

Amendment No.

CHAMBER ACTION

Senate

House

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Representative Mercado offered the following:

**Amendment (with title amendment)**

Between lines 192 and 193, insert:

Section 5. Paragraph (z) of subsection (1) of section 220.03, Florida Statutes, is amended, and paragraphs (gg) and (hh) are added to that subsection, to read:

220.03 Definitions.—

(1) SPECIFIC TERMS.—When used in this code, and when not otherwise distinctly expressed or manifestly incompatible with the intent thereof, the following terms shall have the following meanings:

(z) "Taxpayer" means any corporation subject to the tax

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14 imposed by this code, and includes all corporations that are  
15 members of a water's edge group for which a consolidated return  
16 is filed under s. 220.131. However, "taxpayer" does not include  
17 a corporation having no individuals, including individuals  
18 employed by an affiliate, receiving compensation in this state  
19 as defined in s. 220.15 when the only property owned or leased  
20 by said corporation, including an affiliate, in this state is  
21 located at the premises of a printer with which it has  
22 contracted for printing, if such property consists of the final  
23 printed product, property which becomes a part of the final  
24 printed product, or property from which the printed product is  
25 produced.

26 (gg) "Tax haven" means a jurisdiction that, for a  
27 particular tax year:

28 1. Is identified by the Organization for Economic Co-  
29 operation and Development as a tax haven or as having a harmful  
30 preferential tax regime; or

31 2.a. Is a jurisdiction that does not impose or imposes  
32 only a nominal, effective tax on relevant income;

33 b. Has laws or practices that prevent the effective  
34 exchange of information for tax purposes with other governments  
35 regarding taxpayers who are subject to, or benefiting from, the  
36 tax regime;

37 c. Lacks transparency;

38 d. Facilitates the establishment of foreign-owned entities

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39 without the need for a local substantive presence or prohibits  
40 these entities from having any commercial impact on the local  
41 economy;

42 e. Explicitly or implicitly excludes the jurisdiction's  
43 resident taxpayers from taking advantage of the tax regime's  
44 benefits or prohibits enterprises that benefit from the regime  
45 from operating in the jurisdiction's domestic market; or

46 f. Has created a tax regime that is favorable for tax  
47 avoidance, based on an overall assessment of relevant factors,  
48 including whether the jurisdiction has a significant untaxed  
49 offshore financial or other services sector relative to its  
50 overall economy.

51  
52 For purposes of this paragraph, a tax regime lacks transparency  
53 if the details of legislative, legal, or administrative  
54 requirements are not open to public scrutiny and apparent or are  
55 not consistently applied among similarly situated taxpayers. As  
56 used in this paragraph, the term "tax regime" means a set or  
57 system of rules, laws, regulations, or practices by which taxes  
58 are imposed on any person, corporation, or entity, or on any  
59 income, property, incident, indicia, or activity pursuant to  
60 government authority.

61 (hh) "Water's edge group" means a group of corporations  
62 related through common ownership whose business activities are  
63 integrated with, dependent upon, or contribute to a flow of

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64 value among members of the group.

65 Section 6. Section 220.13, Florida Statutes, is amended to  
66 read:

67 220.13 "Adjusted federal income" defined.—

68 (1) The term "adjusted federal income" means an amount  
69 equal to the taxpayer's taxable income as defined in subsection  
70 (2), or such taxable income of more than one taxpayer as  
71 provided in s. 220.1363 ~~s. 220.131~~, for the taxable year,  
72 adjusted as follows:

73 (a) *Additions.*—There shall be added to such taxable  
74 income:

75 1.a. The amount of any tax upon or measured by income,  
76 excluding taxes based on gross receipts or revenues, paid or  
77 accrued as a liability to the District of Columbia or any state  
78 of the United States which is deductible from gross income in  
79 the computation of taxable income for the taxable year.

80 b. Notwithstanding sub-subparagraph a., if a credit taken  
81 under s. 220.1875 is added to taxable income in a previous  
82 taxable year under subparagraph 11. and is taken as a deduction  
83 for federal tax purposes in the current taxable year, the amount  
84 of the deduction allowed shall not be added to taxable income in  
85 the current year. The exception in this sub-subparagraph is  
86 intended to ensure that the credit under s. 220.1875 is added in  
87 the applicable taxable year and does not result in a duplicate  
88 addition in a subsequent year.

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89           2. The amount of interest which is excluded from taxable  
90 income under s. 103(a) of the Internal Revenue Code or any other  
91 federal law, less the associated expenses disallowed in the  
92 computation of taxable income under s. 265 of the Internal  
93 Revenue Code or any other law, excluding 60 percent of any  
94 amounts included in alternative minimum taxable income, as  
95 defined in s. 55(b)(2) of the Internal Revenue Code, if the  
96 taxpayer pays tax under s. 220.11(3).

97           3. In the case of a regulated investment company or real  
98 estate investment trust, an amount equal to the excess of the  
99 net long-term capital gain for the taxable year over the amount  
100 of the capital gain dividends attributable to the taxable year.

101           4. That portion of the wages or salaries paid or incurred  
102 for the taxable year which is equal to the amount of the credit  
103 allowable for the taxable year under s. 220.181. This  
104 subparagraph shall expire on the date specified in s. 290.016  
105 for the expiration of the Florida Enterprise Zone Act.

106           5. That portion of the ad valorem school taxes paid or  
107 incurred for the taxable year which is equal to the amount of  
108 the credit allowable for the taxable year under s. 220.182. This  
109 subparagraph shall expire on the date specified in s. 290.016  
110 for the expiration of the Florida Enterprise Zone Act.

111           6. The amount taken as a credit under s. 220.195 which is  
112 deductible from gross income in the computation of taxable  
113 income for the taxable year.

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114 7. That portion of assessments to fund a guaranty  
115 association incurred for the taxable year which is equal to the  
116 amount of the credit allowable for the taxable year.

117 8. In the case of a nonprofit corporation which holds a  
118 pari-mutuel permit and which is exempt from federal income tax  
119 as a farmers' cooperative, an amount equal to the excess of the  
120 gross income attributable to the pari-mutuel operations over the  
121 attributable expenses for the taxable year.

122 9. The amount taken as a credit for the taxable year under  
123 s. 220.1895.

124 10. Up to nine percent of the eligible basis of any  
125 designated project which is equal to the credit allowable for  
126 the taxable year under s. 220.185.

127 11. The amount taken as a credit for the taxable year  
128 under s. 220.1875. The addition in this subparagraph is intended  
129 to ensure that the same amount is not allowed for the tax  
130 purposes of this state as both a deduction from income and a  
131 credit against the tax. This addition is not intended to result  
132 in adding the same expense back to income more than once.

133 12. The amount taken as a credit for the taxable year  
134 under s. 220.192.

135 13. The amount taken as a credit for the taxable year  
136 under s. 220.193.

137 14. Any portion of a qualified investment, as defined in  
138 s. 288.9913, which is claimed as a deduction by the taxpayer and

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139 taken as a credit against income tax pursuant to s. 288.9916.

140 15. The costs to acquire a tax credit pursuant to s.  
141 288.1254(5) that are deducted from or otherwise reduce federal  
142 taxable income for the taxable year.

143 16. The amount taken as a credit for the taxable year  
144 pursuant to s. 220.194.

145 17. The amount taken as a credit for the taxable year  
146 under s. 220.196. The addition in this subparagraph is intended  
147 to ensure that the same amount is not allowed for the tax  
148 purposes of this state as both a deduction from income and a  
149 credit against the tax. The addition is not intended to result  
150 in adding the same expense back to income more than once.

151 (b) *Subtractions.*—

152 1. There shall be subtracted from such taxable income:

153 a. The net operating loss deduction allowable for federal  
154 income tax purposes under s. 172 of the Internal Revenue Code  
155 for the taxable year, except that any net operating loss that is  
156 transferred pursuant to s. 220.194(6) may not be deducted by the  
157 seller,

158 b. The net capital loss allowable for federal income tax  
159 purposes under s. 1212 of the Internal Revenue Code for the  
160 taxable year,

161 c. The excess charitable contribution deduction allowable  
162 for federal income tax purposes under s. 170(d)(2) of the  
163 Internal Revenue Code for the taxable year, and

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164 d. The excess contributions deductions allowable for  
165 federal income tax purposes under s. 404 of the Internal Revenue  
166 Code for the taxable year.

167  
168 However, a net operating loss and a capital loss shall never be  
169 carried back as a deduction to a prior taxable year, but all  
170 deductions attributable to such losses shall be deemed net  
171 operating loss carryovers and capital loss carryovers,  
172 respectively, and treated in the same manner, to the same  
173 extent, and for the same time periods as are prescribed for such  
174 carryovers in ss. 172 and 1212, respectively, of the Internal  
175 Revenue Code. A deduction is not allowed for net operating  
176 losses, net capital losses, or excess contribution deductions  
177 under 26 U.S.C. ss. 170(d)(2), 172, 1212, and 404 for a member  
178 of a water's edge group who is not a United States member.  
179 Carryovers of net operating losses, net capital losses, or  
180 excess contribution deductions under 26 U.S.C. ss. 170(d)(2),  
181 172, 1212, and 404 may be subtracted only by the member of the  
182 water's edge group who generates a carryover.

183 2. There shall be subtracted from such taxable income any  
184 amount to the extent included therein the following:

185 a. Dividends treated as received from sources without the  
186 United States, as determined under s. 862 of the Internal  
187 Revenue Code.

188 b. All amounts included in taxable income under s. 78 or

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189 s. 951 of the Internal Revenue Code.

190

191 However, as to any amount subtracted under this subparagraph,  
192 there shall be added to such taxable income all expenses  
193 deducted on the taxpayer's return for the taxable year which are  
194 attributable, directly or indirectly, to such subtracted amount.  
195 Further, no amount shall be subtracted with respect to dividends  
196 paid or deemed paid by a Domestic International Sales  
197 Corporation.

198 3. Amounts received by a member of a water's edge group as  
199 dividends paid by another member of the water's edge group must  
200 be subtracted from the taxable income if the dividends are  
201 included in the taxable income.

202 ~~4.3.~~ In computing "adjusted federal income" for taxable  
203 years beginning after December 31, 1976, there shall be allowed  
204 as a deduction the amount of wages and salaries paid or incurred  
205 within this state for the taxable year for which no deduction is  
206 allowed pursuant to s. 280C(a) of the Internal Revenue Code  
207 (relating to credit for employment of certain new employees).

208 ~~5.4.~~ There shall be subtracted from such taxable income  
209 any amount of nonbusiness income included therein.

210 ~~6.5.~~ There shall be subtracted any amount of taxes of  
211 foreign countries allowable as credits for taxable years  
212 beginning on or after September 1, 1985, under s. 901 of the  
213 Internal Revenue Code to any corporation which derived less than

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214 20 percent of its gross income or loss for its taxable year  
215 ended in 1984 from sources within the United States, as  
216 described in s. 861(a)(2)(A) of the Internal Revenue Code, not  
217 including credits allowed under ss. 902 and 960 of the Internal  
218 Revenue Code, withholding taxes on dividends within the meaning  
219 of sub-subparagraph 2.a., and withholding taxes on royalties,  
220 interest, technical service fees, and capital gains.

221 ~~7.6.~~ Notwithstanding any other provision of this code,  
222 except with respect to amounts subtracted pursuant to  
223 subparagraphs 1. and ~~4.3.~~, any increment of any apportionment  
224 factor which is directly related to an increment of gross  
225 receipts or income which is deducted, subtracted, or otherwise  
226 excluded in determining adjusted federal income shall be  
227 excluded from both the numerator and denominator of such  
228 apportionment factor. Further, all valuations made for  
229 apportionment factor purposes shall be made on a basis  
230 consistent with the taxpayer's method of accounting for federal  
231 income tax purposes.

232 (c) *Installment sales occurring after October 19, 1980.*—

233 1. In the case of any disposition made after October 19,  
234 1980, the income from an installment sale shall be taken into  
235 account for the purposes of this code in the same manner that  
236 such income is taken into account for federal income tax  
237 purposes.

238 2. Any taxpayer who regularly sells or otherwise disposes

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239 of personal property on the installment plan and reports the  
240 income therefrom on the installment method for federal income  
241 tax purposes under s. 453(a) of the Internal Revenue Code shall  
242 report such income in the same manner under this code.

243 (d) *Nonallowable deductions.*—A deduction for net operating  
244 losses, net capital losses, or excess contributions deductions  
245 under ss. 170(d)(2), 172, 1212, and 404 of the Internal Revenue  
246 Code which has been allowed in a prior taxable year for Florida  
247 tax purposes shall not be allowed for Florida tax purposes,  
248 notwithstanding the fact that such deduction has not been fully  
249 utilized for federal tax purposes.

250 (e) *Adjustments related to federal acts.*—Taxpayers must  
251 ~~shall be required to~~ make the adjustments prescribed in this  
252 paragraph for Florida tax purposes with respect to certain tax  
253 benefits received pursuant to the Economic Stimulus Act of 2008,  
254 the American Recovery and Reinvestment Act of 2009, the Small  
255 Business Jobs Act of 2010, the Tax Relief, Unemployment  
256 Insurance Reauthorization, and Job Creation Act of 2010, the  
257 American Taxpayer Relief Act of 2012, the Tax Increase  
258 Prevention Act of 2014, the Consolidated Appropriations Act,  
259 2016, and the Tax Cuts and Jobs Act of 2017.

260 1. There shall be added to such taxable income an amount  
261 equal to 100 percent of any amount deducted for federal income  
262 tax purposes as bonus depreciation for the taxable year pursuant  
263 to ss. 167 and 168(k) of the Internal Revenue Code of 1986, as

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264 amended by s. 103 of Pub. L. No. 110-185, s. 1201 of Pub. L. No.  
265 111-5, s. 2022 of Pub. L. No. 111-240, s. 401 of Pub. L. No.  
266 111-312, s. 331 of Pub. L. No. 112-240, s. 125 of Pub. L. No.  
267 113-295, s. 143 of Division Q of Pub. L. No. 114-113, and s.  
268 13201 of Pub. L. No. 115-97, for property placed in service  
269 after December 31, 2007, and before January 1, 2027. For the  
270 taxable year and for each of the 6 subsequent taxable years,  
271 there shall be subtracted from such taxable income an amount  
272 equal to one-seventh of the amount by which taxable income was  
273 increased pursuant to this subparagraph, notwithstanding any  
274 sale or other disposition of the property that is the subject of  
275 the adjustments and regardless of whether such property remains  
276 in service in the hands of the taxpayer.

277 2. There shall be added to such taxable income an amount  
278 equal to 100 percent of any amount in excess of \$128,000  
279 deducted for federal income tax purposes for the taxable year  
280 pursuant to s. 179 of the Internal Revenue Code of 1986, as  
281 amended by s. 102 of Pub. L. No. 110-185, s. 1202 of Pub. L. No.  
282 111-5, s. 2021 of Pub. L. No. 111-240, s. 402 of Pub. L. No.  
283 111-312, s. 315 of Pub. L. No. 112-240, and s. 127 of Pub. L.  
284 No. 113-295, for taxable years beginning after December 31,  
285 2007, and before January 1, 2015. For the taxable year and for  
286 each of the 6 subsequent taxable years, there shall be  
287 subtracted from such taxable income one-seventh of the amount by  
288 which taxable income was increased pursuant to this

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289 subparagraph, notwithstanding any sale or other disposition of  
290 the property that is the subject of the adjustments and  
291 regardless of whether such property remains in service in the  
292 hands of the taxpayer.

293 3. There shall be added to such taxable income an amount  
294 equal to the amount of deferred income not included in such  
295 taxable income pursuant to s. 108(i)(1) of the Internal Revenue  
296 Code of 1986, as amended by s. 1231 of Pub. L. No. 111-5. There  
297 shall be subtracted from such taxable income an amount equal to  
298 the amount of deferred income included in such taxable income  
299 pursuant to s. 108(i)(1) of the Internal Revenue Code of 1986,  
300 as amended by s. 1231 of Pub. L. No. 111-5.

301 4. Subtractions available under this paragraph may be  
302 transferred to the surviving or acquiring entity following a  
303 merger or acquisition and used in the same manner and with the  
304 same limitations as specified by this paragraph.

305 5. The additions and subtractions specified in this  
306 paragraph are intended to adjust taxable income for Florida tax  
307 purposes, and, notwithstanding any other provision of this code,  
308 such additions and subtractions shall be permitted to change a  
309 taxpayer's net operating loss for Florida tax purposes.

310 (2) For purposes of this section, a taxpayer's taxable  
311 income for the taxable year means taxable income as defined in  
312 s. 63 of the Internal Revenue Code and properly reportable for  
313 federal income tax purposes for the taxable year, but subject to

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314 the limitations set forth in paragraph (1)(b) with respect to  
315 the deductions provided by ss. 172 (relating to net operating  
316 losses), 170(d)(2) (relating to excess charitable  
317 contributions), 404(a)(1)(D) (relating to excess pension trust  
318 contributions), 404(a)(3)(A) and (B) (to the extent relating to  
319 excess stock bonus and profit-sharing trust contributions), and  
320 1212 (relating to capital losses) of the Internal Revenue Code,  
321 except that, subject to the same limitations, the term:

322 (a) "Taxable income," in the case of a life insurance  
323 company subject to the tax imposed by s. 801 of the Internal  
324 Revenue Code, means life insurance company taxable income;  
325 however, for purposes of this code, the total of any amounts  
326 subject to tax under s. 815(a)(2) of the Internal Revenue Code  
327 pursuant to s. 801(c) of the Internal Revenue Code shall not  
328 exceed, cumulatively, the total of any amounts determined under  
329 s. 815(c)(2) of the Internal Revenue Code of 1954, as amended,  
330 from January 1, 1972, to December 31, 1983;

331 (b) "Taxable income," in the case of an insurance company  
332 subject to the tax imposed by s. 831(b) of the Internal Revenue  
333 Code, means taxable investment income;

334 (c) "Taxable income," in the case of an insurance company  
335 subject to the tax imposed by s. 831(a) of the Internal Revenue  
336 Code, means insurance company taxable income;

337 (d) "Taxable income," in the case of a regulated  
338 investment company subject to the tax imposed by s. 852 of the

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339 Internal Revenue Code, means investment company taxable income;

340 (e) "Taxable income," in the case of a real estate  
341 investment trust subject to the tax imposed by s. 857 of the  
342 Internal Revenue Code, means the income subject to tax, computed  
343 as provided in s. 857 of the Internal Revenue Code;

344 (f) "Taxable income," in the case of a corporation which  
345 is a member of an affiliated group of corporations filing a  
346 consolidated income tax return for the taxable year for federal  
347 income tax purposes, means taxable income of such corporation  
348 for federal income tax purposes as if such corporation had filed  
349 a separate federal income tax return for the taxable year and  
350 each preceding taxable year for which it was a member of an  
351 affiliated group, ~~unless a consolidated return for the taxpayer  
352 and others is required or elected under s. 220.131;~~

353 (g) "Taxable income," in the case of a cooperative  
354 corporation or association, means the taxable income of such  
355 organization determined in accordance with the provisions of ss.  
356 1381-1388 of the Internal Revenue Code;

357 (h) "Taxable income," in the case of an organization which  
358 is exempt from the federal income tax by reason of s. 501(a) of  
359 the Internal Revenue Code, means its unrelated business taxable  
360 income as determined under s. 512 of the Internal Revenue Code;

361 (i) "Taxable income," in the case of a corporation for  
362 which there is in effect for the taxable year an election under  
363 s. 1362(a) of the Internal Revenue Code, means the amounts

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364 subject to tax under s. 1374 or s. 1375 of the Internal Revenue  
365 Code for each taxable year;

366 (j) "Taxable income," in the case of a limited liability  
367 company, other than a limited liability company classified as a  
368 partnership for federal income tax purposes, as defined in and  
369 organized pursuant to chapter 605 or qualified to do business in  
370 this state as a foreign limited liability company or other than  
371 a similar limited liability company classified as a partnership  
372 for federal income tax purposes and created as an artificial  
373 entity pursuant to the statutes of the United States or any  
374 other state, territory, possession, or jurisdiction, if such  
375 limited liability company or similar entity is taxable as a  
376 corporation for federal income tax purposes, means taxable  
377 income determined as if such limited liability company were  
378 required to file or had filed a federal corporate income tax  
379 return under the Internal Revenue Code;

380 (k) "Taxable income," in the case of a taxpayer liable for  
381 the alternative minimum tax as defined in s. 55 of the Internal  
382 Revenue Code, means the alternative minimum taxable income as  
383 defined in s. 55(b)(2) of the Internal Revenue Code, less the  
384 exemption amount computed under s. 55(d) of the Internal Revenue  
385 Code. A taxpayer is not liable for the alternative minimum tax  
386 unless the taxpayer's federal tax return, or related federal  
387 consolidated tax return, if included in a consolidated return  
388 for federal tax purposes, reflect a liability on the return

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389 filed for the alternative minimum tax as defined in s. 55(b) (2)  
390 of the Internal Revenue Code;

391 (1) "Taxable income," in the case of a taxpayer whose  
392 taxable income is not otherwise defined in this subsection,  
393 means the sum of amounts to which a tax rate specified in s. 11  
394 of the Internal Revenue Code plus the amount to which a tax rate  
395 specified in s. 1201(a) (2) of the Internal Revenue Code are  
396 applied for federal income tax purposes.

397 Section 7. Section 220.131, Florida Statutes, is repealed.

398 Section 8. Section 220.136, Florida Statutes, is created  
399 to read:

400 220.136 Determination of the members of a water's edge  
401 group.-

402 (1) A corporation having 50 percent or more of its  
403 outstanding voting stock directly or indirectly owned or  
404 controlled by a water's edge group is presumed to be a member of  
405 the water's edge group. A corporation having less than 50  
406 percent of its outstanding voting stock directly or indirectly  
407 owned or controlled by a water's edge group is a member of the  
408 water's edge group if the businesses activities of the  
409 corporation show that the corporation is a member of the water's  
410 edge group. All of the income of a corporation that is a member  
411 of a water's edge group is presumed to be unitary. For purposes  
412 of this subsection, the attribution rules of 26 U.S.C. s. 318  
413 must be used to determine whether voting stock is indirectly

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415 (2) (a) A corporation that conducts business outside the  
416 United States is not a member of a water's edge group if 80  
417 percent or more of the corporation's property and payroll, as  
418 determined by the apportionment factors described in ss. 220.15  
419 and 220.1363, may be assigned to locations outside of the United  
420 States. However, such corporations that are incorporated in a  
421 tax haven may be a member of a water's edge group pursuant to  
422 subsection (1). This subsection does not exempt a corporation  
423 that is not a member of a water's edge group from this chapter.

424 (b) As used in this subsection, the term "United States"  
425 means the 50 states, the District of Columbia, and Puerto Rico.

426 (c) The apportionment factors described in ss. 220.1363  
427 and 220.15 must be used to determine whether a special industry  
428 corporation has engaged in a sufficient amount of activities  
429 outside of the United States to exclude it from treatment as a  
430 member of a water's edge group.

431 Section 9. Section 220.1363, Florida Statutes, is created  
432 to read:

433 220.1363 Water's edge groups; special requirements.-

434 (1) For purposes of this section, the term "water's edge  
435 reporting method" is a method to determine the taxable business  
436 profits of a group of entities conducting a unitary business.  
437 Under this method, the net income of the entities must be added  
438 together, along with the additions and subtractions under s.

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439 220.13 and apportioned to this state as a single taxpayer under  
440 ss. 220.15 and 220.151. However, each special industry member  
441 included in a water's edge group return, which would otherwise  
442 be permitted to use a special method of apportionment under s.  
443 220.151, shall convert its single-factor apportionment to a  
444 three-factor apportionment of property, payroll, and sales. The  
445 special industry member shall calculate the denominator of its  
446 property, payroll, and sales factors in the same manner as those  
447 denominators are calculated by members that are not special  
448 industry members. The numerator of its sales, property, and  
449 payroll factors is the product of the denominator of each factor  
450 multiplied by the premiums or revenue-miles-factor ratio  
451 otherwise applicable under s. 220.151.

452 (2) All members of a water's edge group must use the  
453 water's edge reporting method, under which:

454 (a) Adjusted federal income, for purposes of s. 220.12,  
455 means the sum of adjusted federal income of all members of the  
456 water's edge group as determined for a concurrent taxable year.

457 (b) The numerators and denominators of the apportionment  
458 factors must be calculated for all members of the water's edge  
459 group combined.

460 (c) Intercompany sales transactions between members of the  
461 water's edge group are not included in the numerator or  
462 denominator of the sales factor under ss. 220.15 and 220.151,  
463 regardless of whether indicia of a sale exist.

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464 (d) For sales of intangibles, including accounts  
465 receivable, notes, bonds, and stock, which are made to entities  
466 outside the group, only the net proceeds are included in the  
467 numerator and denominator of the sales factor.

468 (e) Sales that are not allocated or apportioned to any  
469 taxing jurisdiction, otherwise known as "nowhere sales," may not  
470 be included in the numerator or denominator of the sales factor.

471 (f) The income attributable to the Florida activities of a  
472 corporation that is exempt from taxation under the Interstate  
473 Income Act of 1959, Pub. L. No. 86-272, is excluded from the  
474 apportionment factor numerators in the calculation of corporate  
475 income tax, even if another member of the water's edge group has  
476 nexus with this state and is subject to tax.

477  
478 As used in this subsection, the term "sale" includes, but is not  
479 limited to, loans, payments for the use of intangibles,  
480 dividends, and management fees.

481 (3) (a) If a parent corporation is a member of the water's  
482 edge group and has nexus with this state, a single water's edge  
483 group return must be filed in the name and under the federal  
484 employer identification number of the parent corporation. If the  
485 water's edge group does not have a parent corporation, if the  
486 parent corporation is not a member of the water's edge group, or  
487 if the parent corporation does not have nexus with this state,  
488 then the members of the water's edge group must choose a member

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489 subject to the tax imposed by this chapter to file the return.  
490 The members of the water's edge group may not choose another  
491 member to file a corporate income tax return in subsequent years  
492 unless the filing member does not maintain nexus with this state  
493 or does not remain a member of the water's edge group. The  
494 return must be signed by an authorized officer of the filing  
495 member as the agent for the water's edge group.

496 (b) If members of a water's edge group have different  
497 taxable years, the taxable year of a majority of the members of  
498 the water's edge group is the taxable year of the water's edge  
499 group. If the taxable years of a majority of the members do not  
500 correspond, the taxable year of the member that files the return  
501 for the water's edge group is the taxable year of the water's  
502 edge group.

503 (c)1. A member of a water's edge group having a taxable  
504 year that does not correspond to the taxable year of the water's  
505 edge group shall determine its income for inclusion on the tax  
506 return for the water's edge group. The member shall use:

507 a. The precise amount of taxable income received during  
508 the months corresponding to the taxable year of the water's edge  
509 group, if the precise amount can be readily determined from the  
510 member's books and records.

511 b. The taxable income of the member converted to conform  
512 to the taxable year of the water's edge group on the basis of  
513 the number of months falling within the taxable year of the

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514 water's edge group, such that, if the taxable year of the  
515 water's edge group is a calendar year and a member operates on a  
516 fiscal year ending on April 30, the income of the member must  
517 include 8/12 of the income from the current taxable year and  
518 4/12 of the income from the preceding taxable year. This method  
519 to determine the income of a member may be used only if the  
520 return can be timely filed after the end of the taxable year of  
521 the water's edge group.

522 c. The taxable income of the member during its taxable  
523 year that ends within the taxable year of the water's edge  
524 group.

525 2. The method of determining the income of a member of a  
526 water's edge group whose taxable year does not correspond to the  
527 taxable year of the water's edge group may not change as long as  
528 the member remains a member of the water's edge group. The  
529 apportionment factors for the member must be applied to the  
530 income of the member for the taxable year of the water's edge  
531 group.

532 (4) (a) A water's edge group return must include a  
533 computational schedule that:

534 1. Combines the federal income of all members of the  
535 water's edge group;

536 2. Shows all intercompany eliminations;

537 3. Shows Florida additions and subtractions under s.  
538 220.13; and

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539 4. Shows the calculation of the combined apportionment  
540 factors.

541 (b) In addition to its return, a water's edge group shall  
542 also file a domestic disclosure spreadsheet. The spreadsheet  
543 must fully disclose:

544 1. The income reported to each state;

545 2. The state tax liability;

546 3. The method used for apportioning or allocating income  
547 to the various states; and

548 4. Other information required by department rule to  
549 determine the proper amount of tax due to each state and to  
550 identify the water's edge group.

551 (5) The department may adopt rules and forms to administer  
552 this section. The Legislature intends to grant the department  
553 extensive authority to adopt rules and forms describing and  
554 defining principles for determining the existence of a water's  
555 edge business, definitions of common control, methods of  
556 reporting, and related forms, principles, and other definitions.

557 Section 10. Section 220.14, Florida Statutes, is amended  
558 to read:

559 220.14 Exemption.—

560 (1) In computing a taxpayer's liability for tax under this  
561 code, there shall be exempt from the tax \$50,000 of net income  
562 as defined in s. 220.12 or such lesser amount as will, without  
563 increasing the taxpayer's federal income tax liability, provide

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564 the state with an amount under this code which is equal to the  
565 maximum federal income tax credit which may be available from  
566 time to time under federal law.

567 (2) In the case of a taxable year for a period of less  
568 than 12 months, the exemption allowed by this section must ~~shall~~  
569 be prorated on the basis of the number of days in such year to  
570 365 days, or, in a leap year, 366 days.

571 (3) Only one exemption shall be allowed to taxpayers  
572 filing a water's edge group ~~consolidated~~ return under this code.

573 (4) Notwithstanding any other provision of this code, not  
574 more than one exemption under this section may be allowed to the  
575 Florida members of a controlled group of corporations, as  
576 defined in s. 1563 of the Internal Revenue Code with respect to  
577 taxable years ending on or after December 31, 1970, filing  
578 separate returns under this code. The exemption described in  
579 this section shall be divided equally among such Florida members  
580 of the group, unless all of such members consent, at such time  
581 and in such manner as the department shall by regulation  
582 prescribe, to an apportionment plan providing for an unequal  
583 allocation of such exemption.

584 Section 11. Paragraph (c) of subsection (5) of section  
585 220.15, Florida Statutes, is amended to read:

586 220.15 Apportionment of adjusted federal income.—

587 (5) The sales factor is a fraction the numerator of which  
588 is the total sales of the taxpayer in this state during the

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589 taxable year or period and the denominator of which is the total  
590 sales of the taxpayer everywhere during the taxable year or  
591 period.

592 (c) Sales of a financial organization, including, but not  
593 limited to, banking and savings institutions, investment  
594 companies, real estate investment trusts, and brokerage  
595 companies, occur in this state if derived from:

596 1. Fees, commissions, or other compensation for financial  
597 services rendered within this state;

598 2. Gross profits from trading in stocks, bonds, or other  
599 securities managed within this state;

600 3. Interest received within this state, other than  
601 interest from loans secured by mortgages, deeds of trust, or  
602 other liens upon real or tangible personal property located  
603 without this state, and dividends received within this state;

604 4. Interest charged to customers at places of business  
605 maintained within this state for carrying debit balances of  
606 margin accounts, without deduction of any costs incurred in  
607 carrying such accounts;

608 5. Interest, fees, commissions, or other charges or gains  
609 from loans secured by mortgages, deeds of trust, or other liens  
610 upon real or tangible personal property located in this state or  
611 from installment sale agreements originally executed by a  
612 taxpayer or the taxpayer's agent to sell real or tangible  
613 personal property located in this state;

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614 6. Rents from real or tangible personal property located  
615 in this state; or

616 7. Any other gross income, including other interest,  
617 resulting from the operation as a financial organization within  
618 this state.

619  
620 ~~In computing the amounts under this paragraph, any amount~~  
621 ~~received by a member of an affiliated group (determined under s.~~  
622 ~~1504(a) of the Internal Revenue Code, but without reference to~~  
623 ~~whether any such corporation is an "includable corporation"~~  
624 ~~under s. 1504(b) of the Internal Revenue Code) from another~~  
625 ~~member of such group shall be included only to the extent such~~  
626 ~~amount exceeds expenses of the recipient directly related~~  
627 ~~thereto.~~

628 Section 12. Paragraph (f) of subsection (1) of section  
629 220.183, Florida Statutes, is amended to read:

630 220.183 Community contribution tax credit.—

631 (1) AUTHORIZATION TO GRANT COMMUNITY CONTRIBUTION TAX  
632 CREDITS; LIMITATIONS ON INDIVIDUAL CREDITS AND PROGRAM  
633 SPENDING.—

634 ~~(f) A taxpayer who files a Florida consolidated return as~~  
635 ~~a member of an affiliated group pursuant to s. 220.131(1) may be~~  
636 ~~allowed the credit on a consolidated return basis.~~

637 Section 13. Paragraphs (b), (c), and (d) of subsection (2)  
638 of section 220.1845, Florida Statutes, are amended to read:

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639 | 220.1845 Contaminated site rehabilitation tax credit.—

640 | (2) AUTHORIZATION FOR TAX CREDIT; LIMITATIONS.—

641 | (b) A tax credit applicant, or multiple tax credit  
642 | applicants working jointly to clean up a single site, may not be  
643 | granted more than \$500,000 per year in tax credits for each site  
644 | voluntarily rehabilitated. Multiple tax credit applicants shall  
645 | be granted tax credits in the same proportion as their  
646 | contribution to payment of cleanup costs. Subject to the same  
647 | conditions and limitations as provided in this section, a  
648 | municipality, county, or other tax credit applicant which  
649 | voluntarily rehabilitates a site may receive not more than  
650 | \$500,000 per year in tax credits which it can subsequently  
651 | transfer subject to ~~the provisions in~~ paragraph (f) ~~(g)~~.

652 | (c) If the credit granted under this section is not fully  
653 | used in any one year because of insufficient tax liability on  
654 | the part of the corporation, the unused amount may be carried  
655 | forward for up to 5 years. The carryover credit may be used in a  
656 | subsequent year if the tax imposed by this chapter for that year  
657 | exceeds the credit for which the corporation is eligible in that  
658 | year after applying the other credits and unused carryovers in  
659 | the order provided by s. 220.02(8). If during the 5-year period  
660 | the credit is transferred, in whole or in part, pursuant to  
661 | paragraph (f) ~~(g)~~, each transferee has 5 years after the date of  
662 | transfer to use its credit.

663 | ~~(d) A taxpayer that files a consolidated return in this~~

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664 ~~state as a member of an affiliated group under s. 220.131(1) may~~  
665 ~~be allowed the credit on a consolidated return basis up to the~~  
666 ~~amount of tax imposed upon the consolidated group.~~

667 Section 14. Subsection (2) of section 220.1875, Florida  
668 Statutes, is amended to read:

669 220.1875 Credit for contributions to eligible nonprofit  
670 scholarship-funding organizations.—

671 ~~(2) A taxpayer who files a Florida consolidated return as~~  
672 ~~a member of an affiliated group pursuant to s. 220.131(1) may be~~  
673 ~~allowed the credit on a consolidated return basis; however, the~~  
674 ~~total credit taken by the affiliated group is subject to the~~  
675 ~~limitation established under subsection (1).~~

676 Section 15. Paragraphs (a) and (c) of subsection (3) of  
677 section 220.191, Florida Statutes, are amended to read:

678 220.191 Capital investment tax credit.—

679 (3) (a) Notwithstanding subsection (2), an annual credit  
680 against the tax imposed by this chapter shall be granted to a  
681 qualifying business which establishes a qualifying project  
682 pursuant to subparagraph (1)(g)3., in an amount equal to the  
683 lesser of \$15 million or 5 percent of the eligible capital costs  
684 made in connection with a qualifying project, for a period not  
685 to exceed 20 years beginning with the commencement of operations  
686 of the project. The tax credit shall be granted against the  
687 corporate income tax liability of the qualifying business ~~and as~~  
688 ~~further provided in paragraph (c).~~ The total tax credit provided

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689 pursuant to this subsection shall be equal to no more than 100  
690 percent of the eligible capital costs of the qualifying project.

691 (c) The credit granted under this subsection may be used  
692 in whole or in part by the qualifying business ~~or any~~  
693 ~~corporation that is either a member of that qualifying~~  
694 ~~business's affiliated group of corporations, is a related entity~~  
695 ~~taxable as a cooperative under subchapter T of the Internal~~  
696 ~~Revenue Code, or, if the qualifying business is an entity~~  
697 ~~taxable as a cooperative under subchapter T of the Internal~~  
698 ~~Revenue Code, is related to the qualifying business. Any entity~~  
699 ~~related to the qualifying business may continue to file as a~~  
700 ~~member of a Florida-nexus consolidated group pursuant to a prior~~  
701 ~~election made under s. 220.131(1), Florida Statutes (1985), even~~  
702 ~~if the parent of the group changes due to a direct or indirect~~  
703 ~~acquisition of the former common parent of the group. Any credit~~  
704 ~~can be used by any of the affiliated companies or related~~  
705 ~~entities referenced in this paragraph to the same extent as it~~  
706 ~~could have been used by the qualifying business. However, any~~  
707 ~~such use shall not operate to increase the amount of the credit~~  
708 ~~or extend the period within which the credit must be used.~~

709 Section 16. Subsection (2) of section 220.192, Florida  
710 Statutes, is amended to read:

711 220.192 Renewable energy technologies investment tax  
712 credit.—

713 (2) TAX CREDIT.—For tax years beginning on or after

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714 January 1, 2013, a credit against the tax imposed by this  
715 chapter shall be granted in an amount equal to the eligible  
716 costs. Credits may be used in tax years beginning January 1,  
717 2013, and ending December 31, 2016, after which the credit shall  
718 expire. If the credit is not fully used in any one tax year  
719 because of insufficient tax liability on the part of the  
720 corporation, the unused amount may be carried forward and used  
721 in tax years beginning January 1, 2013, and ending December 31,  
722 2018, after which the credit carryover expires and may not be  
723 used. ~~A taxpayer that files a consolidated return in this state~~  
724 ~~as a member of an affiliated group under s. 220.131(1) may be~~  
725 ~~allowed the credit on a consolidated return basis up to the~~  
726 ~~amount of tax imposed upon the consolidated group.~~ Any eligible  
727 cost for which a credit is claimed and which is deducted or  
728 otherwise reduces federal taxable income shall be added back in  
729 computing adjusted federal income under s. 220.13.

730 Section 17. Paragraphs (c) and (e) of subsection (3) of  
731 section 220.193, Florida Statutes, are amended to read:

732 220.193 Florida renewable energy production credit.—

733 (3) An annual credit against the tax imposed by this  
734 section shall be allowed to a taxpayer, based on the taxpayer's  
735 production and sale of electricity from a new or expanded  
736 Florida renewable energy facility. For a new facility, the  
737 credit shall be based on the taxpayer's sale of the facility's  
738 entire electrical production. For an expanded facility, the

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739 credit shall be based on the increases in the facility's  
740 electrical production that are achieved after May 1, 2012.

741 (c) If the amount of credits applied for each year exceeds  
742 the amount authorized in paragraph (f) ~~(g)~~, the Department of  
743 Agriculture and Consumer Services shall allocate credits to  
744 qualified applicants based on the following priority:

745 1. An applicant who places a new facility in operation  
746 after May 1, 2012, shall be allocated credits first, up to a  
747 maximum of \$250,000 each, with any remaining credits to be  
748 granted pursuant to subparagraph 3., but if the claims for  
749 credits under this subparagraph exceed the state fiscal year cap  
750 in paragraph (f) ~~(g)~~, credits shall be allocated pursuant to  
751 this subparagraph on a prorated basis based upon each  
752 applicant's qualified production and sales as a percentage of  
753 total production and sales for all applicants in this category  
754 for the fiscal year.

755 2. An applicant who does not qualify under subparagraph 1.  
756 but who claims a credit of \$50,000 or less shall be allocated  
757 credits next, but if the claims for credits under this  
758 subparagraph, combined with credits allocated in subparagraph  
759 1., exceed the state fiscal year cap in paragraph (f) ~~(g)~~,  
760 credits shall be allocated pursuant to this subparagraph on a  
761 prorated basis based upon each applicant's qualified production  
762 and sales as a percentage of total qualified production and  
763 sales for all applicants in this category for the fiscal year.

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764 3. An applicant who does not qualify under subparagraph 1.  
765 or subparagraph 2. and an applicant whose credits have not been  
766 fully allocated under subparagraph 1. shall be allocated credits  
767 next. If there is insufficient capacity within the amount  
768 authorized for the state fiscal year in paragraph (f) ~~(g)~~, and  
769 after allocations pursuant to subparagraphs 1. and 2., the  
770 credits allocated under this subparagraph shall be prorated  
771 based upon each applicant's unallocated claims for qualified  
772 production and sales as a percentage of total unallocated claims  
773 for qualified production and sales of all applicants in this  
774 category, up to a maximum of \$1 million per taxpayer per state  
775 fiscal year. If, after application of this \$1 million cap, there  
776 is excess capacity under the state fiscal year cap in paragraph  
777 (f) ~~(g)~~ in any state fiscal year, that remaining capacity shall  
778 be used to allocate additional credits with priority given in  
779 the order set forth in this subparagraph and without regard to  
780 the \$1 million per taxpayer cap.

781 ~~(e) A taxpayer that files a consolidated return in this~~  
782 ~~state as a member of an affiliated group under s. 220.131(1) may~~  
783 ~~be allowed the credit on a consolidated return basis up to the~~  
784 ~~amount of tax imposed upon the consolidated group.~~

785 Section 18. Section 220.51, Florida Statutes, is amended  
786 to read:

787 220.51 Adoption ~~Promulgation~~ of rules and regulations.—In  
788 accordance with the Administrative Procedure Act, chapter 120,

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789 the department is authorized to make, adopt ~~promulgate~~, and  
790 enforce such reasonable rules and regulations, and to prescribe  
791 such forms relating to the administration and enforcement of ~~the~~  
792 ~~provisions of~~ this code, as it may deem appropriate, including:

793 (1) Rules for initial implementation of this code and for  
794 taxpayers' transitional taxable years commencing before and  
795 ending after January 1, 1972; and

796 (2) Rules or regulations to clarify whether certain  
797 groups, organizations, or associations formed under the laws of  
798 this state or any other state, country, or jurisdiction shall be  
799 deemed "taxpayers" for the purposes of this code, in accordance  
800 with the legislative declarations of intent in s. 220.02; ~~and~~

801 ~~(3) Regulations relating to consolidated reporting for~~  
802 ~~affiliated groups of corporations, in order to provide for an~~  
803 ~~equitable and just administration of this code with respect to~~  
804 ~~multicorporate taxpayers.~~

805 Section 19. Section 220.64, Florida Statutes, is amended  
806 to read:

807 220.64 Other provisions applicable to franchise tax.—To  
808 the extent that they are not manifestly incompatible with ~~the~~  
809 ~~provisions of~~ this part, parts I, III, IV, V, VI, VIII, IX, and  
810 X of this code and ss. 220.12, 220.13, 220.136, 220.1363,  
811 220.15, and 220.16 apply to the franchise tax imposed by this  
812 part. Under rules prescribed by the department ~~in s. 220.131~~, a  
813 consolidated return may be filed by any affiliated group of

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814 corporations composed of one or more banks or savings  
815 associations, ~~its or~~ their Florida parent corporations  
816 ~~corporation~~, and any nonbank or nonsavings subsidiaries of such  
817 parent corporations ~~corporation~~.

818 Section 20. Paragraph (f) of subsection (4) and paragraph  
819 (a) of subsection (5) of section 288.1254, Florida Statutes, are  
820 amended to read:

821 288.1254 Entertainment industry financial incentive  
822 program.—

823 (4) TAX CREDIT ELIGIBILITY; TAX CREDIT AWARDS; QUEUES;  
824 ELECTION AND DISTRIBUTION; CARRYFORWARD; CONSOLIDATED RETURNS;  
825 PARTNERSHIP AND NONCORPORATE DISTRIBUTIONS; MERGERS AND  
826 ACQUISITIONS.—

827 ~~(f) Consolidated returns.—A certified production company~~  
828 ~~that files a Florida consolidated return as a member of an~~  
829 ~~affiliated group under s. 220.131(1) may be allowed the credit~~  
830 ~~on a consolidated return basis up to the amount of the tax~~  
831 ~~imposed upon the consolidated group under chapter 220.~~

832 (5) TRANSFER OF TAX CREDITS.—

833 (a) *Authorization*.—Upon application to the Office of Film  
834 and Entertainment and approval by the department, a certified  
835 production company, or a partner or member that has received a  
836 distribution under paragraph (4)(f) ~~(4)(g)~~, may elect to  
837 transfer, in whole or in part, any unused credit amount granted  
838 under this section. An election to transfer any unused tax

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839 credit amount under chapter 212 or chapter 220 must be made no  
840 later than 5 years after the date the credit is awarded, after  
841 which period the credit expires and may not be used. The  
842 department shall notify the Department of Revenue of the  
843 election and transfer.

844 Section 21. Subsections (9) and (10) of section 376.30781,  
845 Florida Statutes, are amended to read:

846 376.30781 Tax credits for rehabilitation of drycleaning-  
847 solvent-contaminated sites and brownfield sites in designated  
848 brownfield areas; application process; rulemaking authority;  
849 revocation authority.-

850 (9) On or before May 1, the Department of Environmental  
851 Protection shall inform each tax credit applicant that is  
852 subject to the January 31 annual application deadline of the  
853 applicant's eligibility status and the amount of any tax credit  
854 due. The department shall provide each eligible tax credit  
855 applicant with a tax credit certificate that must be submitted  
856 with its tax return to the Department of Revenue to claim the  
857 tax credit or be transferred pursuant to s. 220.1845(2)(f) ~~s.~~  
858 ~~220.1845(2)(g)~~. The May 1 deadline for annual site  
859 rehabilitation tax credit certificate awards shall not apply to  
860 any tax credit application for which the department has issued a  
861 notice of deficiency pursuant to subsection (8). The department  
862 shall respond within 90 days after receiving a response from the  
863 tax credit applicant to such a notice of deficiency. Credits may

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864 not result in the payment of refunds if total credits exceed the  
865 amount of tax owed.

866 (10) For solid waste removal, new health care facility or  
867 health care provider, and affordable housing tax credit  
868 applications, the Department of Environmental Protection shall  
869 inform the applicant of the department's determination within 90  
870 days after the application is deemed complete. Each eligible tax  
871 credit applicant shall be informed of the amount of its tax  
872 credit and provided with a tax credit certificate that must be  
873 submitted with its tax return to the Department of Revenue to  
874 claim the tax credit or be transferred pursuant to s.  
875 220.1845(2)(f) ~~s. 220.1845(2)(g)~~. Credits may not result in the  
876 payment of refunds if total credits exceed the amount of tax  
877 owed.

878 Section 22. Transitional rules.-

879 (1) For the first taxable year beginning on or after  
880 January 1, 2020, a taxpayer that filed a Florida corporate  
881 income tax return in the preceding taxable year and that is a  
882 member of a water's edge group shall compute its income together  
883 with all members of its water's edge group and file a combined  
884 Florida corporate income tax return with all members of its  
885 water's edge group.

886 (2) An affiliated group of corporations that filed a  
887 Florida consolidated corporate income tax return pursuant to an  
888 election provided in s. 220.131, Florida Statutes 2018, shall

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889 cease filing a Florida consolidated return for taxable years  
890 beginning on or after January 1, 2020, and shall file a combined  
891 Florida corporate income tax return with all members of its  
892 water's edge group.

893 (3) An affiliated group of corporations that filed a  
894 Florida consolidated corporate income tax return pursuant to the  
895 election in s. 220.131(1), Florida Statutes (1985), which  
896 allowed the affiliated group to make an election within 90 days  
897 after December 20, 1984, or upon filing the taxpayer's first  
898 return after December 20, 1984, whichever was later, shall cease  
899 filing a Florida consolidated corporate income tax return using  
900 that method for taxable years beginning on or after January 1,  
901 2020, and shall file a combined Florida corporate income tax  
902 return with all members of its water's edge group.

903 (4) A taxpayer that is not a member of a water's edge  
904 group remains subject to chapter 220, Florida Statutes, and  
905 shall file a separate Florida corporate income tax return as  
906 previously required.

907 (5) For taxable years beginning on or after January 1,  
908 2020, a tax return for a member of a water's edge group must be  
909 a combined Florida corporate income tax return that includes tax  
910 information for all members of the water's edge group. The tax  
911 return must be filed by a member that has a nexus with this  
912 state.

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**T I T L E   A M E N D M E N T**

Remove line 19 and insert:

hurricanes; amending s. 220.03, F.S.; revising the  
definition of the term "taxpayer"; providing  
definitions; amending s. 220.13, F.S.; revising the  
definition of the term "adjusted federal income" to  
prohibit specified deductions, to limit certain  
carryovers, and to require subtractions of certain  
dividends paid and received within a water's edge  
group, for the purpose of determining subtractions  
from taxable income; conforming provisions to changes  
made by the act; repealing s. 220.131, F.S., relating  
to the adjusted federal income of affiliated groups;  
creating s. 220.136, F.S.; specifying circumstances  
under which a corporation is presumed to be, deemed to  
be, or deemed not to be a member of a water's edge  
group; providing construction; defining the term  
"United States"; creating s. 220.1363, F.S.; defining  
the term "water's edge reporting method"; specifying  
requirements for, limitations on, and prohibitions in,  
calculating and reporting income in a water's edge  
group return; requiring all members of a water's edge  
group to use the water's edge reporting method;  
defining the term "sale"; specifying requirements for

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939 | designating the filing member and the taxable year of  
940 | the water's edge group; specifying income reporting  
941 | requirements for certain members of the water's edge  
942 | group; requiring that a water's edge group return  
943 | include a specified computational schedule and  
944 | domestic disclosure spreadsheet; authorizing the  
945 | Department of Revenue to adopt rules; providing  
946 | legislative intent regarding the adoption of rules;  
947 | amending s. 220.14, F.S.; revising the calculation for  
948 | prorating a certain corporate income tax exemption to  
949 | reflect leap years; conforming a provision to changes  
950 | made by the act; amending ss. 220.15, 220.183,  
951 | 220.1845, 220.1875, 220.191, 220.192, 220.193, and  
952 | 220.51, F.S.; conforming provisions to changes made by  
953 | the act; amending s. 220.64, F.S.; providing  
954 | applicability of water's edge group provisions to the  
955 | franchise tax; conforming provisions to changes made  
956 | by the act; amending ss. 288.1254 and 376.30781, F.S.;  
957 | conforming provisions to changes made by the act;  
958 | specifying, beginning on a specified date,  
959 | requirements for corporate tax return filings for  
960 | certain taxpayers; creating s. 220.197, F.S.;

961 | providing a tax

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