

A Calculate leaving entity's ACA  
(allocable cost amount)

B Allocate the result to each of the  
membership interests by dividing the  
result by the number of those  
membership interests

C If there is more than one class of  
membership interest in the leaving  
entity, allocate the ACA to each  
class in proportion to the market  
value of all of the membership  
interests in the class

D Allocate the result to each of the  
membership interests in the class by  
dividing the result by the number of  
those membership interests in the  
class

= Tax cost setting amounts for the  
leaving entity's membership interests

Market  
valuation

## Calculating the exit ACA

1. Start with terminating values of assets that the leaving entity takes with it
2. Add certain inherited deductions not reflected in the terminating value of the assets leaving the group
3. Add intragroup liabilities owed to the leaving entity at the leaving time
4. Subtract liabilities and certain membership interests treated as liabilities for the purpose of this calculation
5. The ACA is the remaining amount (if positive) or nil (if negative)

# Consolidation Reference Manual

**Hongru Du**



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