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State Tax Matters

The power of knowing

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Article/Perspectives
Essential tax and wealth planning guide: 2027 edition

Deloitte's 2027 Essential Tax and Wealth Planning Guide provides an integrated outlook on three drivers of planning: federal tax policy after the One Big Beautiful Bill Act, the generational transfer of wealth, and state tax developments.

The multistate chapter describes how states are taking distinct approaches to taxing wealth, income, and property. California voters rejected Proposition 40, a one-time net worth tax, and approved Proposition 42, a constitutional amendment that prohibits any law that imposes a tax on the ownership or control of retirement holdings, individually owned assets, and other forms of personal savings. New York City enacted an annual surcharge on non-primary residences. The chapter also addresses residency considerations and state taxation of nonresidents' gains on the sale of business interests. Please contact us with any questions.

URL: *https://www.deloitte.com/us/en/services/tax/articles/2027-essential-tax-wealth-planning-guide.html*

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Alert
California FTB ruling assigns sales delivered to distributor hubs outside California

On October 22, 2026, the California Franchise Tax Board (FTB) issued Chief Counsel Ruling 2026-01 (the "Ruling") concluding that the taxpayer's sales to third-party distributors are assigned outside California when the products are delivered to out-of-state hub warehouses and subjected to the warehousing activities described in the Ruling. The distributors' subsequent shipment of products to California does not affect the assignment of the sale. The FTB concluded that shipment terminates at the hub warehouses, where the distributors take possession and store, sort, repackage, and label the products for resale. The Ruling addresses the assignment of sales of tangible personal property for California sales factor purposes under California Revenue and Taxation Code section 25135. The holding addresses taxable years beginning on or after January 1, 2024.

This Multistate Tax Alert summarizes the Ruling.

URL: *us-multistate-tax-alert-california-ftb-ruling-assigns-sales-delivered-to-distributor-hubs-outside-california.pdf*
[Issued November 18, 2026]

Amnesty
Rhode Island – DOR Reminds that Upcoming Amnesty Program Offers Potential 100% Penalty Waiver and Reduced Interest

ADV 2026-22: Event to Help Taxpayers with Complex Compliance Issues Prepare for Tax Amnesty, R.I. Dept. of Rev. (11/12/26); *Tax Amnesty*, R.I. Dept. of Rev. (10/30/26). The Rhode Island Department of Revenue, Division of Taxation (Department) reminds that its upcoming tax amnesty program will run for a 75-day period beginning on December 3, 2026 through February 15, 2027, and generally be open to eligible taxpayers owing any tax (including state corporate income and sales/use taxes) that it imposes [see *H.B. 7127*, *signed by gov. 6/12/26,* and *State Tax Matters, Issue 2026-24*, for more details on the budget legislation enacted earlier this year that authorizes this tax amnesty program]. The Department explains that qualifying taxpayers potentially may receive a waiver of all penalties and 25% reduced interest in exchange for participation and underlying payment of taxes due for any taxable periods ending on or before December 31, 2025.

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Income/Franchise

Alabama – State High Court Agrees to Review Appellate Court Decision that "Subject-to-Tax" Intercompany Expense Addback Exception Did Not Apply

Case No. SC-2026-0815, Ala. (*petition for cert. granted*). The Alabama Supreme Court granted the taxpayer's request to review a 2026 Alabama Court of Civil Appeals ruling that affirmed a 2025 trial court decision and held that Alabama's statutory "subject-to-tax" intercompany addback exception did *not* apply in a case involving whether certain interest paid by an in-state corporate taxpayer to a related member in Ireland was excepted from the addback requirement as being "subject to tax" on the related member's net income in that country [see *Case Nos. CL-2025-0254 and CL-2025-0278*, Ala. Civ. App. (9/4/26) and *State Tax Matters, Issue 2026-36*, for details on the 2026 Alabama Court of Civil Appeals decision in this case]. In the underlying case, certain Luxembourg affiliates ultimately received the interest payments made by the Alabama taxpayer to its Irish affiliate, and it was undisputed that these interest payments were not subject to taxation in Luxembourg. Please contact us with any questions.

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California – Voters Back "Proposition 42" Ballot Measure that Prohibits New State Personal Property Taxes and Certain Retroactive State Taxes, and Reject "Proposition 40" One-Time Net Worth Tax

Proposition 42; *Proposition 40*; *California state ballot measures election results*, *unofficially approved by voters 11/3/26*. In California's recent election held on November 3, 2026, a majority of California voters voted "yes" on "Proposition 42" that, once certified, will amend the State of California Constitution by generally prohibiting new state taxes imposed on the ownership of personal property (*i.e.,* "all things people own other than real estate"), or that applies retroactively based on a taxpayer's past activities.
Specifically, the measure provides:

> "No state law and no provision of this Constitution enacted on or after January 1, 2026, may enact, create, impose, or authorize collection of a tax on the ownership or control of retirement holdings, individually owned assets, and other forms of personal savings, whether held directly or indirectly."

The ballot measure also states:

> "No state law and no provision of this Constitution enacted on or after January 1, 2026, may enact, create, impose, or authorize collection of a tax that operates retroactively to result in tax liability based on conduct, activities, or a status that occurred or was present prior to the effective date of the state law or constitutional provision."

California voters rejected "Proposition 40" (the "Billionaire Tax Act"), which would have imposed a one-time 5% tax on the net worth of individuals who were California residents on January 1, 2026, and had a net worth over $1 billion as of December 31, 2026. Proposition 42 may prohibit a similar net worth tax in the future.

Note that the ballot measure election results are scheduled to be officially certified on December 11, 2026. Please contact us with any questions.

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Maine – Administrative Guidance Explains Implementation of New Elective PTET

Maine Elective Pass-through Entity Tax (PTET), Me. Rev. Serv. (11/26). Newly posted Maine Revenue Services guidance addresses the implementation of legislation enacted earlier this year that permits certain pass-through entities to annually elect to pay a new entity-level income tax (PTET) [see *L.D. 2212 (H.P. 1491)*, ***signed by gov. 4/10/26***, and *State Tax Matters, Issue 2026-15* for more details on this new law], including filing 2026 PTET returns in Maine and making the underlying estimated tax payments. The guidance explains that Maine's PTET program applies for tax years beginning on or after January 1, 2026; clarifies that Maine's PTET applies to each taxable year that an eligible entity elects to be subject to the new tax; and explains that qualified members may claim a refundable income tax credit equal to 90% of their distributive share of the Maine PTET paid.

The guidance further includes information on:

- making a PTET election;
- qualified members;
- calculating the elective PTET;
- a qualified member's distributive share of PTET;
- filing "Form PTET-ME;"
- payments (estimated, annual, and nonresident annual);
- pass-through entity withholding exemptions;
- composite tax return filing exclusions;
- pass-through entity statements to qualified members;
- PTET qualified member income tax credits;
- nonresident qualified member income tax filing exceptions; and
- tax credits for income taxes paid to other taxing jurisdictions.

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New Jersey – CBT Bulletin Addresses Newly Enacted Temporary Cap on NOL Deductions and Potential Penalty and Interest Relief

Tax Bulletin No. TB-118: Temporary Limitations for Net Operating Losses, N.J. Div. of Tax. (11/12/26). The New Jersey Division of Taxation posted a new corporation business tax (CBT) bulletin reflecting legislation enacted earlier this year [see *A.B. 5322* / *S.B. 4536*, *signed by gov. 6/30/26* and *previously issued Multistate Tax Alert* for more details on this legislation] that supplements New Jersey's Corporation Business Tax Act to impose a temporary $1 million cap on the aggregate amount of net operating loss (NOL) deductions claimed by a taxpayer, other than a public utility, in computing entire net income for a privilege period ending on or after July 31, 2026, but before July 31, 2030. Among other topics, the bulletin states that these temporary limitations apply to:

- NOL carryovers;
- combined group NOL carryovers; and
- prior NOL conversion carryovers.

The bulletin clarifies that except for public utilities, the new law "does not establish entity-type exclusions from the temporary NOL limitations," and the statutory amendments do *not* "differentiate between C corporations, S corporations, or QSSS corporations." Accordingly, in general, these temporary limitations (and carryover extensions) apply to all CBT filers, regardless of the filing method, except for public utilities.

The bulletin also explains that New Jersey's new law provides "penalty and interest relief to impacted taxpayers for the underpayment of an installment payment of estimated tax, provided that the installment payment is due and payable after December 31, 2025, but before January 1, 2027; and the underpayment of estimated tax is the result from the temporary NOL limitations." The bulletin notes that such penalty and interest relief "is not an exemption from paying installment payments of estimated payments for any other reason." Please contact us with any questions.

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South Carolina – DOR Posts Guidance on OBBBA Decoupling and Required Adjustments

2026 State Tax Guide to OBBBA's Impact on South Carolina, S.C. Dept. of Rev. (11/26). Newly posted guidance from the South Carolina Department of Revenue (Department) explains how South Carolina has *not* conformed to many Internal Revenue Code (IRC) changes contained in the federal One Big Beautiful Bill Act (commonly referenced as "OBBBA" and more formally as P.L. 119-21), which was enacted on July 4, 2025 – and which contained several federal tax law changes that became effective in 2025, with others taking effect "in 2026 and beyond." According to the Department, its sixteen-page guidance "aims to provide concise and understandable information regarding OBBBA's impact on South Carolina taxpayers and adjustments they may be required to make on their 2026 income tax returns to account for differences in federal and state law." The guidance groups revisions to the IRC pursuant to the OBBBA, as well as their implications for South Carolina taxpayers, into three categories:

- IRC provisions followed by South Carolina that were amended by the OBBBA;
- OBBBA provisions no longer followed by South Carolina due to "state tax reform" adopted in 2026; and
- a reference list of other IRC provisions amended by the OBBBA that South Carolina does *not* follow.

The guidance notes that because the 2026 South Carolina General Assembly did not update South Carolina corporate income tax general conformity to the OBBBA changes made to the IRC in 2025, "South Carolina currently conforms to the IRC as amended through December 31, 2024, prior to the OBBBA changes" [see *S.B. 507 (2025)* and *State Tax Matters, Issue 2025-21*, for details on the most recent South Carolina federal conformity legislation, which was enacted on May 22, 2025 (*i.e.*, prior to the OBBBA's enactment)]. Please contact us with any questions.

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Sales/Use/Indirect

California – CDTFA Proposes Emergency Rules Reflecting Changes in Taxation of Electronically Delivered Digital Products and Prewritten Software

Proposed Emergency Regulations 1502.2, Custom Computer Software; 1600, Application of Sales and Use Tax to Digital Products; 1600.1, Tax Liability Threshold for Digital Products; 1600.2, Digital Products Purchased for Multiple Points of Use; and 1600.3, Digital Products Purchased Solely for Use Outside this State or in Interstate or Foreign Commerce; and Proposed Emergency Amendments to Regulations 1502, Computers, Programs, and Data Processing; 1507, Technology Transfer Agreements; 1699.6, Use Tax Direct Payment Permits; and 1802, Place of Sale and Use for Purposes of Bradley-Burns Uniform Local Sales and Use Taxes, Cal. Dept. of Tax and Fee Admin. (11/18/26); Notice of Emergency Action, Cal. Dept. of Tax and Fee Admin. (11/18/26). The California Department of Tax and Fee Administration (CDTFA) released proposed new and amended emergency regulations that seek to implement, interpret, and make specific changes reflecting legislation enacted earlier this year that amends California sales and use tax law by subjecting to tax beginning as of January 1, 2027, the permanent or temporary transfer of the right to open, view, access, download, copy, update, possess, store, manipulate, or otherwise use certain defined digital products transferred electronically or accessed remotely [see *S.B. 122, signed by gov. 6/29/26*, and *previously issued Multistate Tax Alert* for more details on this legislation] – where such a "digital product" includes non-custom computer software.

Under applicable California law, "at least five working days prior to submission of the proposed emergency action to the Office of Administrative Law (OAL)," the CDTFA must "provide a notice of the proposed emergency action to every person who has filed a request for notice of regulatory action" with the CDTFA. After submission of the proposed emergency action to the OAL, the OAL "shall allow interested persons five calendar days to submit comments on the proposed emergency regulation."

See forthcoming Multistate Tax Alert for more details on this emergency proposal, and please contact us with any questions in the meantime.

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Oklahoma – Inventory Stored at Marketplace Facilitator's In-State Warehouse and Used to Fulfill Direct Orders Did Not Create Nexus for Remote Seller

File No. LR-26-018, Okla. Tax Comm., Office of the General Counsel (11/9/26). A letter ruling issued by the Oklahoma Tax Commission's Office of the General Counsel involving an out-of-state remote seller of tangible personal property making sales through marketplace facilitators and a third-party website generally concluded that, based on the provided facts, the seller lacked physical presence nexus with Oklahoma given that it had no control or management authority over the in-state storage or movement of its inventory at third-party marketplace facilitator warehouses, and despite the fact that the seller asked the marketplace facilitator to fulfill its direct orders from that in-state inventory. The ruling also concluded that the remote seller in this case lacked economic nexus with Oklahoma, because its annual direct aggregate sales of products within Oklahoma fell below the statutory $100,000 threshold.

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Texas – Comptroller Proposes Rule Changes that Exclude Streaming Services from Taxable Cable TV Services

Proposed Amended Title 34 Tex. Admin. Code section 3.313, Tex. Comptroller of Public Accounts (11/20/26); *News Release: Comptroller Huffines Kills Streaming Tax, Lowering Netflix, Hulu, and Prime Video Bills to Make Texas More Affordable*, Tex. Comptroller of Public Accounts (11/17/26). The Texas Comptroller of Public Accounts (Comptroller) is proposing amendments to Title 34 Tex. Admin. Code section 3.313 ("Rule 3.313") concerning cable television services and bundled cable services. The Comptroller's preamble to the proposal explains that these proposed amendments conform the definition of "cable television service" to Texas Tax Code section 151.0033, and clarify that video programming delivered to a purchaser over the internet is *not* a cable television service and that a streaming service is *not* an amusement service under 34 Tex. Admin. Code section 3.298 (relating to "amusement services"), "unless a cable service provider delivers it as part of the programming that it delivers to that purchaser through the provider's cable system." Furthermore, the preamble explains that Texas Tax Code section 151.0033 defines cable television service as the "distribution of video programming with or without use of wires to subscribing or paying customers," and that the Comptroller has determined that the 2014 policy of taxing streaming services "misinterprets" this code section. Accordingly, the Comptroller states that it is proposing to correct this "error" by excluding streaming services from the definition of taxable cable television services. The preamble also notes that these proposed Rule 3.313 changes would apply "prospective only."

The proposed rule defines "streaming service" as a service that delivers video programming to a purchaser over the internet, whether live or on demand, regardless of the type of device the purchaser uses to receive it or how the purchaser pays for it. Additionally, the term would include "video on demand services and subscription services that allow purchasers to choose from a library of available content," but it would *not* include an amusement service as defined in 34 Tex. Admin. Code section 3.298. Comments on the proposal are due 30 days from the November 20, 2026 publication date in the Texas Register.
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Texas – Comptroller Proposes Rule Changes Clarifying that Some Cloud-Based Services and Internet Hosting is Not Taxable Data Processing

Proposed Amended Title 34 Tex. Admin. Code section 3.308, Tex. Comptroller of Public Accounts (11/20/26); *News Release: Comptroller Huffines Kills Tax on Cloud Storage and Website Hosting to Save Texans Money*, Tex. Comptroller of Public Accounts (11/18/26). The Texas Comptroller of Public Accounts (Comptroller) is proposing amendments to Title 34 Tex. Admin. Code section 3.308 ("Rule 3.308") concerning computers – including hardware, computer programs, services, and sales – to, according to the Comptroller's preamble to the proposal, i) clarify the scope of a "data processing service" under Texas Tax Code section 151.0035; and ii) confirm that internet hosting and other hosted technology services are *not* data processing services and are not taxable under Texas Tax Code section 151.0101(a). An accompanying news release explains that these proposed changes would confirm that "internet hosting, cloud computing, artificial intelligence, and other hosted technology services are not taxable data processing services." The preamble notes that these proposed Rule 3.308 changes would apply "prospectively from the date the adoption of this amendment is effective." Comments on the proposal are due 30 days from the November 20, 2026 publication date in the Texas Register. Please contact us with any questions.

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Oregon – City of Eugene Voters Back Measure Requiring Large Retailers to Pay Annual 2% License Fee on In-City Revenue

Measure 20-388; *Measure 20-388 election results*, *unofficially approved by voters 11/3/26*. In Oregon's recent election held on November 3, 2026, a majority of City of Eugene, Oregon (City) voters voted "yes" on a ballot measure that amends the City's code to, beginning as of January 1, 2029, require certain "large retailers" to obtain a license and pay an annual 2% license fee on gross profits from retail sales within the City. The measure generally defines a "large retailer" as one engaged in retail sales in the City, with gross profits exceeding $1 billion "nationally" and $500,000 in the City – but excluding certain contractors, utilities, cooperatives, and credit unions.

Note that the City must enact legislation to implement this license fee, and it is anticipated that this legislation will address several ambiguities raised by brief language of the ballot measure. Please contact us with any questions.

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