

House Resources Committee

Alaska Fiscal System Discussion Slides

March 25 2013 Janak Mayer Manager, Upstream PFC Energy



ACES and SB21: Issues and Aims

ACES - Issues	SB21 - Aims
High Government Take and high degree of progressivity means uncompetitive for investment at current prices	Overall neutrality at a competitive level of Government Take, while further improving competitiveness for new projects
 Credits create significant downside exposure to state in low price environments, for high cost projects, and projects not on state lands 	Limit downside risk to state from credits
 "Buydown" effect means incremental and standalone economics very different – with very different impacts for incumbent vs new producer 	 Balance system with even impacts for incumbent vs new producer
High marginal rates mean little incentive for producer efficiency	 Neutral regime creates low, constant marginal rates – strong incentive for producer efficiency
Complex system, with often counter-intuitive effects	Simplify the fiscal system

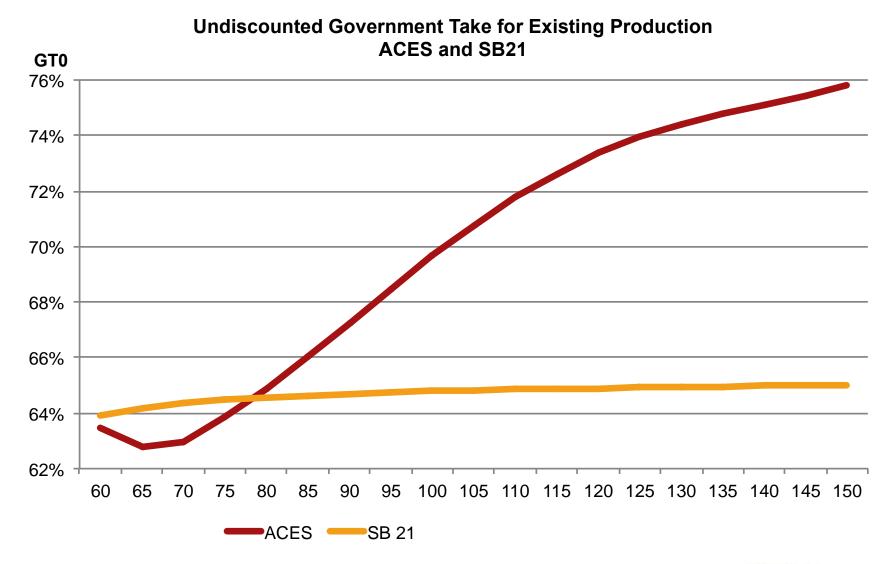


ACES and SB21: Key Changes

	ACES	SB21
Base Tax Rate	25%	35%
Progressivity	0.4 % per dollar of per barrel-PTV from \$30 to \$92.50; 0.1% per dollar of per barrel-PTV above \$92.50	None – although \$/bbl allowance creates an implicit 'reverse' progressivity that counteracts regressive nature of royalty, leading to overall neutrality
Maximum Tax Rate	75%	35%
Incentives for New Production	None	Gross Revenue Exclusion (GRE): In calculating the PTV, a producer's 20% of gross revenues from eligible production are excluded. Oil is from new PA, PA expansions, and areas in legacy fields not previously contributing to production.
\$/bbl Allowance	None	\$5
Capital Credit	20% of all qualified capital expenditures	Eliminated after Dec 31 for North Slope
NOL Credit	25% for Carry-Forward Annual Loss Credit, monetizable for small producer over 2 years	35% for Carry-Forward Annual Loss Credit, monetizable for small producer over one year
Small Producer Credit	Expires 2016	Expires 2016
Exploration Credit	Expires 2016	Expires 2016

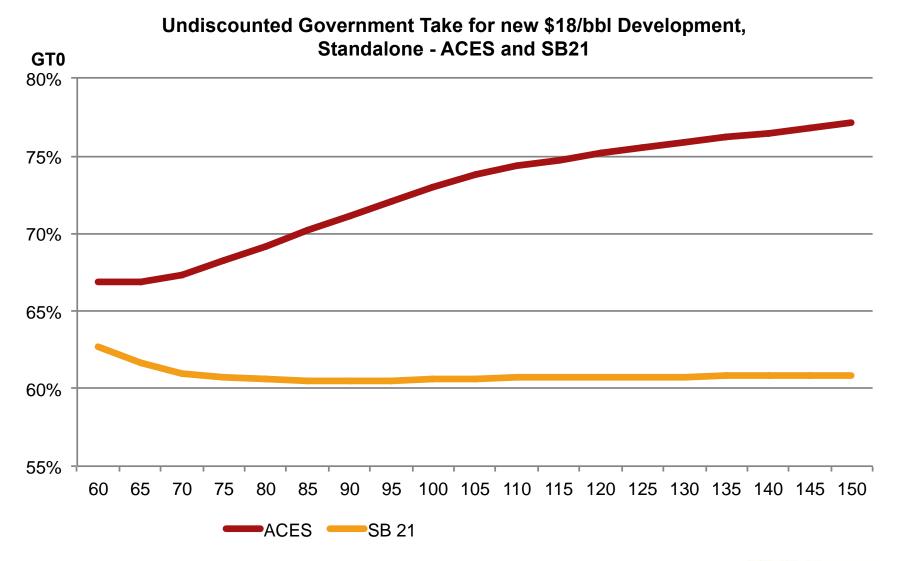


ACES and SB21: Government Take Comparison Base Production



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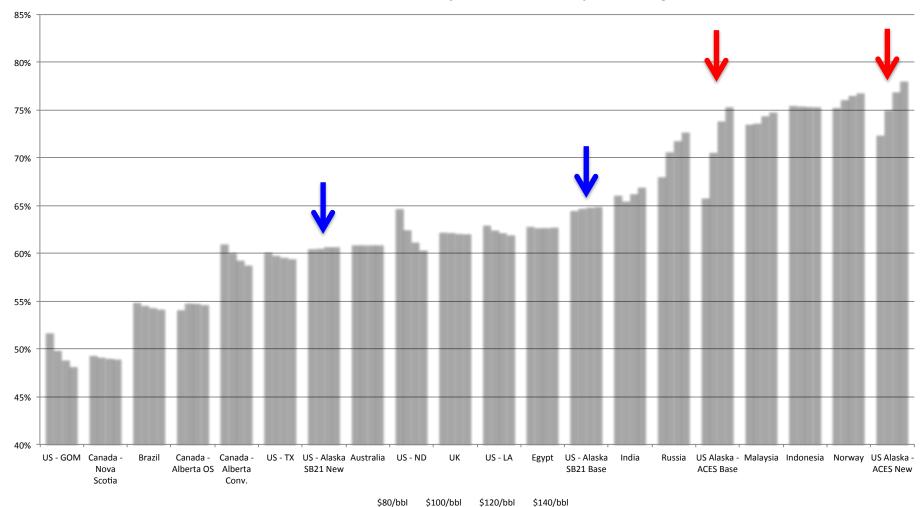
ACES and SB21: Government Take Comparison \$18/bbl New Development, Standalone



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Government Take Competitiveness



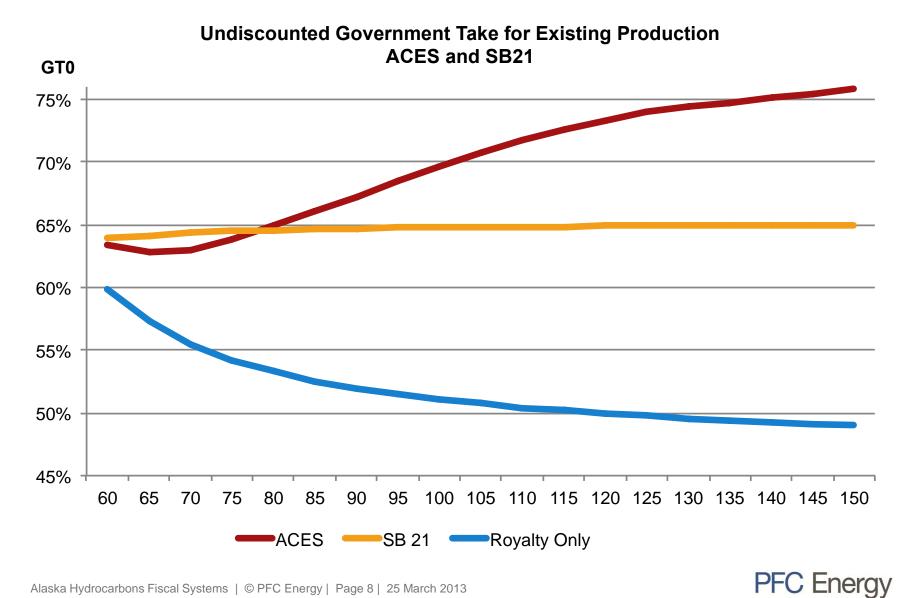
Alaska Government Take Competitiveness - Comparable Regimes

Regressive and Progressive Regimes

- 2 potential reasons to desire a progressive element in Alaska's fiscal regime:
 - To counteract regressive elements in the regime to achieve something close to **neutrality**
 - To go beyond neutrality, to ensure a higher level of take for the state in high price environments
- Regressive and Progressive regimes imply a very different outlooks on risk and reward, for government and the private sector:
 - Regressive regimes limit risk to the state, placing large downside risk on the private sector, protecting the state in low price or high cost environments
 - In return, regressive regimes offer outsized returns in high price environments
 - Progressive regimes involve the state bearing more price and cost risk, in return for a higher share of returns in good times
- Perhaps the single biggest problem with Alaska's current fiscal regime is that it involves elements that are **both strongly regressive and strongly progressive**.
 - It seeks to place downside risk on the private sector, while taking most of the returns in high price environments.
 - It is this combination that makes it particularly unattractive from an investment perspective



Regressvity, Progressivity, Neutrality

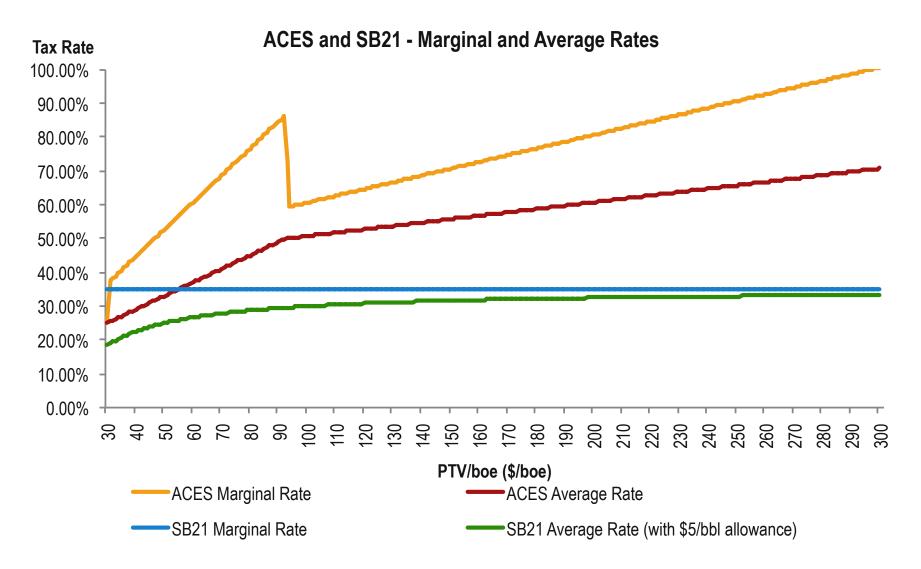


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\$5 production allowance is like reverse progressivity, to counteract effect of royalty

Taxable Production	50,000,000	50,000,000	50,000,000	50,000,000
ANS West Coast Transportation	60 10	80 10	120 10	140 10
Gross Value at Point of Production Lease Expenditures	2,500,000,000 1,500,000,000	3,500,000,000 1,500,000,000	5,500,000,000 1,500,000,000	6,500,000,000 1,500,000,000
GVPP/bbl Lease Expenditures / bbl	50 30	70 30	110 30	130 30
PTV PTV/bbl Production Tax without Allowance	1,000,000,000 20 350,000,000	2,000,000,000 40 700,000,000	4,000,000,000 80 1,400,000,000	5,000,000,000 100 1,750,000,000
Production Allowance	250,000,000	250,000,000	250,000,000	250,000,000
Production Tax	100,000,000	450,000,000	1,150,000,000	1,500,000,000
Nominal Tax Rate Rate after Allowance Progressive Tax Rate Deduction Alaska Hydrocarbons Fiscal Systems © PFC Ener	35% 10.0% 25.0% gy Page 9 25 March 201	35% 22.5% 12.5%	35% 28.8% 6.3%	35% 30.0% 5.0% PFC Energy

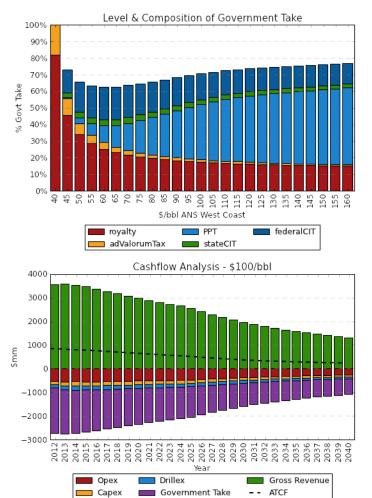
Marginal and Average Rates



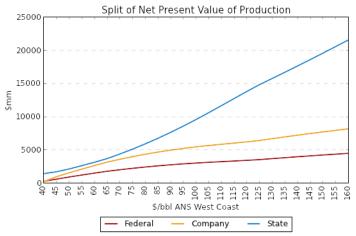
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ACES – Base Production



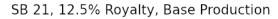
ACES, 12.5% Royalty, Base Production

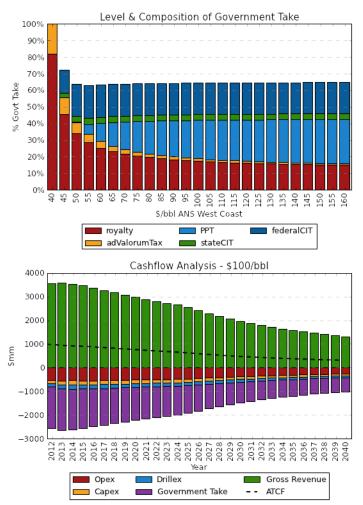


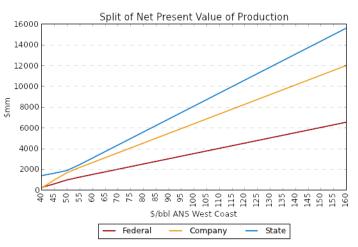
Economic Summary

	GT0	NPV/boe	IRR	Cash Margin
\$80/bbl	65.89%	4.18		19.04
\$100/bbl	70.65%	5.26		23.92
\$120/bbl	73.92%	6.0		27.09
\$140/bbl	75.46%	6.97		31.89

SB21 Base Production







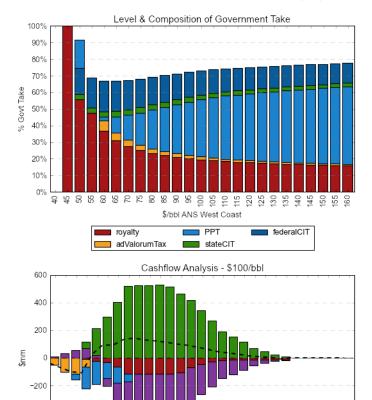
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Economic	Summary

	GT0	NPV/boe	IRR	Cash Margin
\$80/bbl	64.22%	4.37		19.77
\$100/bbl	64.54%	6.18		28.11
\$120/bbl	64.71%	8.0		36.45
\$140/bbl	64.81%	9.82		44.78

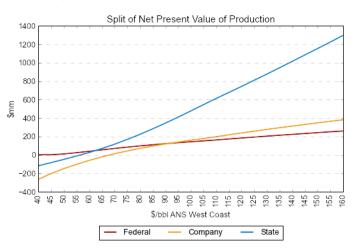
GRE increases the price level at which production tax, and 'progressivity', apply

Taxable Production		50,000,000	50,000,000	50,000,000	50,000,000
ANS West Coast		60	80	120	140
Transportation		10	10	10	10
Gross Value at Point of Production		2,500,000,000	3,500,000,000	5,500,000,000	6,500,000,000
Lease Expenditures		1,500,000,000	1,500,000,000	1,500,000,000	1,500,000,000
GVPP/bbl	30	50	70	110	130
Lease Expenditures / bbl		30	30	30	30
PTV before GRE		1,000,000,000	2,000,000,000	4,000,000,000	5,000,000,000
Prod tax without GRE		350,000,000	700,000,000	1,400,000,000	1,750,000,000
GRE	30%	750,000,000	1,050,000,000	1,650,000,000	1,950,000,000
PTV		250,000,000	950,000,000	2,350,000,000	3,050,000,000
PTV/bbl		20	40	80	100
Production Tax without Allowance		87,500,000	332,500,000	822,500,000	1,067,500,000
Production Allowance	\$ 5.00	250,000,000	250,000,000	250,000,000	250,000,000
Production Tax		-	82,500,000	572,500,000	817,500,000
Nominal Tax Rate Rate after Allowance and GRE Progressive Tax Rate Deduction Alaska Hydrocarbons Fiscal Systems © PFC	35% Energy Page 13	35% 0.0% 35.0% 3 25 March 2013	35% 4.1% 30.9%	35% 14.3% 20.7%	35% 16.4% 18.7% FC Energy

ACES - \$18/bbl New Development, Standalone



ACES, 12.5% Royalty, \$18/bbl New Development, Standalone



	GT0	NPV/boe	IRR	Cash Margin
\$80/bbl	69.25%	1.44	16.15%	22.21
\$100/bbl	73.03%	3.21	20.95%	27.06
\$120/bbl	75.13%	4.78	24.84%	30.63
\$140/bbl	76.52%	6.27	28.18%	34.71



2025 2026 2027 2028 2029 2029 2030

Year

2024

Government Take

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2032 2033 2034 2035

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Gross Revenue

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-600

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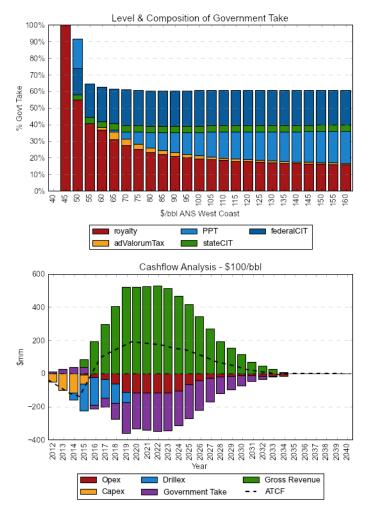
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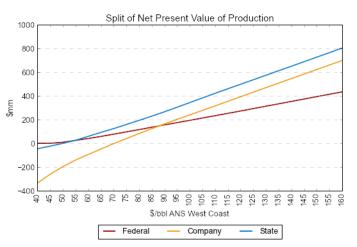
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CS SB21 \$18/bbl New Development, Standalone, with GRE







Economic	Summary
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	GT0	NPV/boe	IRR	Cash Margin
\$80/bbl	60.56%	1.67	15.83%	26.56
\$100/bbl	60.60%	4.83	22.23%	35.76
\$120/bbl	60.76%	7.89	27.63%	44.59
\$140/bbl	60.81%	10.95	32.47%	53.36

Credits – NOL, Exploration & Small Producer

- Impact of ACES on project economics is very different for an incumbent vs a new producer
 - At current prices, incumbent experiences experiences impact of 'buydown' effect, with new spending reducing tax rate from levels above 25% (plus also impact of capital credit)
 - New producer receives only impact of 25% NOL credit (plus capital credit)
- Fully monetizable NOL credit for small producers evens this playing field
 - All producers receive effective 35% government support for spending, whether new or incumbent
 - Flat, low marginal rate maintains strong incentive for efficiencies and cost control
 - No undue exposure to the state from higher cost projects at low prices
- Aim is to even the playing field and limit the level of support for exploration as well as other forms of spending
 - Allowing the Exploration credit to sunset, but having the fully monetizable 35% NOL credit means 35% government support for exploration spending
 - Again, even impact between incumbent vs new producer
- When the impacts of the system are even between incumbent vs new producer, strong argument that extending 'small producer' credit is less warranted
- Overall impact is to significantly simplify the system Alaska Hydrocarbons Fiscal Systems | © PFC Energy | Page 16 | 25 March 2013

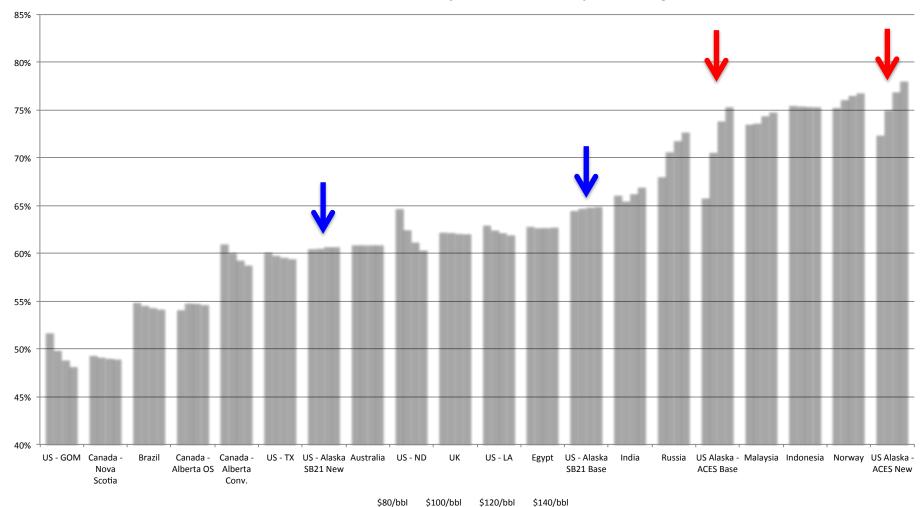


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Government Take Competitiveness



Alaska Government Take Competitiveness - Comparable Regimes

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