

ESTIMATED REVENUE EFFECTS OF THE CHAIRMAN'S AMENDMENT IN THE NATURE OF A SUBSTITUTE TO
 THE "ENERGY POLICY TAX INCENTIVES ACT OF 2005,"
 SCHEDULED FOR MARKUP BY THE COMMITTEE ON FINANCE ON JUNE 16, 2005

Fiscal Years 2005 - 2015

[Millions of Dollars]

Provision	Effective	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2005-10	2005-15
I. Electricity Infrastructure														
1. Extend and modify section 45 credit through 12/31/08 [1].....	esfqfa 12/31/05	-1	-24	-111	-302	-491	-570	-602	-614	-617	-620	-626	-1,497	-4,577
2. Clean renewable energy bonds (\$1 billion aggregate issuance limitation through 12/31/08).....	bia 12/31/05	---	-9	-25	-43	-56	-60	-60	-60	-60	-60	-60	-193	-493
3. Treatment of certain income of electric cooperatives	tyba 12/31/06	---	---	-14	-24	-26	-29	-32	-34	-37	-39	-42	-93	-277
4. Dispositions of transmission property to implement FERC restructuring policy (applies to sales or dispositions completed prior to 1/1/08).....	DOE	-37	-105	-237	-73	43	43	44	45	82	150	64	-366	19
5. Credit for production from advanced nuclear power facilities.....	tyba DOE	---	---	---	---	---	---	---	---	-41	-83	-155	---	-278
6. Investment incentives for production of electricity and gasification from advanced clean coal.....	DOE	---	-38	-83	-155	-234	-324	-371	-363	-319	-219	-148	-834	-2,254
7. Clean energy bonds for certified coal property (\$1 billion aggregate issuance limitation through 12/31/10).....	bia 12/31/05	---	-7	-22	-35	-45	-50	-55	-60	-60	-60	-60	-159	-454
Total of Electricity Infrastructure		-38	-183	-492	-632	-809	-990	-1,076	-1,086	-1,052	-931	-1,027	-3,142	-8,314
II. Domestic Fossil Fuel Security														
1. Credit for investment in coke/cogeneration manufacturing facilities (sunset 12/31/09).....	ppisa 12/31/04	-8	-30	-33	-27	-19	-14	-11	-6	-2	[2]	---	-130	-150
2. Incentives to expand refining capacity:														
a. Temporary expensing for equipment used in the refining of liquid fuels (and allow pass through to coop patrons) [3].....	ppisa DOE	---	-22	-58	-268	-95	-735	-611	355	285	231	191	-1,178	-727
b. Pass through low sulfur diesel expensing to coop patrons	[4]	-42	-13	5	4	4	4	4	4	4	4	4	-37	-16
3. Enhanced oil recovery credit modification for new/expanded CO2 recoveries and deep gas wells (sunset 12/31/09).....	ppisa 12/31/05	---	-42	-85	-126	-204	-186	-180	-163	-145	-143	-143	-644	-1,416
4. Gas distribution property treated as 15-year MACRS property, no AMT conformity (sunset after 2007) [3].....	ppisa DOE	-1	-13	-43	-65	-63	-52	-42	-36	-39	-47	-51	-237	-452
Total of Domestic Fossil Fuel Security		-51	-120	-214	-482	-377	-983	-840	154	103	45	1	-2,226	-2,761
III. Conservation and Energy Efficiency														
1. Allowance of deduction for certain energy efficient commercial building property (sunset 12/31/09).....	ppisa DOE	-37	-138	-175	-203	-211	-62	16	14	12	10	8	-826	-766
2. Business credit for construction of new energy efficient homes (30% credit sunsets 12/31/07; 50% credit sunsets 12/31/09).....	hpa DOE	-23	-104	-181	-126	-80	-63	-49	-40	-30	-10	-3	-576	-706

Provision	Effective	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2005-10	2005-15
3. Incentive for certain energy efficient property used in business (HV/AC et al.) (sunset 12/31/08).....	ppisa DOE	-15	-45	-62	-74	-28	---	---	---	---	---	---	-223	-223
4. Credit for certain non-business energy property (HV/AC et al.) (sunset 12/31/08).....	ppisa 12/31/05	---	-69	-341	-352	-291	---	---	---	---	---	---	-1,053	-1,053
5. Energy credit for combined heat and power system property (sunset 12/31/07).....	ppisa DOE	-27	-72	-72	-42	-22	-15	-13	-8	-1	5	5	-249	-261
6. Credit for energy efficient appliances (sunsets 12/31/07 for dishwashers and 12/31/10 for clothes washers and refrigerators) [5].....	apa DOE	-8	-76	-86	-65	-41	-20	-5	---	---	---	---	-295	-300
7. 30% credit for residential purchases/installations of solar (pv and hot water) and fuel cells (sunset 12/31/09).....	ppisa 12/31/05	---	-2	-13	-21	-25	-24	---	---	---	---	---	-85	-85
8. Business tax incentives for qualifying fuel cells and microturbines (sunset 12/31/09 for fuel cells and 12/31/08 for microturbines)	ppisa 12/31/05	---	-17	-77	-157	-60	-34	-16	-13	14	12	8	-344	-339
9. Modify investment tax credit for solar energy (sunset 12/31/09).....	ppisa 12/31/05	---	-4	-7	-9	-9	-7	-6	-5	-5	-4	-3	-36	-59
Total of Conservation and Energy Efficiency		-110	-527	-1,014	-1,049	-767	-225	-73	-52	-10	13	15	-3,687	-3,792
IV. Alternative Motor Vehicles and Fuels Incentives														
1. Alternative motor vehicle credit (sunset 12/31/09 for hybrid vehicles, 12/31/10 for alternative fuel vehicles, and 12/31/14 for fuel cell vehicles).....	ppisa DOE	-3	-428	-362	-395	-420	-19	-11	-10	-13	-17	-8	-1,628	-1,686
2. Modification and extension of credit for electric vehicles (sunset 12/31/09).....	ppisa DOE	-4	-25	-35	-38	-40	-8	7	5	3	1	[6]	-149	-133
3. Credit for installation of alternative fueling stations credit for property placed in service before 1/1/10 (before 1/1/15 for hydrogen property).....	ppisa 12/31/05	[2]	-3	-8	-13	-21	-17	-8	-6	-3	-1	1	-62	-78
4. Credit for retail sale of and imposition of tax on alternative fuels [7]	fsa 9/30/06	---	---	-165	-180	-189	30	39	42	44	47	49	-505	-284
5. Extend excise tax provisions and income tax credit for biodiesel (credit sunset 12/31/10).....	DOE	---	---	-56	-88	-104	-120	-33	---	---	---	---	-368	-402
Total of Alternative Motor Vehicle Fuels Incentives		-7	-456	-626	-714	-774	-134	-6	31	31	30	42	-2,712	-2,583
V. Section 45 Technical Corrections	[8]	----- No Revenue Effect -----												
VI. Additional Energy Tax Incentives														
1. Underground gas storage facilities included in 10-year MACRS.....	ppisa DOE	-2	-7	-13	-18	-21	-23	-24	-25	-26	-27	-27	-83	-213
2. R&E tax credit for energy research (sunset 12/31/05).....	epoia DOE	-3	-10	-35	-21	-11	-8	-4	-1	---	---	---	-91	-92
3. Establish small agri-biodiesel producer credit and expand eligibility for small ethanol producer credit.....	tyea DOE	-1	-22	-24	-28	-31	-34	-25	-14	-11	-5	---	-141	-196
4. 15% tax credit for recycling equipment.....	tyba 12/31/05	---	-8	-12	-11	-11	-11	-10	-10	-10	-9	-9	-52	-99
5. Special rule for utility NOLs.....	[9]	[10]	-206	-142	-161	30	70	115	62	7	5	4	-409	-217
6. Provide a 15% credit for qualifying pollution control equipment at ethanol plants.....	ppisa DOE	[2]	-1	-2	-2	-1	[6]	[6]	[6]	[6]	[6]	[6]	-5	-5
7. Tax incentive for the production of Indian country coal (\$1.50/\$2.00) (sunset 12/31/12).....	pa 12/31/05	---	-11	-17	-18	-18	-18	-22	-24	-9	---	---	-83	-138

Provision	Effective	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2005-10	2005-15
8. Tax Incentive for the changeout of EPA non-compliant wood stoves (sunset 12/31/08).....	DOE	---	-1	-2	-2	-2	---	---	---	---	---	---	-7	-7
9. Exemption of bulk beds for farm crops from excise tax on heavy trucks and trailers.....	sa 9/30/05	[2]	[2]	-1	-1	-1	-1	-1	-1	-1	-1	-1	-2	-4
10. Conduct a study by the National Academy of Sciences of the health, environmental, security and infrastructure externalities associated with the use and production of energy.....	DOE	----- <i>No Revenue Effect</i> -----												
Total of Additional Energy Tax Incentives		-6	-266	-248	-262	-66	-25	29	-13	-50	-37	-33	-873	-971
VII. Provisions that Raise Revenue														
1. Provisions to combat fuel fraud:														
a. Treatment of kerosene used in aviation.....	[11]	---	48	49	50	50	50	50	50	50	49	49	247	495
b. Repeal of ultimate vendor refund claims with respect to farming.....	sa 9/30/05	---	[6]	[6]	[6]	[6]	[6]	[6]	[6]	[6]	[6]	[6]	[6]	[6]
c. Refunds of excise taxes on exempt sales of fuel by credit card.....	sa 12/31/05	----- <i>Negligible Revenue Effect</i> -----												
d. Additional requirement for exempt purchases.....	sa 12/31/05	---	3	4	4	4	4	4	5	5	5	5	19	43
e. Reregistration in event of change in ownership.....	aoftaa DOE	[6]	4	4	4	4	4	4	5	5	5	5	21	45
f. Registration of deep-draft vessels.....	DOE	[6]	3	3	3	3	3	3	3	3	3	3	14	31
g. Reconciliation of on-loaded cargo to entered cargo.....	DOE	---	[6]	4	4	4	4	4	5	5	5	5	17	41
h. Taxation of gasoline blendstocks and kerosene.....	feora 9/30/05	---	101	106	110	114	117	120	123	126	130	133	548	1,180
i. Nonapplication of export exemption to delivery of fuel to motor vehicles removed from the United States.....	sodma DOE	----- <i>No Revenue Effect</i> -----												
j. Penalty with respect to certain adulterated fuels.....	tsohofsoa DOE	----- <i>Negligible Revenue Effect</i> -----												
2. Re-impose oil spill trust fund tax (sunset 12/31/14).....	[12]	---	---	153	259	282	285	290	293	298	303	76	980	2,239
3. Extend and expand leaking underground storage tank trust fund tax to include all dyed fuels taxes.....	feora 12/31/05 [13]	---	21	29	29	30	30	30	30	30	31	31	139	292
4. Refinery reporting.....	ppisa DOE	----- <i>Negligible Revenue Effect</i> -----												
Total of Provisions that Raise Revenue		[6]	180	352	463	491	497	505	514	522	531	307	1,985	4,366
NET TOTAL		-212	-1,372	-2,242	-2,676	-2,302	-1,860	-1,461	-452	-456	-349	-695	-10,655	-14,055

Joint Committee on Taxation

NOTE: Details may not add to totals due to rounding. Date of enactment is assumed to be August 1, 2005

Legend for "Effective" column:

- | | | |
|--|--|---|
| apa = appliances produced after | feora = fuel entered or removed after | sodma = sales or deliveries made after |
| aoftaa = actions, or failures to act, after | fsa = fuel sold after | tsohofsoa = transfer, sale, or holding out for sale occurring after |
| bia = bonds issued after | hpa = homes purchased after | tyba = taxable years beginning after |
| DOE = date of enactment | pa = production after | tyea = taxable years ending after |
| epoia = expenses paid or incurred after | ppisa = property placed in service after | |
| esfqfa = electricity sold from qualifying facilities after | sa = sales after | |

[1] Estimates include interaction effect with the clean energy bond provision (item I.2.).
 [2] Loss of less than \$500,000.
 [3] Excluding assets subject to binding contracts on June 14, 2005 and is restricted to original-use property.

Footnotes for JCX-47-05 continued:

- [4] Effective for expenses qualifying for the deduction under section 179B.
- [5] Estimate is based upon proposed Energy Star standards for 2007 and indeterminate Energy Star standards for 2010.
- [6] Gain of less than \$500,000.
- [7] The credit generally expires September 30, 2009. However, for hydrogen, the credit expires after December 31, 2014.
- [8] Effective as if included in the American Jobs Creation Act of 2004.
- [9] Effective for net operating losses generated in tax years ending in 2003, 2004, and 2005.
- [10] Negligible revenue effect.
- [11] Effective for fuels or liquids removed, entered into the United States, or sold after September 30, 2005.
- [12] The tax applies on April 1, 2007, or if later, the last day of any calendar quarter for which the Secretary estimates that, as of the close of that quarter, the unobligated balance in the Oil Spill Liability Trust fund is less than \$2 billion.
- [13] Extension of trust fund is effective on October 1, 2005.