
THE GENERAL ASSEMBLY OF PENNSYLVANIA

SENATE BILL

No. 887 Session of
2021

INTRODUCED BY TARTAGLIONE, FONTANA, COLLETT, STREET,
SANTARSIERO, BREWSTER, KANE, HUGHES AND CAPPELLETTI,
OCTOBER 6, 2021

REFERRED TO FINANCE, OCTOBER 6, 2021

AN ACT

1 Amending the act of March 4, 1971 (P.L.6, No.2), entitled "An
2 act relating to tax reform and State taxation by codifying
3 and enumerating certain subjects of taxation and imposing
4 taxes thereon; providing procedures for the payment,
5 collection, administration and enforcement thereof; providing
6 for tax credits in certain cases; conferring powers and
7 imposing duties upon the Department of Revenue, certain
8 employers, fiduciaries, individuals, persons, corporations
9 and other entities; prescribing crimes, offenses and
10 penalties," in corporate net income tax, further providing
11 for definitions, for imposition of tax, for reports and
12 payment of tax and for consolidated reports; and, in general
13 provisions, further providing for underpayment of estimated
14 tax.

15 The General Assembly of the Commonwealth of Pennsylvania
16 hereby enacts as follows:

17 Section 1. Section 401(3)1(a), (b), (t) and (5) of the act
18 of March 4, 1971 (P.L.6, No.2), known as the Tax Reform Code of
19 1971, are amended, (3)2(a) (9) (A) is amended by adding a unit,
20 (3)1 and (3)4 are amended by adding phrases and the section is
21 amended by adding clauses to read:

22 Section 401. Definitions.--The following words, terms, and
23 phrases, when used in this article, shall have the meaning

1 ascribed to them in this section, except where the context
2 clearly indicates a different meaning:

3 * * *

4 (3) "Taxable income." 1. (a) In case the entire business
5 of the corporation is transacted within this Commonwealth, for
6 any taxable year which begins on or after January 1, 1971,
7 taxable income for the calendar year or fiscal year as returned
8 to and ascertained by the Federal Government before special
9 deductions provided for in sections 241, 242, 243, 244, 245,
10 246, 247, 248, 249 and 250 of the Internal Revenue Code of 1986
11 (26 U.S.C. §§ 241, 242, 243, 244, 245, 246, 247, 248, 249 and
12 250), or in the case of a corporation participating in the
13 filing of consolidated returns to the Federal Government or that
14 is not required to file a return with the Federal Government,
15 the taxable income which would have been returned to and
16 ascertained by the Federal Government before special deductions
17 provided for in sections 241, 242, 243, 244, 245, 246, 247, 248,
18 249 and 250 of the Internal Revenue Code of 1986 (26 U.S.C. §§
19 241, 242, 243, 244, 245, 246, 247, 248, 249 and 250) if separate
20 returns had been made to the Federal Government for the current
21 and prior taxable years, subject, however, to any correction
22 thereof, for fraud, evasion, or error as finally ascertained by
23 the Federal Government.

24 (b) Additional deductions shall be allowed from taxable
25 income on account of any dividends received from any other
26 corporation but only to the extent that such dividends are
27 included in taxable income as returned to and ascertained by the
28 Federal Government. For tax years beginning on or after January
29 1, 1991, additional deductions shall only be allowed for amounts
30 included, under section 78 of the Internal Revenue Code of 1986

1 (Public Law 99-514, 26 U.S.C. § 78), in taxable income returned
2 to and ascertained by the Federal Government and for the amount
3 of any dividends received from a foreign corporation included in
4 taxable income to the extent such dividends would be deductible
5 in arriving at Federal taxable income if received from a
6 domestic corporation. For taxable years beginning after December
7 31, 2021, the additional deduction with respect to dividends
8 shall not be allowed for dividends between members of a unitary
9 group.

10 * * *

11 (p.1) For taxable years after December 31, 2021, in the case
12 of a corporation that is a member of a unitary business, the
13 term "taxable income" shall mean the combined unitary income of
14 the unitary business, as determined on a water's-edge basis.

15 * * *

16 (t) (1) Except as provided in paragraph (2), (3) or (4) for
17 taxable years beginning after December 31, 2014, and in addition
18 to any authority the department has on the effective date of
19 this paragraph to deny a deduction related to a fraudulent or
20 sham transaction, no deduction shall be allowed for an
21 intangible expense or cost, or an interest expense or cost,
22 paid, accrued or incurred directly or indirectly in connection
23 with one or more transactions with an affiliated entity. In
24 calculating taxable income under this paragraph, when the
25 taxpayer is engaged in one or more transactions with an
26 affiliated entity that was subject to tax in this Commonwealth
27 or another state or possession of the United States on a tax
28 base that included the intangible expense or cost, or the
29 interest expense or cost, paid, accrued or incurred by the
30 taxpayer, the taxpayer shall receive a credit against tax due in

1 this Commonwealth in an amount equal to the apportionment factor
2 of the taxpayer in this Commonwealth multiplied by the greater
3 of the following:

4 (A) the tax liability of the affiliated entity with respect
5 to the portion of its income representing the intangible expense
6 or cost, or the interest expense or cost, paid, accrued or
7 incurred by the taxpayer; or

8 (B) the tax liability that would have been paid by the
9 affiliated entity under subparagraph (A) if that tax liability
10 had not been offset by a credit.

11 The credit issued under this paragraph shall not exceed the
12 taxpayer's liability in this Commonwealth attributable to the
13 net income taxed as a result of the adjustment required by this
14 paragraph.

15 (2) The adjustment required by paragraph (1) shall not apply
16 to a transaction that did not have as [the] a principal purpose
17 the avoidance of tax due under this article and was done at
18 arm's length rates and terms.

19 (3) The adjustment required by paragraph (1) shall not apply
20 to a transaction between a taxpayer and an affiliated entity
21 domiciled in a foreign nation which has in force a comprehensive
22 income tax treaty with the United States providing for the
23 allocation of all categories of income subject to taxation, or
24 the withholding of tax, on royalties, licenses, fees and
25 interest for the prevention of double taxation of the respective
26 nations' residents and the sharing of information.

27 (4) The adjustment required by paragraph (1) shall not apply
28 to a transaction where an affiliated entity directly or
29 indirectly paid, accrued or incurred a payment to a person who
30 is not an affiliated entity, if the payment is paid, accrued or

1 incurred on the intangible expense or cost, or interest expense
2 or cost, and is equal to or less than the taxpayer's
3 proportional share of the transaction. The taxpayer's
4 proportional share shall be based on relative sales, assets,
5 liabilities or another reasonable method.

6 (5) The adjustment required under paragraph (1) shall not
7 apply to a transaction between the taxpayer and an affiliated
8 entity, where the taxpayer and the affiliated entity file a
9 combined annual report in this State.

10 2. In case the entire business of any corporation, other
11 than a corporation engaged in doing business as a regulated
12 investment company as defined by the Internal Revenue Code of
13 1986, is not transacted within this Commonwealth, the tax
14 imposed by this article shall be based upon such portion of the
15 taxable income of such corporation for the fiscal or calendar
16 year, as defined in subclause 1 hereof, and may be determined as
17 follows:

18 (a) Division of Income.

19 * * *

20 (9) (A) Except as provided in subparagraph (B):

21 * * *

22 (vi) (a) For taxable years beginning after December 31,
23 2021, all business income of a unitary business shall be
24 apportioned to this State by multiplying the income by the
25 member's sales factor, the numerator of which shall be the
26 member's total sales in this State, and the denominator of which
27 shall be the combined total sales of all members of the unitary
28 business everywhere. In computing the sales of each member for
29 purposes of apportionment, the following sales are excluded from
30 the numerator and denominator:

1 (I) sales from transactions between or among members of the
2 unitary business that are deferred under 26 CFR 1.1502-13
3 (relating to intercompany transactions) for Federal taxable
4 income purposes; and

5 (II) the sales of each member that are excluded from the
6 unitary business pursuant to the definition of water's-edge
7 basis.

8 (b) The Pennsylvania sales of each nontaxable member shall
9 be determined based upon the apportionment rules applicable to
10 the member and shall be aggregated. Each taxable member of the
11 group shall include in its sales factor numerator a portion of
12 the aggregate Pennsylvania sales of nontaxable members based on
13 a ratio, the numerator of which is the taxable member's
14 Pennsylvania sales and the denominator of which is the aggregate
15 Pennsylvania sales of all the taxable members of the group.

16 (c) Nonbusiness income of each member of a unitary business
17 shall be allocated as provided in paragraphs (5) through (8) of
18 phrase (a) of subclause 2 of this definition. A member of the
19 unitary business is subject to tax on its apportioned share of
20 all business income of the unitary business, plus its
21 nonbusiness income or loss allocated to this State, minus the
22 member's net loss deduction.

23 (d) The Secretary of Revenue has the authority to
24 distribute, apportion or allocate gross income, deductions,
25 credits or allowances between and among two or more
26 corporations, persons, entities, members or unitary businesses,
27 whether or not incorporated, whether or not organized in the
28 United States and whether or not affiliated, if:

29 (I) the corporations, persons, entities, members or unitary
30 businesses are owned or controlled directly or indirectly by the

1 same interests within the meaning of section 482 of the Internal
2 Revenue Code (26 U.S.C. § 482); and

3 (II) the Secretary of Revenue determines that the
4 distribution, apportionment or allocation is necessary in order
5 to reflect an arm's length standard within the meaning of 26 CFR
6 1.482-1 (relating to allocation of income and deductions among
7 taxpayers) and to reflect clearly the income of those
8 corporations, persons, entities, members or unitary businesses.

9 (e) The Secretary of Revenue shall apply the administrative
10 and judicial interpretations of section 482 of the Internal
11 Revenue Code (26 U.S.C. § 482) in administering this section.

12 (f) For taxable years beginning after December 31, 2021, any
13 member of a unitary group that would otherwise apportion its
14 business income under phrase (b), (c), (d) or (e) of subclause 2
15 of this definition shall determine its apportionment formula
16 using a single sales fraction.

17 * * *

18 4. * * *

19 (h) Subject to the limitations of this subclause, any member
20 of a unitary business that has unused net loss from taxable
21 years that began prior to January 1, 2022, or that generates net
22 losses while a member of a unitary business may only take the
23 net loss deduction for taxable years beginning after December
24 31, 2021, to the extent of the member's share of combined
25 unitary income after apportionment and the net losses may not be
26 used by other members of the same unitary business.

27 (i) Any net loss realized for a taxable year unused by a
28 corporation which subsequently becomes a member of another
29 unitary business, may only be used by that corporation.

30 * * *

1 (5) "Taxable year." [The taxable year which the
2 corporation, or any consolidated group with which the
3 corporation participates in the filing of consolidated returns,
4 actually uses in reporting taxable income to the Federal
5 Government. With regard to the tax imposed by Article IV of this
6 act (relating to the Corporate Net Income Tax), the terms
7 "annual year," "fiscal year," "annual or fiscal year," "tax
8 year" and "tax period" shall be the same as the corporation's
9 taxable year, as defined in this paragraph.]

10 1. Except as set forth in subclause 2, the taxable year
11 which the corporation, or any consolidated group with which the
12 corporation participates in the filing of consolidated returns,
13 actually uses in reporting taxable income to the Federal
14 Government, or which the corporation would have used in
15 reporting taxable income to the Federal Government had it been
16 required to report its taxable income to the Federal Government.
17 With regard to the tax imposed by Article IV, the terms "annual
18 year," "fiscal year," "annual or fiscal year," "tax year" and
19 "tax period" shall be the same as the corporation's taxable
20 year, as defined in this subclause or subclause 2.

21 2. All members of a unitary business shall have a common
22 taxable year for purposes of computing tax due under this
23 article. The taxable year for such purposes is the common
24 taxable year adopted, in a manner prescribed by the department,
25 by all members of the unitary business. The common taxable year
26 must be used by all members of the unitary business in the year
27 of adoption and all future years unless otherwise permitted by
28 the department.

29 * * *

30 (11) "Tax haven." Means any of the following:

- 1 (A) Andorra.
- 2 (B) Anguilla.
- 3 (C) Antigua and Barbuda.
- 4 (D) Aruba.
- 5 (E) The Bahamas.
- 6 (F) Bahrain.
- 7 (G) Barbados.
- 8 (H) Belize.
- 9 (I) Bermuda.
- 10 (J) The British Virgin Islands.
- 11 (K) The Cayman Islands.
- 12 (L) The Cook Islands.
- 13 (M) Cyprus.
- 14 (N) Dominica.
- 15 (O) Gibraltar.
- 16 (P) Grenada.
- 17 (Q) Guernsey-Sark-Alderney.
- 18 (R) The Isle of Man.
- 19 (S) Jersey.
- 20 (T) Liberia.
- 21 (U) Liechtenstein.
- 22 (V) Luxembourg.
- 23 (W) Malta.
- 24 (X) The Marshall Islands.
- 25 (Y) Mauritius.
- 26 (Z) Monaco.
- 27 (AA) Montserrat.
- 28 (BB) Nauru.
- 29 (CC) Netherlands Antilles.
- 30 (DD) Niue.

1 (EE) Panama.

2 (FF) Samoa.

3 (GG) San Marino.

4 (HH) Seychelles.

5 (II) St. Kitts and Nevis.

6 (JJ) St. Lucia.

7 (KK) St. Vincent and the Grenadines.

8 (LL) Turks and Caicos Islands.

9 (MM) Vanuatu.

10 (NN) A jurisdiction that is identified as a tax haven by the
11 Organization for Economic Co-operation and Development.

12 (12) "Unitary business." A single economic enterprise that
13 is made up of separate parts of a single corporation, of a
14 commonly controlled group of corporations, or both, that are
15 sufficiently interdependent, integrated and interrelated through
16 their activities so as to provide a synergy and mutual benefit
17 that produces a sharing or exchange of value among them and a
18 flow of value to the separate parts. A unitary business includes
19 all those parts and corporations that are included in a unitary
20 business under the Constitution of the United States.

21 (13) "Water's-edge basis." A system of reporting that
22 includes the income and apportionment factors of certain members
23 of a unitary business, described as follows:

24 (A) Any member incorporated in the United States or formed
25 under the laws of any state of the United States, the District
26 of Columbia, any territory or possession of the United States or
27 the Commonwealth of Puerto Rico.

28 (B) Any member, regardless of the place incorporated or
29 formed, if at least twenty per cent of the member's sales factor
30 is within the United States, and the following shall apply:

1 (i) For purposes of determining whether at least twenty per
2 cent of a member's sales factor is within the United States, the
3 calculation must be performed on a stand-alone basis. Sales
4 shall be gross figures without eliminations for transactions
5 with other members of any unitary business.

6 (ii) Whether sales are within the United States is based on
7 the sales factor sourcing rules contained in section 401(3).

8 (C) Any member which is one of the following:

9 (i) A domestic international sales corporation as described
10 in sections 991, 992, 993 and 994 of the Internal Revenue Code
11 of 1986 (26 U.S.C. §§ 991, 992, 993 and 994).

12 (ii) A foreign sales corporation as described in former
13 sections 921, 922, 923, 924, 925, 926 and 927 of the Internal
14 Revenue Code of 1986 (26 U.S.C. §§ 921, 922, 923, 924, 925, 926
15 and 927).

16 (iii) An export trade corporation as described in sections
17 970 and 971 of the Internal Revenue Code of 1986 (26 U.S.C. §§
18 970 and 971).

19 (D) Any member not described in subparagraph (A), (B) or (C)
20 shall include the portion of the member's taxable income derived
21 from or attributable to sources within the United States, as
22 determined under the Internal Revenue Code of 1986 (26 U.S.C. §
23 1 et seq.) without regard to Federal treaties, and its
24 apportionment factors related thereto.

25 (E) Any member that is a "controlled foreign corporation" as
26 defined in section 957 of the Internal Revenue Code of 1986 (26
27 U.S.C. § 957), to the extent the income of that member is income
28 defined in section 952 of the Internal Revenue Code of 1986 (26
29 U.S.C. § 952) as Subpart F income, not excluding lower-tier
30 subsidiaries' distributions of such income which were previously

1 taxed, determined without regard to Federal treaties, and the
2 apportionment factors related to that income; any item of income
3 received by a controlled foreign corporation and the
4 apportionment factors related to such income shall be excluded
5 if the corporation establishes to the satisfaction of the
6 Secretary of Revenue that such income was subject to an
7 effective rate of income tax imposed by a foreign country
8 greater than ninety per cent of the maximum rate of tax
9 specified in section 11 of the Internal Revenue Code of 1986 (26
10 U.S.C. § 11). The effective rate of income tax determination
11 shall be based upon the methodology set forth under 26 CFR
12 1.954-1 (relating to foreign base company income).

13 (F) Any member that is incorporated in or is doing business
14 in a tax haven. The income and apportionment factors of a member
15 doing business in a tax haven shall be excluded if the member
16 establishes to the satisfaction of the Secretary of Revenue that
17 the member's income was subject to an effective rate of income
18 tax imposed by a country greater than ninety per cent of the
19 maximum rate of tax specified in section 11 of the Internal
20 Revenue Code of 1986 (26 U.S.C. § 11).

21 (14) "Commonly controlled group." For a corporation, the
22 corporation is a member of a group of two or more corporations
23 and more than fifty per cent of the voting stock or controlling
24 interest of each member of the group is directly or indirectly
25 owned by a common owner or by common owners, either corporate or
26 noncorporate, or by one or more of the member corporations of
27 the group.

28 (15) "Combined unitary income." The aggregate taxable
29 income or loss of all members of a unitary business, subject to
30 apportionment, except:

1 (A) Income from an intercompany transaction between members
2 of a unitary business shall be deferred in a manner similar to
3 26 CFR 1.1502-13 (relating to intercompany transactions) for
4 Federal taxable income purposes.

5 (B) Dividends paid by one member of a unitary business to
6 another.

7 (C) Income of the following members is not included in the
8 determination of combined unitary income:

9 (i) any member subject to taxation under Article VII, VIII,
10 IX or XV;

11 (ii) any member specified in the definition of "institution"
12 in section 701.5 that would be subject to taxation under Article
13 VII, were it doing business in this State, as defined in section
14 701.5;

15 (iii) any member commonly known as a title insurance company
16 that would be subject to taxation under Article VIII, were it
17 incorporated in this State;

18 (iv) any member specified as an insurance company,
19 association or exchange in Article IX that would be subject to
20 taxation under Article IX, were it transacting insurance
21 business in this State;

22 (v) any member specified in the definition of "institution"
23 in section 1501 that would be subject to taxation under Article
24 XV, were it located, as defined in section 1501, in this State;
25 or

26 (vi) any member that is a small corporation as defined in
27 section 301(s.2) except to the extent of such small
28 corporation's net recognized built-in gain to the extent of and
29 as determined for Federal income tax purposes under section
30 1374(d)(2) of the Internal Revenue Code of 1986 (Public Law 99-

1 514, U.S.C. § 1374(d)(2)).

2 (16) "Member." A corporation that is a member of a unitary
3 business. The term does not include a corporation listed in
4 clause (15)(C).

5 Section 2. Section 402(b) of the act is amended to read:

6 Section 402. Imposition of Tax.--* * *

7 (b) The annual rate of tax on corporate net income imposed
8 by subsection (a) for taxable years beginning for the calendar
9 year or fiscal year on or after the dates set forth shall be as
10 follows:

11	Taxable Year	Tax Rate
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12	January 1, 1995, [and	
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13	each taxable year	
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14	thereafter] through	
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15	<u>December 31, 2021</u>	9.99%
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16	<u>January 1, 2022,</u>	
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17	<u>through December</u>	
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18	<u>31, 2022</u>	<u>8.99%</u>
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19	<u>January 1, 2023,</u>	
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20	<u>through December</u>	
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21	<u>31, 2023</u>	<u>7.99%</u>
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22	<u>January 1, 2024,</u>	
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23	<u>through December</u>	
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24	<u>31, 2024, and each</u>	<u>6.99%</u>
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25	<u>taxable year</u>	
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26	<u>thereafter</u>	
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27 * * *

28 Section 3. Section 403 of the act is amended by adding
29 subsections to read:

30 Section 403. Reports and Payment of Tax.--* * *

1 (a.1) (1) Each corporation that is a member of a unitary
2 business that consists of two or more corporations, unless
3 excluded by the provisions of this article, shall file as part
4 of a combined annual report. The member of the unitary business
5 shall designate one member that is subject to tax under this
6 article to file the combined annual report and to act as agent
7 on behalf of all other members of the unitary business. Each
8 corporation that is a member of a unitary business is liable for
9 its tax liability under this article. The agent is also liable
10 for the aggregate amount of the unitary business' tax liability
11 pursuant to this article.

12 (2) The oath or affirmation of the designated member's
13 president, vice president, treasurer, assistant treasurer or
14 other authorized officer shall constitute the oath or
15 affirmation of each corporation that is a member of that unitary
16 business.

17 (3) The designated member shall transmit to the department
18 upon a form prescribed by the department a combined annual
19 report under oath or affirmation of the member's president, vice
20 president, treasurer, assistant treasurer or other authorized
21 officer.

22 (4) In addition to the information required in subsection
23 (a), the combined annual report shall set forth:

24 (i) All members included in the unitary business.

25 (ii) All necessary data, both in the aggregate and for each
26 member of the unitary business, that sets forth the
27 determination of tax liability for each member of the unitary
28 business.

29 (iii) Any other information that the department may require.

30 (a.2) A member of a unitary business of two or more

1 corporations must determine the member's income and
2 apportionment factors on a water's-edge basis.

3 * * *

4 Section 4. Section 404 of the act is amended to read:

5 Section 404. Consolidated Reports.--The department shall not
6 permit any corporation owning or controlling, directly or
7 indirectly, any of the voting capital stock of another
8 corporation or of other corporations, subject to the provisions
9 of this article, to make a consolidated report[, showing the
10 combined net income].

11 Section 5. Section 3003.3(d) of the act is amended and the
12 section is amended by adding a subsection to read:

13 Section 3003.3. Underpayment of Estimated Tax.--* * *

14 (d) Notwithstanding the provisions of [the preceding
15 subsections,] this section, other than as set forth in
16 subsection (d.1), interest with respect to any underpayment of
17 any installment of estimated tax shall not be imposed if the
18 total amount of all payments of estimated tax made on or before
19 the last date prescribed for the payment of such installment
20 equals or exceeds the amount which would have been required to
21 be paid on or before such date if the estimated tax were an
22 amount equal to the tax computed at the rates applicable to the
23 taxable year, including any minimum tax imposed, but otherwise
24 on the basis of the facts shown on the report of the taxpayer
25 for, and the law applicable to, the safe harbor base year,
26 adjusted for any changes to sections 401, 601, 602 and 1101
27 enacted for the taxable year, if a report showing a liability
28 for tax was filed by the taxpayer for the safe harbor base year.
29 If the total amount of all payments of estimated tax made on or
30 before the last date prescribed for the payment of such

1 installment does not equal or exceed the amount required to be
2 paid per the preceding sentence, but such amount is paid after
3 the date the installment was required to be paid, then the
4 period of underpayment shall run from the date the installment
5 was required to be paid to the date the amount required to be
6 paid per the preceding sentence is paid. Provided, that if the
7 total tax for the safe harbor base year exceeds the tax shown on
8 such report by ten per cent or more, the total tax adjusted to
9 reflect the current tax rate shall be used for purposes of this
10 subsection. In the event that the total tax for the safe harbor
11 base year exceeds the tax shown on the report by ten per cent or
12 more, interest resulting from the utilization of such total tax
13 in the application of the provisions of this subsection shall
14 not be imposed if, within forty-five days of the mailing date of
15 each assessment, payments are made such that the total amount of
16 all payments of estimated tax equals or exceeds the amount which
17 would have been required to be paid on or before such date if
18 the estimated tax were an amount equal to the total tax adjusted
19 to reflect the current tax rate. In any case in which the
20 taxable year for which an underpayment of estimated tax may
21 exist is a short taxable year, in determining the tax shown on
22 the report or the total tax for the safe harbor base year, the
23 tax will be reduced by multiplying it by the ratio of the number
24 of installment payments made in the short taxable year to the
25 number of installment payments required to be made for the full
26 taxable year.

27 (d.1) With respect to any underpayment of an installment of
28 estimated corporate net income tax for any tax year that begins
29 in taxable year 2022 or 2023 by a corporation required to file a
30 combined annual report pursuant to section 403(a.1)(1), interest

1 shall not be imposed if the total amount of all payments of
2 estimated corporate net income tax made on or before the last
3 date prescribed for the payment of such installment equals or
4 exceeds the amount which would have been required to be paid on
5 or before such date if the estimated tax were an amount equal to
6 the combined tax shown on the reports of all the members of the
7 unitary business for the safe harbor base year computed at the
8 rate applicable to the taxable year.

9 Section 6. The amendment of sections 401, 402, 403, 404 and
10 3003.3 of the act shall apply to taxable years beginning after
11 December 31, 2021.

12 Section 7. This act shall take effect immediately.