

## SCHEDULES

### SCHEDULE 15

#### OIL ACTIVITIES: TRANSFERABLE TAX HISTORY

#### PART 3

##### EFFECT OF A TTH ELECTION ON THE SELLER

###### *Effect of a TTH election: supplementary charge*

- 21 (1) For the purposes of the application of any provision of Part 4 or Part 8 of CTA 2010 in relation to the seller—
- (a) the amount of each ARFP component, or (in the case of the earliest period) an amount equal to the transferred proportion of each ARFP component, for the accounting period is to be disregarded, and
  - (b) in the case of the earliest period, references in those provisions to an ARFP component for the accounting period are to be treated as references to the retained proportion of that ARFP component for the period.
- (2) “ARFP component”, in relation to an accounting period, means—
- (a) the financing costs for the period that are left out of account for the purposes of the assumption mentioned in section 330(3) of CTA 2010, and
  - (b) the amount of any reduction of the seller’s adjusted ring fence profits by reference to the cumulative total amount of activated allowance for the period under any of the following provisions of CTA 2010—
    - (i) section 332E (investment allowance),
    - (ii) section 356D (onshore allowance), and
    - (iii) section 356JG (cluster area allowance).
- (3) See paragraph 17 for provision about disregarding the transferred profits amount for an accounting period.
- (4) Sub-paragraph (1) does not apply in relation to the application of any provision for the purposes of determining the seller’s eligible adjusted ring fence profits for an accounting period for the purposes of this Schedule.