



Rule 3.70 Hypotheticals RRC Workshop

July 24, 2019



Commission Fiscal Years



RRC Fiscal Year	Dates
FY 2021	9/1/2020 – 08/31/2021
FY 2022	9/1/2021 – 08/31/2022
FY 2023	9/1/2022 – 08/31/2023
FY 2024	9/1/2023 – 08/31/2024

Proposed Rule: New Renewal Deadlines



Beginning September 1, 2020 [RRC FY 2021]:

- A-C shall file in February
- D-E shall file in March
- F-L shall file in April
- M-P shall file in May
- Q-T shall file in June
- U-Z and numbers shall file in July

Updated changes to Informal Posting



- Subsection (j): Clarifies that the new renewal timeline does not begin until 9/1/2020 [RRC FY 2021].
- Subsection (k): Clarifies how new permits and transfers will be handled.

Proposed Rule: Permit Renewal Scenario



- **Operator A's** renewal date is October 1
- For *RRC FY 2020*, **Operator A** will renew the permit on 10/1/2019
- On 9/1/2020 [RRC FY 2021], the proposed new renewal timeline takes effect
- For *RRC FY 2021*, **Operator A** will renew the permit and any other permits in February 2021
- For *RRC FY 2022*, **Operator A** will renew the permit and any other permits in February 2022

Proposed Rule: Permit Renewal Scenario



- **Operator Z's** renewal date is January 1
- For *RRC FY 2020*, **Operator Z** will renew the permit on 1/1/2020
- On 9/1/2020 [RRC FY 2021], the proposed new renewal timeline takes effect
- For *RRC FY 2021*, **Operator Z** will renew the permit and any other permits in July 2021
- For *RRC FY 2022*, **Operator Z** will renew the permit and any other permits in July 2022

Proposed Rule: Permit Renewal Scenario



- On 9/1/2020 [RRC FY 2021], the proposed new renewal timeline takes effect
- On 12/1/2020, **Operator A** applies for a new permit and pays the new permit fee
- In February 2021, **Operator A** will NOT pay the renewal fee for its new permit but will pay for all other permits (that were not added in that fiscal year)



- **Operator A's** renewal date is October 1
- For *RRC FY 2020*, **Operator A** will renew its permit on 10/1/2019
- On 1/1/2020, **Operator A** transfers its permit to **Operator M** (who does not consolidate)
- On 9/1/2020 [RRC FY 2021], the proposed new renewal timeline takes effect
- For *RRC FY 2021*, **Operator M** will renew the permit in May 2021



- On 9/1/2020 [*RRC FY 2021*] the proposed new renewal deadline takes effect
- **Operator A** renews its permits in February 2021
- On 4/1/2021, **Operator A** transfers its permit to **Operator M** (who does not consolidate)
- For *RRC FY 2021*, **Operator M** will renew the permit and all other permits in May 2021



- On 9/1/2020, the proposed new renewal deadline takes effect
- On 4/1/2021, **Operator M** transfers its permit to **Operator A**
- **Operator A** will pay the renewal fee upon transfer because its renewal deadline has passed
- For *RRC FY 2022*, **Operator A** will renew the permit and all other permits in February 2022