334	-167	-119	-48					-2,190	-2,2
3. Extension of work opportunity tax credit (sunset 12/31/20)		-571	-826	-289	-113	-86	-78	-32	-28	-16	-2	-1,885	-2,0
4. Extension of certain provisions related to beer, wine, and distilled spirits (sunset 12/31/20):	. 1wowited 12/31/17	371	020	207	113	00	70	32	20	10	2	1,000	2,0
Special rule for the production period for beer, wine, and distilled spirits	icpoaa 12/31/19	-27	5	5	5	4	-1	[4]	[4]	[4]	[4]	-8	
b. Modifying the rates of taxation of beer and certain other rules	. bra 12/31/19	-89	-35									-125	-1
c. Modifying the rates of taxation of wine and certain other rules		-123	-53									-176	-1
d. Modifying the rates of taxation of distilled spirits and												-170	-1
e. Simplification of rules regarding records, statements,	dsra 12/31/19	-426	-214									-640	-6
and returns	. cqba 12/31/19					No	egligible Re	evenue Effe	ect				
5. Extension of look-through treatment of payments	•						- 0	00					
between related CFCs under foreign personal holding company income rules (sunset 12/31/20)	[24]	-471	-202									-673	-(
6. Extension of credit for health insurance costs of eligible	[24]	-4 /1	-202									-0/3	-(
individuals (health coverage tax credit) (sunset													
12/31/20) [1]	mba 12/31/19	-28	-15									-43	-
Total of Extension of Certain Expiring Provisions		-22,372	-9,024	-3,402	-1,267	-552	-530	-482	-516	-521	-485	-36,619	-39,1

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Provision	Effective	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2020-24	2020-29
II. Disaster Tax Relief													
1. Special disaster-related rules for use of retirement													
funds	DOE	-211	-141	-66	-55	-11	[4]	[4]	[4]	[4]	[4]	-486	-486
2. Employee retention credit for employers affected by													
qualified disasters	[25]	-292	-21	-12	-5	[4]	[4]					-331	-331
3. Other disaster-related tax relief provisions:													
a. Temporary increase in limitation on qualified													
contributions	DOE	-4,250	1,848	685	422	273						-1,022	-1,022
b. Special rules for qualified disaster-related personal													
casualty losses	DOE	-4,940	-2,964	-1,482	-494	[4]	[4]	[4]	[4]	[4]	[4]	-9,880	-9,880
c. Special rule for determining earned income [1]	DOE	-237	-30									-268	-268
4. Automatic extension of filing deadlines in case of certain													
taxpayers affected by Federally declared disasters	Fddda DOE -					i	Negligible I	Revenue Ef	fect				
5. Modification of the tax rate for the excise tax on													
investment income of private foundations	tyba DOE -					i	Negligible I	Revenue Ef	fect				
6. Additional low-income housing credit allocation for													
qualified 2017 and 2018 California disaster areas	DOE	-2	-25	-65	-92	-99	-99	-99	-99	-99	-99	-283	-778
7. Treatment of certain possessions	DOE -					Estimo	ate Include	d in Items I	I.1 II.5				
Total of Disaster Tax Relief		-9,932	-1,333	-940	-224	163	-99	-99	-99	-99	-99	-12,270	-12,765
III. Other Provisions													
1. Modification of income for purposes of determining													
tax-exempt status of certain mutual or cooperative													
telephone or electric companies	tyba 12/31/17	-2	-2	-2	-2	-3	-3	-4	-5	-5	-6	-11	-34
2. Repeal of increase in unrelated business taxable income													
for certain fringe benefit expenses [26]	[27]	-177	-147	-157	-166	-176	-187	-197	-209	-220	-235	-822	-1,870
Total of Other Provisions		-179	-149	-159	-168	-179	-190	-201	-214	-225	-241	-833	-1,904
TOTAL OF DIVISION Q - The "Taxpayer Certainty and Disaste	er Tax												
Relief Act of 2019"		-32,483	-10,506	-4,501	-1,659	-568	-819	-782	-829	-845	-825	-49,722	-53,822
NET TOTAL		-34,860	-26,718	-27,943	-33,887	-37,178	-42,603	-45,931	-52,622	-58,034	-66,483	-160,589	-426,259

Joint Committee on Taxation

NOTE: Details may not add to totals due to rounding. The date of enactment is assumed to be prior to December 31, 2019.

Legend and Footnotes for JCX-54-19 R:

Legend for "Effective" column:

apoaa = amounts paid or accrued after

ararf = annual returns and reports for

bra = beer removed after

ca = contributions after

cadmf = contributions and distributions made for

cpa = coal produced after

cqba = calendar quarters beginning after

cyba = calendar years beginning after

da = dispositions after

dma = distributions made after

DOE = date of enactment

doia = discharge of indebtedness after

dsra = distilled spirits removed after

epoid = expenditures paid or incurred during

Fddda = Federally declared disasters declared after

fdofcmba = first day of first calendar month beginning after

fsoua = fuel sold or used after

haa = homes acquired after

icpoaa = interest costs paid or accrued after

iwbwftea = individuals who begin work for the

employer after

lma = loans made after

mba = months beginning after

paf = plans adopted for

pca = productions commencing after

ppa = property purchased after

ppisa = property placed in service after

pyba = plan years beginning after

pyea = plan years ending after

rrtbfwrt = returns required to be filed with

respect to

rtddfwieia = returns the due date for which

(including extensions) is after

 $qsgbpa = qualified\ second\ generation\ biofuel$

production after

sa = sales after

tyba = taxable years beginning after

tyea = taxable years ending after

vaa = vehicles acquired after

wpi = wages paid in

wra = wine removed after

ybbo/a = years beginning before, on, or after

[1] Estimates contain the following outlay effect:	2020	2021	2022	2023	<u>2024</u>	2025	<u>2026</u>	2027	2028	2029	2020-24	2020-29
Repeal of the 40% excise tax on high cost employer-sponsored health coverage			-241	-473	-499	-537	-432	-376	-462	-566	-1,213	-3,585
Modification of PBGC Premiums for Cooperative and Small Employer Charity												
("CSEC") Plans [12]	110	114	119	124	129	134	138	144	150	156	596	1,318
Special rules for minimum funding standards for community newspaper plans [10]	[28]	[28]	[28]	[28]	[28]	[28]	-1	-1	-1	-1	[28]	-4
Credit for health insurance costs of eligible individuals (health coverage tax credit)	26	9									35	35
Special rule for determining earned income	172	22									194	194
[2] Estimate includes the following budget effects:	<u>2020</u>	<u>2021</u>	2022	<u>2023</u>	<u>2024</u>	<u>2025</u>	2026	<u>2027</u>	<u>2028</u>	<u>2029</u>	<u>2020-24</u>	<u>2020-29</u>
Total Revenue Effect			-6,568	-14,474	-17,922	-22,105	-25,592	-31,506	-35,970	-42,828	-38,964	-196,966
On-budget effects			-4,972	-11,745	-14,445	-17,712	-21,011	-26,390	-29,929	-35,495	-31,163	-161,701
Off-budget effects			-1,596	-2,729	-3,476	-4,393	-4,581	-5,116	-6,041	-7,333	-7,801	-35,265
[3] Estimate includes the following budget effects:	<u>2020</u>	<u>2021</u>	<u>2022</u>	<u>2023</u>	<u>2024</u>	<u>2025</u>	<u>2026</u>	<u>2027</u>	2028	<u>2029</u>	<u>2020-24</u>	<u>2020-29</u>
Total Revenue Effect	-29	-74	-161	-251	-342	-437	-511	-523	-541	-553	-857	-3,421
On-budget effects	-26	-68	-148	-230	-315	-402	-469	-480	-497	-510	-787	-3,145
Off-budget effects	-2	-6	-13	-20	-28	-35	-42	-42	-43	-43	-70	-276
[4] Loss of less than \$500,000.												
[5] Guidance must apply for taxable years beginning after December 31, 2008.												
[6] Estimate includes the following budget effects:	<u>2020</u>	<u>2021</u>	2022	<u>2023</u>	<u>2024</u>	<u>2025</u>	2026	<u>2027</u>	<u>2028</u>	<u>2029</u>	2019-24	<u>2019-29</u>
Total Revenue Effect		-27	-41	-48	-54	-62	-80	-96	-105	-115	-170	-628
On-budget effects		-25	-38	-44	-50	-56	-73	-86	-95	-104	-155	-570
Off-budget effects		-2	-4	-4	-5	-6	-7	-10	-10	-11	-15	-58

[7] Generally effective for plan years beginning after December 31, 2020, except that for purposes of section 401(k)(2)(D)(ii), 12-month periods beginning before January 1, 2021, shall not be taken into account.

Footnotes for JCX-54-19 R continued:

[8] Estimate includes the following budget effects:	<u>2020</u>	<u>2021</u>	<u>2022</u>	2023	<u>2024</u>	<u>2025</u>	<u>2026</u>	<u>2027</u>	<u>2028</u>	<u>2029</u>	<u>2019-24</u>	2019-29
Total Revenue Effect	-8	-23	-44	-69	-100	-134	-181	-193	-204	-215	-244	-1,171
On-budget effects	-8	-22	-42	-66	-96	-129	-174	-186	-197	-207	-234	-1,127
Off-budget effects		-1	-2	-3	-4	-5	-7	-7	-7	-8	-10	-44

- [9] Effective for distributions required to be made after December 31, 2019, for employees and IRA owners who attain age 70 1/2 after December 31, 2019.
- [10] Estimate provided by the Joint Committee on Taxation and the Congressional Budget Office.
- [11] Gain of less than \$500,000.
- [12] Estimate provided by the Congressional Budget Office.
- [13] Effective with respect to benefit statements provided more than 12 months after the latest of the issuance by the Secretary of Labor of: (1) interim final rules, (2) the model disclosure, or (3) prescribed assumptions.
- [14] Effective upon enactment, applies for plan years beginning after December 31, 2018.

[15] Estimate includes the following budget effects:	<u>2020</u>	<u>2021</u>	<u>2022</u>	<u>2023</u>	<u>2024</u>	<u>2025</u>	<u>2026</u>	<u>2027</u>	<u>2028</u>	<u>2029</u>	2020-24	<u>2020-29</u>
Total Revenue Effect	-24	-8									-32	-32
On-budget effects	-15	-5									-20	-20
Off-budget effects	-9	-3									-12	-12

- [16] Generally effective for distributions with respect to employees who die after December 31, 2019.
- [17] Effective for returns, statements and notifications required to be filed, and withholding notices required to be provided, after December 31, 2019.
- [18] Retroactive amendments generally permitted beginning on effective date of each provision and ending on last day of first plan year beginning on or after January 1, 2022, or such later date as the Secretary of Treasury may prescribe; substituting 2024 for 2022 for governmental and, in certain circumstances, certain collectively bargained plans.
- [19] Estimate assumes additional years of credit eligibility. The placed-in-service sunset date is assumed to be unchanged at December 31, 2008.
- [20] Estimates exclude alternative fuel mixture credit claims involving mixtures of butane with gasoline, butane with propane, and butane with compressed natural gas ("at-issue alternative fuel mixture claims").

 The validity of claims filed for these mixtures is currently being litigated by taxpayers and the IRS, which published Revenue Ruling 2018-02 in the Internal Revenue Bulletin on January 8, 2018. The proposal here provides that "Nothing contained in this subsection or the amendments made by this subsection shall be construed to create any inference as to a change in law or guidance in effect prior to enactment of this subsection." Should taxpayers prevail in court against the IRS's position in Revenue Ruling 2018-02, we estimate that the potential payments of refunds from the Treasury for at-issue alternative fuel mixture claims to taxpayers would be \$8.4 billion. Even if the IRS position on mixtures of butane and gasoline prevails in court, payments for other at-issue alternative fuel mixtures claims may reduce Federal fiscal year budget receipts by as much as hundreds of millions of dollars.
- [21] Effective for fuel sold or used before the date of enactment and with claims for credit for such fuel filed before January 8, 2018.
- [22] Allocation in calendar year 2020 increased to \$5 billion.

[23] Estimate includes the following budget effects:	2020	2021	2022	2023	<u>2024</u>	2025	<u>2026</u>	<u>2027</u>	2028	2029	2020-24	2020-29
Total Revenue Effect	-767	-803	-334	-167	-119	-48					-2,190	-2,237
On-budget effects	-774	-805	-334	-167	-119	-48					-2,199	-2,246
Off-budget effects	7	3									9	9

- [24] Effective for taxable years of foreign corporations beginning after December 31, 2019, and for taxable years of U.S. shareholders with or within which such taxable years of such foreign corporations end.
- [25] For employers affected by qualified disasters, effective for wages paid or incurred from the date the trade or business became inoperable through the earlier of the date such trade or business resumed significant operations or 150 days after the last day of the incident period of the qualified disaster.

[26] Estimate includes the following budget effects:	<u>2020</u>	<u>2021</u>	<u>2022</u>	<u>2023</u>	<u>2024</u>	<u>2025</u>	<u>2026</u>	<u>2027</u>	<u>2028</u>	<u>2029</u>	2020-24	2020-29
Total Revenue Effect	-177	-147	-157	-166	-176	-187	-197	-209	-220	-235	-822	-1,870
On-budget effects	-166	-131	-139	-148	-156	-166	-175	-185	-195	-208	-740	-1,670
Off-budget effects	-11	-16	-18	-19	-20	-21	-22	-23	-25	-27	-82	-200

- [27] Effective as if included in the amendments made by section 13703 of Public Law 115-97.
- [28] Decrease in outlays of less than \$500,000.