

SFA APPLICATION AMENDMENT COVER LETTER

CWA/ITU Negotiated Pension Plan

Plan name _____

The following statements must be signed by an authorized trustee who is a current member of the board of trustees.

- (1) By submitting this form, I am seeking expedited review by PBGC of the revised SFA application of the above-named plan.
- (2) I acknowledge that if PBGC, in its discretion, determines that it cannot complete review on an expedited schedule, PBGC's review of the plan's revised application under 29 CFR 4262.11(a) may take up to 120 days after the plan's revised application for SFA is properly and timely filed.
- (3) The plan meets the following requirements:
 - Less than 100 days have elapsed since the plan filed its previous application; and
 - The plan's application filed on July 11, 2023 [filing date] is withdrawn and the plan's revised application is submitted.
- (4) List below the specific corrections that the plan is making in its revised application (if needed, use a separate sheet).

Six "missing" terminated vested participants who died prior to the SFA measurement date were inadvertently included in the Plan's SFA calculation. The revised application reflects removing these 6 TVs and replacing them with 6 beneficiaries.

In addition, additional detail is provided to clarify that the assumption change to Fully value TVs younger than age 85 was completed in the following two steps:

1. Changed from partially valuing (10% alive) to fully valuing (100% alive) Terminated Vested participants past their Required Beginning Date (RBD).
2. Changed late retirement adjustment factor from being valued through date of benefit commencement to being valued through RBD and instead valuing missed payments with interest from RBD to date of benefit commencement.

- (5) Under penalty of perjury under the laws of the United States of America, I declare that I am an authorized trustee who is a current member of the board of trustees of the above named plan and that I have examined this application, including accompanying documents, and, to the best of my knowledge and belief, the application contains all the relevant facts relating to the application, all statements of fact contained in the application are true, correct, and not misleading because of omission of any material fact, and all accompanying documents are what they purport to be.

Arthur De Ianni
Trustee's signature

10/13/2023
Date

Arthur De Ianni, Chairman, Board of Trustees
Trustee's printed name and title

CWA/ITU Negotiated Pension Plan
EIN/Plan No.: 13-6212879/001

***SFA Checklist #33a - Section E, Item (5)
Actuarial Certification of SFA Amount***

We hereby certify that the requested amount of special financial assistance (“SFA”) of \$526,467,008, is the amount to which the CWA/ITU Negotiated Pension Plan (“Plan”) is entitled under section 4262(j)(1) of ERISA and §4262.4 of PBGC's SFA regulation based on a December 31, 2022 SFA measurement date.

This certification is based on the participant data provided by the Plan and used for the actuarial valuation as of January 1, 2022, an SFA measurement date of December 31, 2022, the fair market value of assets as of the SFA measurement date provided by the Plan’s third-party administrator, and the assumptions outlined in the attachment. We performed an informal examination of the obvious characteristics of the data provided for reasonableness and consistency in accordance with Actuarial Standard of Practice No. 23, *Data Quality*.

This certification was prepared in accordance with generally recognized and accepted actuarial principles and practices and our understanding of the Code of Professional Conduct and applicable Actuarial Standards of Practice set out by the Actuarial Standards Board as well as applicable laws and regulations. Furthermore, as credentialed actuaries, we meet the Qualification Standards of the American Academy of Actuaries to render the opinion contained in this certification. This certification does not address any contractual or legal issues. We are not attorneys, and our firm does not provide any legal services or advice.

This certification was prepared exclusively for the CWA/ITU Negotiated Pension Plan and their application for special financial assistance. Other users of this certification are not intended users as defined in the Actuarial Standards of Practice, and Cheiron assumes no duty or liability to such other users.



Christian Benjaminson, FSA, EA, MAAA
Cheiron, Inc.
Principal Consulting Actuary
Enrolled Actuary No: 23-07015
701 East Gate Drive, Suite 330
Mount Laurel, NJ 08054
(703) 893-1456 (ext. 1002)
October 13, 2023

Attachment



Greg Reardon, FSA, EA, MAAA
Cheiron Inc.
Principal Consulting Actuary
Enrolled Actuary No: 23-06866
225 West 34th Street, Floor 9-48
New York, New York 10122
(703) 893-1456 (ext. 1144)
October 13, 2023

CWA/ITU Negotiated Pension Plan
EIN/Plan No.: 13-6212879/001

SFA Checklist #33a - Section E, Item (5)
Actuarial Assumptions Used to Determine SFA Amount

1. Census Data, Basis for Projections

Data used to complete the January 1, 2022 actuarial valuation; see the 2022 Actuarial Valuation Report for a summary of the participant data.

Please note, after completing the 2022 valuation 167 terminated vested participants and 2 deferred beneficiaries were found to be deceased before January 1, 2022 and removed from this analysis. Further, 27 additional terminated vested records were also removed because they are older than 85 on the SFA Measurement Date or they were confirmed deceased before the SFA Measurement Date.

Lastly, six “missing” terminated vested participants who died after the SFA Census Date but before the SFA Measurement Date were inadvertently included in the Plan’ initial SFA application filed on July 11, 2023. This revised application reflects removing these 6 TVs and replacing them with 6 beneficiaries.

2. Interest Rates

Non-SFA Interest Rate: 5.85%; as prescribed under § 4262.4(e)(1)
SFA Interest Rate: 3.77%; as prescribed under § 4262.4(e)(2)

The interest rate used for funding standard account purposes is 6.00%.

3. Administrative Expenses

The administrative expenses for 2023 are assumed to be \$2,543,007 based on two components: (1) regular ongoing administrative expenses of \$2,407,177 and (2) one-time administrative expenses of \$135,830 related to the SFA application. The 2024 administrative expenses are assumed to be \$2,435,902. Expenses are assumed to be payable middle of year.

Further, expected variable administrative expenses (PBGC premiums and other administrative costs based on Plan headcount) were separately projected from fixed administrative expenses. 10% of Non-PBGC Premium related administrative expenses were assumed to be variable costs based on Plan headcount.

Fixed administrative expenses (costs other than PBGC premiums and variable administrative expenses) are assumed to increase by 2.50% per year. PBGC premiums and variable administrative expenses are also assumed to increase by 2.50% per year and multiplied by the projected total Plan headcounts. The PBGC premium is further adjusted to reflect the \$52 flat rate premium for the Plan Year ending December 31, 2031. Finally, the total annual administrative expense in each future plan year is limited to 9% of benefit payments in accordance with PBGC acceptable guidance.

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SFA Checklist #33a - Section E, Item (5)
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4. Rates of Mortality

- Healthy Lives: RP-2014 Healthy Blue Collar Mortality Table, with full generational projection using Scale MP-2016

- Disabled Lives: RP-2014 Disabled Retiree Mortality Table, with full generational projection using Scale MP-2016

Note: Terminated vested participants over age 85 (as of 12/31/2022) are assumed to have died without a surviving spouse and are excluded from the valuation.

5. Rates of Turnover

Terminations of employment for reasons other than death, disability or retirement are assumed to be in accordance with annual rates as shown below for illustrative ages.

| Age | Rate (%) |
|-----|----------|
| 20 | 11.91 |
| 25 | 11.59 |
| 30 | 10.83 |
| 35 | 9.41 |
| 40 | 7.73 |
| 45 | 5.96 |
| 50 | 3.84 |
| 55 | 1.41 |
| 60 | 0.14 |

Turnover rates do not apply on or after early retirement.

6. Rates of Disability

Illustrative rates of disablement are shown below:

| Age | Rate (%) |
|-----|----------|
| 20 | 0.08 |
| 25 | 0.08 |
| 30 | 0.08 |
| 35 | 0.09 |
| 40 | 0.14 |
| 45 | 0.27 |
| 50 | 0.60 |
| 55 | 1.28 |
| 60 | 2.61 |

**CWA/ITU Negotiated Pension Plan
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**SFA Checklist #33a - Section E, Item (5)
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7. Rates of Retirement

| Age* | Rate (%) |
|-------|----------|
| 62 | 30 |
| 63-64 | 15 |
| 65-66 | 30 |
| 67-68 | 25 |
| 69-70 | 20 |
| 71 | 75 |
| 72 | 100 |

**If eligible*

8. Rates of Retirement for Inactive Vested Participants

| Age* | Rate (%) |
|-------|----------|
| 62 | 50 |
| 63-64 | 25 |
| 65 | 55 |
| 66 | 25 |
| 67-71 | 10 |
| 72 | 100 |

**If eligible*

9. Delayed Retirement Factors

Inactive vested participants who are assumed to commence receipt of benefits after attaining normal retirement age are increased 1% per month beyond normal retirement age.

Terminated Vested participants are assumed to receive an actuarially increased benefit for late retirement through their RBD and an accumulated lump sum from their RBD until the date benefit payments commence.

10. Family Composition

65% assumed married with the male spouse three years older than his wife.

11. Form of Benefit

65% of the married population is assumed to elect the 100% joint and survivor form of payment. The remaining population is assumed to elect the life form of payment.

12. Future Active Participant Counts, Contributions, Contribution Base Units (CBUs) and Contribution Rates

**CWA/ITU Negotiated Pension Plan
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**SFA Checklist #33a - Section E, Item (5)
Actuarial Assumptions Used to Determine SFA Amount**

Future Active Participant Counts: assumed to decline 6% per year through 2031 and 1% per year thereafter

Future Contributions = Assumed Future CBUs x Contribution Rates

CBUs for the Plan Year Ending December 31, 2022 were 336,235 shifts. Future CBUs are assumed to decline 6% per year through 2031 and 1% per year thereafter

Future Contribution Rates: the weighted-average contribution rate for 2022 was \$10.717 per shift. The Rehabilitation Plan does not require any contribution rate increases; therefore, this rate is held constant through 2051.

13. Future Withdrawal Liability Payments

81% collectability on already withdrawn employers. We assume 22.8% of the annual decline in CBUs will trigger future withdrawal liability, paid over 20-years, and will be 81% collectible.

14. New Entrant Profile

New entrants are based on the distribution below, assuming 65% male and 35% female. The average contribution per person is 2,188.

| Age | Distribution | Service | Monthly Benefit * |
|-----|--------------|---------|-------------------|
| 23 | 11.7% | 1.0 | \$ 8.78 |
| 27 | 19.2% | 1.0 | 10.75 |
| 32 | 14.0% | 1.0 | 12.15 |
| 38 | 14.1% | 1.2 | 13.28 |
| 42 | 10.4% | 1.1 | 15.83 |
| 48 | 9.8% | 1.4 | 10.43 |
| 53 | 10.2% | 2.3 | 10.97 |
| 57 | 10.6% | 3.8 | 11.91 |

** The monthly benefit for vested-rehires was not considered in the assumption to avoid double-counting liability already valued.*

15. Other

Consistent with guidance the Plan received from the PBGC on June 26, 2023, if a spouse of a deceased terminated-vested participant is unknown or not located, we applied the Plan's marital, spousal age-difference and gender assumptions to value a potential survivor benefit.

The Plan submitted a Voluntary Correction Program ("VCP") application to the Internal Revenue Service in April 2023 to correct a significant operational failure with respect to suspension of benefits notices and actuarial adjustments for late retirement benefit calculations. It is assumed that a one-time corrective payment would be made from the

**CWA/ITU Negotiated Pension Plan
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Plan in January 2024 to all affected participants totaling \$40,138,014 in aggregate. Please see Exhibit II for additional information on the VCP.

Other than Terminated Vested Participants over age 85 as of 12/31/2022 who are assumed to be deceased without a surviving spouse, no other plan participants are excluded from the projections.

There are no assumptions related to reciprocity as the Plan has no reciprocal arrangements.

16. Justification for Actuarial Assumptions

The mortality table and improvement scale remain an appropriate assumption. As described above, we have considered the effect of mortality improvement prior to and subsequent to the measurement date in developing this assumption. Other demographic assumptions are based on historical Plan experience.

Finally, assumptions for administrative expenses, CBUs, withdrawal liability payments, active participants, and new entrants were updated to reflect analysis prepared in conjunction with the Plan's application for special financial assistance.

Application Checklist

v20230727

Instructions for Section E, Item 1 of the Instructions for Filing Requirements for Multiemployer Plans Applying for Special Financial Assistance (SFA):


The Application to PBGC for Approval of Special Financial Assistance Checklist ("Application Checklist" or "Checklist") identifies all information required to be filed with an initial or revised application. For a supplemented application, instead use "Application Checklist - Supplemented." The Application Checklist is not required for a lock-in application.

For a plan required to submit additional information described in Addendum A of the SFA Filing Instructions, also complete Checklist Items #40.a. to #49.b., and if there is a merger as described in Addendum A, also complete Checklist Items #50 through #63.

Applications (including this Application Checklist), with the exception of lock-in applications, must be submitted to PBGC electronically through PBGC's e-Filing Portal, (<https://efilingportal.pbgc.gov/site/>). After logging into the e-Filing Portal, go to the Multiemployer Events section and click "Create New ME Filing." Under "Select a filing type," select "Application for Financial Assistance – Special." Note: revised and supplemented applications must be submitted by selecting "Create New ME Filing."

Note: If you go to the e-Filing Portal and do not see "Application for Financial Assistance – Special" under the "Select a Filing Type," then the e-Filing Portal is temporarily closed and PBGC is not accepting applications (other than lock-in applications) at the time, unless the plan is eligible to make an emergency filing under § 4262.10(f). PBGC's website, www.pbgc.gov, will be updated when the e-Filing Portal reopens for applications. PBGC maintains information on its website at www.pbgc.gov to inform prospective applicants about the current status of the e-Filing portal, as well as to provide advance notice of when PBGC expects to open or temporarily close the e-Filing Portal.

General instructions for completing the Application Checklist:

Complete all items that are shaded: 

If required information was already filed: (1) through PBGC's e-Filing Portal; or (2) through any means for an insolvent plan, a plan that has received a partition, or a plan that submitted an emergency filing, the filer may either upload the information with the application or include a statement in the Plan Comments section of the Application Checklist indicating the date on which and the submission with which the information was previously filed. For any such items previously provided, enter N/A as the **Plan Response**.

For a revised application, the filer may, but is not required to, submit an entire application. For all Application Checklist Items that were previously filed that are not being changed, the filer may include a statement in the Plan Comments section of the Application Checklist to indicate that the other information was previously provided as part of the initial application. For each, enter N/A as the **Plan Response**.

Instructions for specific columns:

Plan Response: Provide a response to each item on the Application Checklist, using only the **Response Options** shown for each Checklist Item.

Name(s) of Files Uploaded: Identify the full name of the file or files uploaded that are responsive to the Checklist Item. The column **Upload as Document Type** provides guidance on the "document type" to select when submitting documents on PBGC's e-Filing Portal.

Page Number Reference(s): For Checklist Items #22 to #29c, submit all information in a single document and identify here the relevant page numbers for each such Checklist Item.

Plan Comments: Use this column to provide explanations for any **Plan Response** that is N/A, to respond as may be specifically identified for Checklist Items, and to provide any optional explanatory comments.

Additional guidance is provided in the following columns:

Upload as Document Type: When uploading documents in PBGC's e-Filing Portal, select the appropriate Document Type for each document that is uploaded. This column provides guidance on the Document Type to select for each Checklist Item. You may upload more than one document using the same Document Type, and there may be Document Types on the e-Filing Portal for which you have no documents to upload.

Required Filenaming (if applicable): For certain Checklist Items, a specified format for naming the file is required.

SFA Instructions Reference: Identifies the applicable section and item number in PBGC's Instructions for Filing Requirements for Multiemployer Plans Applying for Special Financial Assistance.

You must select N/A if a Checklist Item # is not applicable to your application. **Your application will be considered incomplete if No is entered as a Plan Response for any of Checklist Items #1 through #39 on the Application Checklist. If there has been an event as described in § 4262.4(f), complete Checklist Items #40.a. through #49.b., and if there has been a merger described in Addendum A, also complete Checklist Items #50 through #63. Your application will be considered incomplete if No is entered as a Plan Response for any of Checklist Items #40.a. through #49.b. if you are required to complete Checklist Items # 40.a. through #49.b. Your application will also be considered incomplete if No is entered as a Plan Response for any of Checklist Items #50 through #63 if you are required to complete Checklist Items #50 through #63.**

If a Checklist Item # asks multiple questions or requests multiple items, the Plan Response should only be Yes if the plan is providing all information requested for that Checklist Item.

Note, a Yes or No response is also required for Checklist Items #a through #f.

Note, in the case of a plan applying for priority consideration, the plan's application must also be submitted to the Treasury Department. If that requirement applies to an application, PBGC will transmit the application to the Treasury Department on behalf of the plan. See IRS Notice [NOTICE] for further information.

All information and documentation, unless covered by the Privacy Act, that is included in an SFA application may be posted on PBGC's website at www.pbgc.gov or otherwise publicly disclosed, without additional notification. Except to the extent required by the Privacy Act, PBGC provides no assurance of confidentiality in any information included in an SFA application.

Version Updates (newest version at top)

| Version | Date updated | |
|------------|--------------|--|
| v07272023p | 07/27/2023 | Updated checklist to include new Template 10 requirement and reflect changes to eligibility and death audit instructions |
| v20221129p | 11/29/2022 | Updated checklist item 11. for new death audit requirements |

v20220802p

08/02/2022

Fixed some of the shading in the checklist

v20220706p

07/06/2022

Application to PBGC for Approval of Special Financial Assistance (SFA)

v20230727

APPLICATION CHECKLIST

| | |
|-----------------------|---------------------------------|
| Plan name: | CWA/ITU Negotiated Pension Plan |
| EIN: | 13-6212879 |
| PN: | 001 |
| SFA Amount Requested: | \$526,467,008.00 |

Do NOT use this Application Checklist for a supplemented application. Instead use Application Checklist - Supplemented.

-----Filers provide responses here for each Checklist Item:-----

Unless otherwise specified:
YYYY = plan year
Plan Name = abbreviated plan name

Your application will be considered incomplete if No is entered as a Plan Response for any of Checklist Items #1 through #39. In addition, if required to provide information due to a "certain event" (see Addendum A of the SFA Filing Instructions), your application will be considered incomplete if No is entered as a Plan Response for any Checklist Items #40.a. through #49.b. If there is a merger event described in Addendum A, your application will also be considered incomplete if No is entered as a Plan Response for any Checklist Items #50 through #63.

Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

| Checklist Item # | SFA Filing Instructions Reference | Response Options | Plan Response | Name of File(s) Uploaded | Page Number Reference(s) | Plan Comments | In the e-Filing Portal, upload as Document Type | Use this Filenaming Convention |
|--|-----------------------------------|---|------------------|--------------------------|--------------------------|---------------|--|---|
| Plan Information, Checklist, and Certifications | | | | | | | | |
| a. | | Is this application a revised application submitted after the denial of a previously filed application for SFA? | Yes No | No | N/A | N/A | N/A | N/A |
| b. | | Is this application a revised application submitted after a plan has withdrawn its application for SFA that was initially submitted under the interim final rule? | Yes No | No | N/A | N/A | N/A | N/A |
| c. | | Is this application a revised application submitted after a plan has withdrawn its application for SFA that was submitted under the final rule? | Yes No | Yes | N/A | N/A | This revised application is submitted under the new "amendment" process and seeking expedited review. | N/A |
| d. | | Did the plan previously file a lock-in application? | Yes No | Yes | N/A | N/A | Lock-in Filed on 3/24/2023 | N/A |
| e. | | Has this plan been terminated? | Yes No | No | N/A | N/A | N/A | N/A |
| f. | | Is this plan a MPRA plan as defined under § 4262.4(a)(3) of PBGC's SFA regulation? | Yes No | No | N/A | N/A | N/A | N/A |
| 1. | Section B, Item (1)a. | Does the application include the most recent plan document or restatement of the plan document and all amendments adopted since the last restatement (if any)? | Yes No | Yes | previously provided | N/A | See file "2015 09 NPP Plan Document 9 2015 w Amend thru 2020.pdf" provided with our initial application (7/11/2023) | Pension plan documents, all versions available, and all amendments signed and dated |
| 2. | Section B, Item (1)b. | Does the application include the most recent trust agreement or restatement of the trust agreement, and all amendments adopted since the last restatement (if any)? | Yes No | Yes | previously provided | N/A | See file "2020 09 NPP Trust Agreement with Jan 2023 Amendment.pdf" provided with our initial application (7/11/2023) | Pension plan documents, all versions available, and all amendments signed and dated |
| 3. | Section B, Item (1)c. | Does the application include the most recent IRS determination letter? Enter N/A if the plan does not have a determination letter. | Yes No N/A | Yes | previously provided | N/A | See file "NPP Determination Letter 10 24 2011.pdf" provided with our initial application (7/11/2023) | Pension plan documents, all versions available, and all amendments signed and dated |
| 4. | Section B, Item (2) | Does the application include the actuarial valuation report for the 2018 plan year and each subsequent actuarial valuation report completed before the filing date of the initial application? Enter N/A if no actuarial valuation report was prepared because it was not required for any requested year. Is each report provided as a separate document using the required filename convention? | Yes No N/A | Yes | previously provided | N/A | 5 reports were provided with our initial application (7/11/2023): 2018AVR NPP.pdf 2019AVR NPP.pdf 2020AVR NPP.pdf 2021AVR NPP.pdf 2022AVR NPP.pdf | Most recent actuarial valuation for the plan |
| 5.a. | | Does the application include the most recent rehabilitation plan (or funding improvement plan, if applicable), including all subsequent amendments and updates, and the percentage of total contributions received under each schedule of the rehabilitation plan or funding improvement plan for the most recent plan year available? | Yes No | Yes | previously provided | N/A | 100% elected the Preferred Schedule See file "2010 01 NPP Summary of Rehab Plan.pdf" provided with our initial application (7/11/2023) | Rehabilitation plan (or funding improvement plan, if applicable) |

Application to PBGC for Approval of Special Financial Assistance (SFA)

v20230727

APPLICATION CHECKLIST

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|-----------------------|---------------------------------|
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 Plan Name = abbreviated plan name

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Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

| Checklist Item # | SFA Filing Instructions Reference | | Response Options | Plan Response | Name of File(s) Uploaded | Page Number Reference(s) | Plan Comments | In the e-Filing Portal, upload as Document Type | Use this Filenaming Convention |
|------------------|-----------------------------------|--|------------------|---------------|--|--------------------------|--|--|--|
| 5.b. | Section B, Item (5) | If the most recent rehabilitation plan does not include historical documentation of rehabilitation plan changes (if any) that occurred in calendar year 2020 and later, does the application include an additional document with these details? Enter N/A if the historical document is contained in the rehabilitation plans. | Yes No N/A | N/A | | N/A | | Rehabilitation plan (or funding improvement plan, if applicable) | N/A |
| 6. | Section B, Item (4) | Does the application include the plan's most recently filed (as of the filing date of the initial application) Form 5500 (Annual Return/Report of Employee Benefit Plan) and all schedules and attachments (including the audited financial statement)? Is the 5500 filing provided as a single document using the required filename convention? | Yes No | Yes | previously provided | N/A | See file "2021Form5500 NPP.pdf" provided with our initial application (7/11/2023) | Latest annual return/report of employee benefit plan (Form 5500) | YYYYForm5500 Plan Name |
| 7.a. | | Does the application include the plan actuary's certification of plan status ("zone certification") for the 2018 plan year and each subsequent annual certification completed before the filing date of the initial application? Enter N/A if the plan does not have to provide certifications for any requested plan year. Is each zone certification (including the additional information identified in Checklist Items #7.b. and #7.c. below, if applicable) provided as a single document, separately for each plan year, using the required filename convention? | Yes No N/A | Yes | previously provided | N/A | 6 zone certifications are provided with our initial application (7/11/2023): 2018Zone20180330 NPP.pdf 2019Zone20190329 NPP.pdf 2020Zone20200330 NPP.pdf 2021Zone20210331 NPP.pdf 2022Zone20220331 NPP.pdf 2023Zone20230331 NPP.pdf | Zone certification | YYYYZoneYYYYMMDD Plan Name, where the first "YYYY" is the applicable plan year, and "YYYYMMDD" is the date the certification was prepared. |
| 7.b. | Section B, Item (5) | Does the application include documentation for all zone certifications that clearly identifies all assumptions used including the interest rate used for funding standard account purposes? If such information is provided in an addendum, addendums are only required for the most recent actuarial certification of plan status completed before January 1, 2021 and each subsequent annual certification. Is this information included in the single document in Checklist Item #7.a. for the applicable plan year? | Yes No N/A | Yes | N/A - include as part of documents in Checklist Item #7.a. | N/A | | N/A - include as part of documents in Checklist Item #7.a. | N/A - included in a single document for each plan year - See Checklist Item #7.a. |
| 7.c. | | For a certification of critical and declining status, does the application include the required plan-year-by-plan-year projection (showing the items identified in Section B, Item (5)a. through (5)f. of the SFA Instructions) demonstrating the plan year that the plan is projected to become insolvent? If required, is this information included in the single document in Checklist Item #7.a. for the applicable plan year? Enter N/A if the plan entered N/A for Checklist Item #7.a. or if the application does not include a certification of critical and declining status. | Yes No N/A | Yes | N/A - include as part of documents in Checklist Item #7.a. | N/A | | N/A - include as part of documents in Checklist Item #7.a. | N/A - included in a single document for each plan year - See Checklist Item #7.a. |

Application to PBGC for Approval of Special Financial Assistance (SFA)

v20230727

APPLICATION CHECKLIST

| | |
|-----------------------|---------------------------------|
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Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

| Checklist Item # | SFA Filing Instructions Reference | | Response Options | Plan Response | Name of File(s) Uploaded | Page Number Reference(s) | Plan Comments | In the e-Filing Portal, upload as Document Type | Use this Filenaming Convention |
|------------------|-----------------------------------|---|------------------|---------------|---|--------------------------|--|---|---|
| 8. | Section B, Item (6) | Does the application include the most recent account statements for each of the plan's cash and investment accounts? Insolvent plans may enter N/A, and identify in the Plan Comments that this information was previously submitted to PBGC and the date submitted. | Yes No N/A | Yes | previously provided | N/A | 18 financial statements are provided See file "Bank and Inv Accounts NPP.pdf" provided with our initial application (7/11/2023) | Bank/Asset statements for all cash and investment accounts | N/A |
| 9. | Section B, Item (7) | Does the application include the most recent plan financial statement (audited, or unaudited if audited is not available)? Insolvent plans may enter N/A, and identify in the Plan Comments that this information was previously submitted to PBGC and the date submitted. | Yes No N/A | Yes | previously provided | N/A | See file "SKR - CWA ITU NPP Audited Financials 2021.pdf" provided with our initial application (7/11/2023) | Plan's most recent financial statement (audited, or unaudited if audited not available) | N/A |
| 10. | Section B, Item (8) | Does the application include all of the plan's written policies and procedures governing the plan's determination, assessment, collection, settlement, and payment of withdrawal liability? Are all such items included as a single document using the required filenaming convention? | Yes No N/A | Yes | previously provided | N/A | See file "WDL NPP.pdf" provided with our initial application (7/11/2023) | Pension plan documents, all versions available, and all amendments signed and dated | WDL Plan Name |
| 11.a. | Section B, Item (9)a. | Does the application include documentation of a death audit to identify deceased participants that was completed on the census data used for SFA purposes, including identification of the service provider conducting the audit, date performed, the participant counts (provided separately for current retirees and beneficiaries, current terminated vested participants not yet in pay status, and current active participants) run through the death audit, and a copy of the results of the audit provided to the plan administrator by the service provider? If applicable, has personally identifiable information in this report been redacted prior to submission to PBGC? Is this information included as a single document using the required filenaming convention? | Yes No | Yes | previously provided | N/A | See file "Death Audit NPP.pdf" provided with our initial application (7/11/2023) | Pension plan documents, all versions available, and all amendments signed and dated | Death Audit Plan Name |
| 11.b. | | If any known deaths occurred before the date of the census data used for SFA purposes, is a statement certifying these deaths were reflected for SFA calculation purposes provided? | Yes No N/A | Yes | N/A - include as part of documents in Checklist Item #11.a. | N/A | | N/A | N/A - include as part of documents in Checklist Item #11.a. |
| 11.c. | Section B, Item (9)b. | Does the application include full census data (Social Security Number and name) of all terminated vested participants that were included in the SFA projections? Is this information provided in Excel, or in an Excel-compatible format? | Yes No N/A | Yes | N/A | N/A | Listing was provided to PBGC on 6/12/2023, in advance of the initial SFA application (7/11/2023). | Submit the data file and the date of the census data through PBGC's secure file transfer system, Leapfile. Go to http://pbgc.leapfile.com , click on "Secure Upload" and then enter sfa@pbgc.gov as the recipient email address and upload the file(s) for | Include as the subject "Submission of Terminated Vested Census Data for (Plan Name)," and as the memo "(Plan Name) terminated vested census data dated (date of census data) through Leapfile for independent audit by PBGC." |

Application to PBGC for Approval of Special Financial Assistance (SFA)

v20230727

APPLICATION CHECKLIST

| | |
|-----------------------|---------------------------------|
| Plan name: | CWA/ITU Negotiated Pension Plan |
| EIN: | 13-6212879 |
| PN: | 001 |
| SFA Amount Requested: | \$526,467,008.00 |

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Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

| Checklist Item # | SFA Filing Instructions Reference | | Response Options | Plan Response | Name of File(s) Uploaded | Page Number Reference(s) | Plan Comments | In the e-Filing Portal, upload as Document Type | Use this Filenaming Convention |
|------------------|-----------------------------------|--|------------------|---------------|--------------------------|--------------------------|---|---|--------------------------------|
| 12. | Section B, Item (10) | Does the application include information required to enable the plan to receive electronic transfer of funds if the SFA application is approved, including (if applicable) a notarized payment form? See SFA Instructions, Section B, Item (10). | Yes No | Yes | previously provided | N/A | See file "Bank Information NPP.pdf" provided with our initial application (7/11/2023) | Other | N/A |
| 13. | Section C, Item (1) | Does the application include the plan's projection of expected benefit payments that should have been attached to the Form 5500 Schedule MB in response to line 8b(1) on the Form 5500 Schedule MB for plan years 2018 through the last year the Form 5500 was filed by the filing date of the initial application? Enter N/A if the plan is not required to respond Yes to line 8b(1) on the Form 5500 Schedule MB. See Template 1. Does the uploaded file use the required filenaming convention? | Yes No N/A | Yes | previously provided | N/A | See file "Template 1 NPP.xlsx" provided with our initial application (7/11/2023) | Financial assistance spreadsheet (template) | Template 1 Plan Name |
| 14. | Section C, Item (2) | If the plan was required to enter 10,000 or more participants on line 6f of the most recently filed Form 5500 (by the filing date of the initial application), does the application include a current listing of the 15 largest contributing employers (the employers with the largest contribution amounts) and the amount of contributions paid by each employer during the most recently completed plan year before the filing date of the initial application (without regard to whether a contribution was made on account of a year other than the most recently completed plan year)? If this information is required, it is required for the 15 largest contributing employers even if the employer's contribution is less than 5% of total contributions. Enter N/A if the plan is not required to provide this information. See Template 2. Does the uploaded file use the required filenaming convention? | Yes No N/A | Yes | previously provided | N/A | See file "Template 2 NPP.xlsx" provided with our initial application (7/11/2023) | Contributing employers | Template 2 Plan Name |
| 15. | Section C, Item (3) | Does the application include historical plan information for the 2010 plan year through the plan year immediately preceding the date the plan's initial application was filed that separately identifies: total contributions, total contribution base units (including identification of the unit used), average contribution rates, and number of active participants at the beginning of each plan year? For the same period, does the application show all other sources of non-investment income such as withdrawal liability payments collected, reciprocity contributions (if applicable), additional contributions from the rehabilitation plan (if applicable), and other identifiable sources of contributions? See Template 3. Does the uploaded file use the required filenaming convention? | Yes No | Yes | previously provided | N/A | See file "Template 3 NPP.xlsx" provided with our initial application (7/11/2023) | Historical Plan Financial Information (CBUs, contribution rates, contribution amounts, withdrawal liability payments) | Template 3 Plan Name |

Application to PBGC for Approval of Special Financial Assistance (SFA)

v20230727

APPLICATION CHECKLIST

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|-----------------------|---------------------------------|
| Plan name: | CWA/ITU Negotiated Pension Plan |
| EIN: | 13-6212879 |
| PN: | 001 |
| SFA Amount Requested: | \$526,467,008.00 |

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Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

| Checklist Item # | SFA Filing Instructions Reference | | Response Options | Plan Response | Name of File(s) Uploaded | Page Number Reference(s) | Plan Comments | In the e-Filing Portal, upload as Document Type | Use this Filenaming Convention |
|------------------|---|---|------------------|---------------|---|--------------------------|---|--|---|
| 16.a. | Section C, Items (4)a., (4)e., and (4)f. | Does the application include the information used to determine the amount of SFA for the plan using the <u>basic method</u> described in § 4262.4(a)(1) based on a deterministic projection and using the actuarial assumptions as described in § 4262.4(e)? See Template 4A, <i>4A-4 SFA Details .4(a)(1)</i> sheet and Section C, Item (4) of the SFA Filing Instructions for more details on these requirements. Does the uploaded file use the required filenaming convention? | Yes No | Yes | Template 4A NPP -- Updated 20230929s.xlsx | N/A | This is the same file as provided on 9/29/2023. | Projections for special financial assistance (estimated income, benefit payments and expenses) | Template 4A Plan Name |
| 16.b.i. | Addendum D Section C, Item (4)a. - MPRA plan information A. Addendum D Section C, Item (4)e. - MPRA plan information A. | If the plan is a MPRA plan, does the application also include the information used to determine the amount of SFA for the plan using the <u>increasing assets method</u> described in § 4262.4(a)(2)(i) based on a deterministic projection and using the actuarial assumptions as described in § 4262.4(e)? See Template 4A, <i>4A-5 SFA Details .4(a)(2)(i)</i> sheet and Addendum D for more details on these requirements. Enter N/A if the plan is not a MPRA Plan. | Yes No N/A | N/A | N/A - included as part of Template 4A Plan Name | N/A | | N/A | N/A - included in Template 4A Plan Name |
| 16.b.ii. | Addendum D Section C, Item (4)f. - MPRA plan information A. | If the plan is a MPRA plan for which the requested amount of SFA is determined using the <u>increasing assets method</u> described in § 4262.4(a)(2)(i), does the application also explicitly identify the projected SFA exhaustion year based on the <u>increasing assets method</u> ? See Template 4A, <i>4A-5 SFA Details .4(a)(2)(i)</i> sheet and Addendum D. Enter N/A if the plan is not a MPRA Plan or if the requested amount of SFA is determined based on the present value method. | Yes No N/A | N/A | N/A - included as part of Template 4A Plan Name | N/A | | N/A | N/A - included in Template 4A Plan Name |
| 16.b.iii. | Addendum D Section C, Item (4)a. - MPRA plan information B. Addendum D Section C, Item (4)e. (4)f., and (4)g. - MPRA plan information B. | If the plan is a MPRA plan for which the requested amount of SFA is determined using the <u>present value method</u> described in § 4262.4(a)(2)(ii), does the application also include the information for such plans as shown in Template 4B, including <i>4B-1 SFA Ben Pmts</i> sheet, <i>4B-2 SFA Details 4(a)(2)(ii)</i> sheet, and <i>4B-3 SFA Exhaustion</i> sheet? See Addendum D and Template 4B. Enter N/A if the plan is not a MPRA Plan or if the requested amount of SFA is determined based on the increasing assets method. | Yes No N/A | N/A | | N/A | | N/A | Template 4B Plan Name |
| 16.c. | Section C, Items (4)b. and (4)c. | Does the application include identification of the non-SFA interest rate and the SFA interest rate, including details on how each was determined? See Template 4A, <i>4A-1 Interest Rates</i> sheet. | Yes No | Yes | N/A - included as part of Template 4A Plan Name | N/A | | N/A | N/A - included in Template 4A Plan Name |

Application to PBGC for Approval of Special Financial Assistance (SFA)

v20230727

APPLICATION CHECKLIST

| | |
|-----------------------|---------------------------------|
| Plan name: | CWA/ITU Negotiated Pension Plan |
| EIN: | 13-6212879 |
| PN: | 001 |
| SFA Amount Requested: | \$526,467,008.00 |

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Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

| Checklist Item # | SFA Filing Instructions Reference | | Response Options | Plan Response | Name of File(s) Uploaded | Page Number Reference(s) | Plan Comments | In the e-Filing Portal, upload as Document Type | Use this Filenaming Convention |
|------------------|--|---|------------------|---------------|---|--------------------------|---|--|---|
| 16.d. | Section C, Item (4).e.ii. | For each year in the SFA coverage period, does the application include the projected benefit payments (excluding make-up payments, if applicable), separately for current retirees and beneficiaries, current terminated vested participants not yet in pay status, current active participants, and new entrants? See Template 4A, 4A-2 SFA Ben Pmts sheet. | Yes No | Yes | N/A - included as part of Template 4A Plan Name | N/A | | N/A | N/A - included in Template 4A Plan Name |
| 16.e. | Section C, Item (4).e.iv. and (4).e.v. | For each year in the SFA coverage period, does the application include a breakdown of the administrative expenses between PBGC premiums and all other administrative expenses? Does the application include the projected total number of participants at the beginning of each plan year in the SFA coverage period? See Template 4A, 4A-3 SFA Pcount and Admin Exp sheet. | Yes No | Yes | N/A - included as part of Template 4A Plan Name | N/A | | N/A | N/A - included in Template 4A Plan Name |
| 17.a. | Section C, Item (5) | For a plan that is not a MPRA plan, does the application include a separate deterministic projection ("Baseline") in the same format as Checklist Items #16.a., #16.d., and #16.e. that shows the amount of SFA that would be determined using the <u>basic method</u> if the assumptions/methods used are the same as those used in the most recent actuarial certification of plan status completed before January 1, 2021 ("pre-2021 certification of plan status") excluding the plan's non-SFA interest rate and SFA interest rate, which should be the same as in Checklist Item #16.a.? See Section C, Item (5) of the SFA Filing Instructions for other potential exclusions from this requirement. If (a) the plan is a MPRA plan, or if (b) this item is not required for a plan that is not a MPRA plan, enter N/A. If entering N/A due to (b), add information in the Plan Comments to explain why this item is not required. Does the uploaded file use the required filenaming convention? | Yes No N/A | Yes | previously provided | N/A | See file "Template 5A NPP.xlsx" provided with our initial application (7/11/2023) | Projections for special financial assistance (estimated income, benefit payments and expenses) | Template 5A Plan Name |
| 17.b. | Addendum D Section C, Item (5) | For a MPRA plan for which the requested amount of SFA is determined using the <u>increasing assets method</u> , does the application include a separate deterministic projection ("Baseline") in the same format as Checklist Items #16.b.i., #16.d., and #16.e. that shows the amount of SFA that would be determined using the <u>increasing assets method</u> if the assumptions/methods used are the same as those used in the most recent actuarial certification of plan status completed before January 1, 2021 ("pre-2021 certification of plan status") excluding the plan's non-SFA interest rate and SFA interest rate, which should be the same as used in Checklist Item #16.b.i.? See Section C, Item (5) of the SFA Filing Instructions for other potential exclusions from this requirement. Also see Addendum D. If the plan is (a) not a MPRA plan, (b) a MPRA plan using the present value method, or (c) is otherwise not required to provide this item, enter N/A. If entering N/A due to (c), add information in the Plan Comments to explain why this item is not required. Does the uploaded file use the required filenaming convention? | Yes No N/A | N/A | | N/A | | Projections for special financial assistance (estimated income, benefit payments and expenses) | Template 5A Plan Name |

Application to PBGC for Approval of Special Financial Assistance (SFA)

v20230727

APPLICATION CHECKLIST

| | |
|-----------------------|---------------------------------|
| Plan name: | CWA/ITU Negotiated Pension Plan |
| EIN: | 13-6212879 |
| PN: | 001 |
| SFA Amount Requested: | \$526,467,008.00 |

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Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

| Checklist Item # | SFA Filing Instructions Reference | | Response Options | Plan Response | Name of File(s) Uploaded | Page Number Reference(s) | Plan Comments | In the e-Filing Portal, upload as Document Type | Use this Filenaming Convention |
|------------------|-----------------------------------|---|------------------|---------------|--|--------------------------|---|--|--------------------------------|
| 17.c. | Addendum D Section C, Item (5) | For a MPRA plan for which the requested amount of SFA is determined using the <u>present value method</u> , does the application include a separate deterministic projection ("Baseline") in the same format as Checklist Item #16.b.iii. that shows the amount of SFA that would be determined using the <u>present value method</u> if the assumptions used/methods are the same as those used in the most recent actuarial certification of plan status completed before January 1, 2021 ("pre-2021 certification of plan status") excluding the plan's SFA interest rate which should be the same as used in Checklist Item #16.b.iii. See Section C, Item (5) of the SFA Filing Instructions for other potential exclusions from this requirement. Also see Addendum D. If the plan is (a) not a MPRA plan, (b) a MPRA plan using the increasing assets method, or (c) is otherwise not required to provide this item, enter N/A. If entering N/A due to (c), add information in the Plan Comments to explain why this item is not required. Has this document been uploaded using the required filenaming convention? | Yes No N/A | N/A | | N/A | | Projections for special financial assistance (estimated income, benefit payments and expenses) | Template 5B Plan Name |
| 18.a. | Section C, Item (6) | For a plan that is not a MPRA plan, does the application include a reconciliation of the change in the total amount of requested SFA due to each change in assumption/method from the Baseline to the requested SFA amount? Does the application include a deterministic projection and other information for each assumption/method change, in the same format as Checklist Item #16.a? Enter N/A if the plan is not required to provide Baseline information in Checklist Item #17.a. Enter N/A if the requested SFA amount in Checklist Item #16.a. is the same as the amount shown in the Baseline details of Checklist Item #17.a. See Section C, Item (6) of the SFA Filing Instructions for other potential exclusions from this requirement. If the plan is a MPRA plan, enter N/A. If the plan is otherwise not required to provide this item, enter N/A and provide an explanation in the Plan Comments. Does the uploaded file use the required filenaming convention? | Yes No N/A | Yes | Template 6A NPP -- Updated v2 20231009s.xlsx | N/A | This is the same file as provided on 10/9/2023. | Projections for special financial assistance (estimated income, benefit payments and expenses) | Template 6A Plan Name |

Application to PBGC for Approval of Special Financial Assistance (SFA)

v20230727

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| EIN: | 13-6212879 |
| PN: | 001 |
| SFA Amount Requested: | \$526,467,008.00 |

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Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

| Checklist Item # | SFA Filing Instructions Reference | | Response Options | Plan Response | Name of File(s) Uploaded | Page Number Reference(s) | Plan Comments | In the e-Filing Portal, upload as Document Type | Use this Filenaming Convention |
|------------------|-----------------------------------|--|------------------|---------------|--------------------------|--------------------------|---------------|--|--------------------------------|
| 18.b. | Addendum D Section C, Item (6) | For a MPRA plan for which the requested amount of SFA is based on the <u>increasing assets method</u> , does the application include a reconciliation of the change in the total amount of requested SFA using the <u>increasing assets method</u> due to each change in assumption/method from the Baseline to the requested SFA amount? Does the application include a deterministic projection and other information for each assumption/method change, in the same format as Checklist Item #16.b.i.? Enter N/A if the plan is not required to provide Baseline information in Checklist Item #17.b. Enter N/A if the requested SFA amount in Checklist Item #16.b.i. is the same as the amount shown in the Baseline details of Checklist Item #17.b. See Addendum D. See Section C, Item (6) of the SFA Filing Instructions for other potential exclusions from this requirement, and enter N/A if this item is not otherwise required. If the plan is (a) not a MPRA plan, (b) a MPRA plan using the present value method, or (c) is otherwise not required to provide this item, enter N/A. If entering N/A due to (c), add information in the Plan Comments to explain why this item is not required. Does the uploaded file use the required filenaming convention? | Yes No N/A | N/A | | N/A | | Projections for special financial assistance (estimated income, benefit payments and expenses) | Template 6A Plan Name |
| 18.c. | Addendum D Section C, Item (6) | For a MPRA plan for which the requested amount of SFA is based on the <u>present value method</u> , does the application include a reconciliation of the change in the total amount of requested SFA using the <u>present value method</u> due to each change in assumption/method from Baseline to the requested SFA amount? Does the application include a deterministic projection and other information for each assumption/method change, in the same format as Checklist Item #16.b.iii.? See Section C, Item (6) of the SFA Filing Instructions for other potential exclusions from this requirement. Also see Addendum D. If the plan is (a) not a MPRA plan, (b) a MPRA plan using the increasing assets method, or (c) is otherwise not required to provide this item, enter N/A. If entering N/A due to (c), add information in the Plan Comments to explain why this item is not required. Has this document been uploaded using the required filenaming convention? | Yes No N/A | N/A | | N/A | | Projections for special financial assistance (estimated income, benefit payments and expenses) | Template 6B Plan Name |

Application to PBGC for Approval of Special Financial Assistance (SFA)

v20230727

APPLICATION CHECKLIST

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Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

| Checklist Item # | SFA Filing Instructions Reference | | Response Options | Plan Response | Name of File(s) Uploaded | Page Number Reference(s) | Plan Comments | In the e-Filing Portal, upload as Document Type | Use this Filenaming Convention |
|------------------|-----------------------------------|--|------------------|---------------|--------------------------|--------------------------|--|--|--------------------------------|
| 19.a. | Section C, Item (7)a. | For plans eligible for SFA under § 4262.3(a)(1) or § 4262.3(a)(3), does the application include a table identifying which assumptions/methods used in determining the plan's eligibility for SFA differ from those used in the pre-2021 certification of plan status, and does that table include brief explanations as to why using those assumptions/methods is no longer reasonable and why the changed assumptions/methods are reasonable (an abbreviated version of information provided in Checklist Item #28.a.)? Enter N/A if the plan is eligible for SFA under § 4262.3(a)(2) or § 4262.3(a)(4) or if the plan is eligible based on a certification of plan status completed before 1/1/2021. Also enter N/A if the plan is eligible based on a certification of plan status completed after 12/31/2020 but that reflects the same assumptions as those in the pre-2021 certification of plan status. See Template 7, 7a Assump Changes for Elig sheet. Does the uploaded file include both Checklist Items #19.a. and #19.b., and does it use the required filenaming convention? | Yes No N/A | N/A | | N/A | | Financial assistance spreadsheet (template) | Template 7 Plan Name. |
| 19.b. | Section C, Item (7)b. | Does the application include a table identifying which assumptions/methods used to determine the requested SFA differ from those used in the pre-2021 certification of plan status (except the interest rates used to determine SFA)? Does this item include brief explanations as to why using those original assumptions/methods is no longer reasonable and why the changed assumptions/methods are reasonable? If a changed assumption is an extension of the CBU assumption or the administrative expenses assumption as described in Paragraph A "Adoption of assumptions not previously factored into pre-2021 certification of plan status" of Section III, Acceptable Assumption Changes of PBGC's SFA assumptions guidance, does the application state so? This should be an abbreviated version of information provided in Checklist Item #28.b. See Template 7, 7b Assump Changes for Amount sheet. Does the uploaded file include both Checklist Items #19.a. and #19.b., and does it use the required filenaming convention? | Yes No | Yes | previously provided | N/A | See file "Template 7 NPP.xlsx" provided with our initial application (7/11/2023) | Financial assistance spreadsheet (template) | Template 7 Plan Name |
| 20.a. | Section C, Item (8) | Does the application include details of the projected contributions and withdrawal liability payments used to calculate the requested SFA amount, including total contributions, contribution base units (including identification of base unit used), average contribution rate(s), reciprocity contributions (if applicable), additional contributions from the rehabilitation plan (if applicable), and any other identifiable contribution streams? See Template 8. | Yes No | Yes | previously provided | N/A | See file "Template 8 NPP.xlsx" provided with our initial application (7/11/2023) | Projections for special financial assistance (estimated income, benefit payments and expenses) | Template 8 Plan Name |

Application to PBGC for Approval of Special Financial Assistance (SFA)

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Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

| Checklist Item # | SFA Filing Instructions Reference | | Response Options | Plan Response | Name of File(s) Uploaded | Page Number Reference(s) | Plan Comments | In the e-Filing Portal, upload as Document Type | Use this Filenaming Convention |
|------------------|-----------------------------------|---|------------------|---------------|--|--------------------------|--|---|---|
| 20.b. | Section C, Item (9) | Does the application separately show the amounts of projected withdrawal liability payments for employers that are currently withdrawn as of the date the initial application is filed, and assumed future withdrawals? Does the application also provide the projected number of active participants at the beginning of each plan year? See Template 8. | Yes No | Yes | N/A - include as part of Checklist Item #20.a. | N/A | | N/A | N/A - included in <i>Template 8 Plan Name</i> |
| 21. | Section C, Item (10) | Does the application provide a table identifying and describing all assumptions and methods used in i) the pre-2021 certification of plan status, ii) the "Baseline" projection in Section C Item (5), and iii) the determination of the amount of SFA in Section C Item (4)? Does the table state if each changed assumption falls under Section III, Acceptable Assumption Changes, or Section IV, Generally Accepted Assumption Changes, in PBGC's SFA assumptions guidance, or if it should be considered an "Other Change"? Does the uploaded file use the required filenaming convention? | Yes No | Yes | Template 10 NPP.xlsx | N/A | | Financial assistance spreadsheet (template) | Template 10 Plan Name |
| 22. | Section D | Was the application signed and dated by an authorized trustee who is a current member of the board of trustees or another authorized representative of the plan sponsor and include the printed name and title of the signer? | Yes No | Yes | previously provided | Page 1 | Identify here the name of the single document that includes all information requested in Section D of the SFA Filing Instructions (Checklist Items #21 through #28.c). See file "SFA App NPP.pdf" provided with our initial application (7/11/2023) | Financial Assistance Application | SFA App Plan Name |
| 23.a. | Section D, Item (1) | For a plan that is not a MPRA plan, does the application include an optional cover letter? Enter N/A if the plan is a MPRA plan, or if the plan is not a MPRA plan and did not include an optional cover letter. | Yes N/A | Yes | N/A - included as part of SFA App Plan Name | Page 2 | For each Checklist Item #21 through #28.c., identify the relevant page number(s) within the single document. | N/A | N/A - included as part of SFA App Plan Name |
| 23.b. | | For a plan that is a MPRA plan, does the application include a cover letter? Does the cover letter identify the calculation method (basic method, increasing assets method, or present value method) that provides the greatest amount of SFA? For a MPRA plan with a partition, does the cover letter include a statement that the plan has been partitioned under section 4233 of ERISA? Enter N/A if the plan is not a MPRA plan. | Yes No N/A | N/A | N/A - included as part of SFA App Plan Name | | | N/A | N/A - included as part of SFA App Plan Name |
| 24. | Section D, Item (2) | Does the application include the name, address, email, and telephone number of the plan sponsor, plan sponsor's authorized representative, and any other authorized representatives? | Yes No | Yes | N/A - included as part of SFA App Plan Name | Page 3 | | N/A | N/A - included as part of SFA App Plan Name |

Application to PBGC for Approval of Special Financial Assistance (SFA)

v20230727

APPLICATION CHECKLIST

Do NOT use this Application Checklist for a supplemented application. Instead use Application Checklist - Supplemented.

| | |
|-----------------------|---------------------------------|
| Plan name: | CWA/ITU Negotiated Pension Plan |
| EIN: | 13-6212879 |
| PN: | 001 |
| SFA Amount Requested: | \$526,467,008.00 |

-----Filers provide responses here for each Checklist Item:-----

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|------------------|-----------------------------------|---|------------------|---------------|---|--------------------------|--|---|---|
| 25. | Section D, Item (3) | Does the application identify the eligibility criteria in § 4262.3 that qualifies the plan as eligible to receive SFA, and include the requested information for each item that is applicable, as described in Section D, Item (3) of the SFA Filing Instructions? | Yes No | Yes | N/A - included as part of SFA App Plan Name | Page 4 | Plan has been certified in Critical and Declining status for 2020, 2021, and 2022. | N/A | N/A - included as part of SFA App Plan Name |
| 26.a. | Section D, Item (4) | If the plan's application is submitted on or before March 11, 2023, does the application identify the plan's priority group (see § 4262.10(d)(2))? Enter N/A if the plan's application is submitted after March 11, 2023. | Yes No N/A | N/A | N/A - included as part of SFA App Plan Name | | | N/A | N/A - included as part of SFA App Plan Name |
| 26.b. | | If the plan is submitting an emergency application under § 4262.10(f), is the application identified as an emergency application with the applicable emergency criteria identified? Enter N/A if the plan is not submitting an emergency application. | Yes No N/A | N/A | N/A - included as part of SFA App Plan Name | | | N/A | N/A - included as part of SFA App Plan Name |
| 27. | Section D, Item (5) | Does the application include a detailed narrative description of the development of the assumed future contributions and assumed future withdrawal liability payments used in the basic method (and in the increasing assets method for a MPRAs plan)? | Yes No | Yes | N/A - included as part of SFA App Plan Name | Pages 5-6 | | N/A | N/A - included as part of SFA App Plan Name |
| 28.a. | Section D, Item (6)a. | For plans eligible for SFA under § 4262.3(a)(1) or § 4262.3(a)(3), does the application identify which assumptions/methods (if any) used in showing the plan's eligibility for SFA differ from those used in the most recent certification of plan status completed before 1/1/2021? If there are any assumption/method changes, does the application include detailed explanations and supporting rationale and information as to why using the identified assumptions/methods is no longer reasonable and why the changed assumptions/methods are reasonable? Enter N/A if the plan is not eligible under § 4262.3(a)(1) or § 4262.3(a)(3). Enter N/A if there are no such assumption changes. | Yes No N/A | N/A | N/A - included as part of SFA App Plan Name | | The assumptions and methods used to determine the Plan's eligibility for SFA are the same as those used in the January 1, 2020 PPA Zone Certification. | N/A | N/A - included as part of SFA App Plan Name |

Application to PBGC for Approval of Special Financial Assistance (SFA)

v20230727

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| 28.b. | Section D, Item (6)b. | Does the application identify which assumptions/methods (if any) used to determine the requested SFA amount differ from those used in the most recent certification of plan status completed before 1/1/2021 (excluding the plan's non-SFA and SFA interest rates, which must be the same as the interest rates required by § 4262.4(e)(1) and (2))? If there are any assumption/method changes, does the application include detailed explanations and supporting rationale and information as to why using the identified original assumptions/methods is no longer reasonable and why the changed assumptions/methods are reasonable? Does the application state if the changed assumption is an extension of the CBU assumption or the administrative expenses assumption as described in Paragraph A "Adoption of assumptions not previously factored into pre-2021 certification of plan status" of Section III, Acceptable Assumption Changes of PBGC's SFA Assumptions? | Yes No | Yes | N/A - included as part of SFA App Plan Name | Page 7 Exhibit I Pages 8-19 Exhibit II Pages 20-22 | | N/A | N/A - included as part of SFA App Plan Name |
| 28.c. | Section D, Item (6) | If the mortality assumption uses a plan-specific mortality table or a plan-specific adjustment to a standard mortality table (regardless of if the mortality assumption is changed or unchanged from that used in the most recent certification of plan status completed before 1/1/2021), is supporting information provided that documents the methodology used and the rationale for selection of the methodology used to develop the plan-specific rates, as well as detailed information showing the determination of plan credibility and plan experience? Enter N/A if the mortality assumption does not use a plan-specific mortality table or a plan-specific adjustment to a standard mortality table for eligibility or for determining the SFA amount. | Yes No N/A | N/A | N/A - included as part of SFA App Plan Name | | | N/A | N/A - included as part of SFA App Plan Name |
| 29.a. | Section D, Item (7) | Does the application include, for an eligible plan that implemented a suspension of benefits under section 305(e)(9) or section 4245(a) of ERISA, a narrative description of how the plan will reinstate the benefits that were previously suspended and a proposed schedule of payments (equal to the amount of benefits previously suspended) to participants and beneficiaries? Enter N/A for a plan that has not implemented a suspension of benefits. | Yes No N/A | N/A | N/A - included as part of SFA App Plan Name | | | N/A | N/A - included as part of SFA App Plan Name |
| 29.b. | Section D, Item (7) | If Yes was entered for Checklist Item #29.a., does the proposed schedule show the yearly aggregate amount and timing of such payments, and is it prepared assuming the effective date for reinstatement is the day after the SFA measurement date? Enter N/A for a plan that entered N/A for Checklist Item #29.a. | Yes No N/A | N/A | N/A - included as part of SFA App Plan Name | | | N/A | N/A - included as part of SFA App Plan Name |

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| 29.c. | Section D, Item (7) | If the plan restored benefits under 26 CFR 1.432(e)(9)-1(e)(3) before the SFA measurement date, does the proposed schedule reflect the amount and timing of payments of restored benefits and the effect of the restoration on the benefits remaining to be reinstated? Enter N/A for a plan that did not restore benefits under 26 CFR 1.432(e)(9)-1(e)(3) before the SFA measurement date. Also enter N/A for a plan that entered N/A for Checklist Items #29.a. and #29.b. | Yes No N/A | N/A | N/A - included as part of SFA App Plan Name | | | N/A | N/A - included as part of SFA App Plan Name |
| 30.a. | Section E, Item (1) | Does the application include a fully completed Application Checklist, including the required information at the top of the Application Checklist (plan name, employer identification number (EIN), 3-digit plan number (PN), and SFA amount requested)? | Yes No | Yes | App Checklist NPP, Resubmit.xlsx | N/A | | Special Financial Assistance Checklist | App Checklist Plan Name |
| 30.b. | Section E, Item (1) - Addendum A | If the plan is required to provide information required by Addendum A of the SFA Filing Instructions (for "certain events"), are the additional Checklist Items #40.a. through #49.b. completed? Enter N/A if the plan is not required to submit the additional information described in Addendum A. | Yes No N/A | N/A | N/A | N/A | | Special Financial Assistance Checklist | N/A |
| 31. | Section E, Item (2) | If the plan claims SFA eligibility under § 4262.3(a)(1) of PBGC's SFA regulation based on a certification by the plan's enrolled actuary of plan status for SFA eligibility purposes completed on or after January 1, 2021, does the application include: (i) plan actuary's certification of plan status for SFA eligibility purposes for the specified year (and, if applicable, for each plan year after the plan year for which the pre-2021 zone certification was prepared and for the plan year immediately prior to the specified year)? (ii) for each certification in (i) above, does the application include all details and additional information described in Section B, Item (5) of the SFA Filing Instructions, including clear documentation of all assumptions, methods and census data used? (iii) for each certification in (i) above, does the application identify all assumptions and methods that are different from those used in the pre-2021 zone certification? Does the certification by the plan's enrolled actuary include clear indication of all assumptions and methods used including source of and date of participant data, measurement date, and a statement that the actuary is qualified to render the actuarial opinion? If the plan does not claim SFA eligibility under § 4262.3(a)(1) or claims SFA eligibility under § 4262.3(a)(1) using a zone certification completed before January 1, 2021, enter N/A. Is the information for this Checklist Item #31 contained in a single document and uploaded using the required filenaming convention? | Yes No N/A | N/A | | N/A | Plan is eligible for SFA under § 4262.3(a)(1) based on a certification of plan status completed before 1/1/2021 | Financial Assistance Application | SFA Elig Cert CD Plan Name |

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|------------------|-----------------------------------|--|------------------|---------------|---|--------------------------|---------------|---|---|
| 32.a. | Section E, Item (3) | <p>If the plan claims SFA eligibility under § 4262.3(a)(3) of PBGC's SFA regulation based on a certification by the plan's enrolled actuary of plan status for SFA eligibility purposes completed on or after January 1, 2021, does the application include:</p> <p>(i) plan actuary's certification of plan status for SFA eligibility purposes for the specified year (and, if applicable, for each plan year after the plan year for which the pre-2021 zone certification was prepared and for the plan year immediately prior to the specified year)?</p> <p>(ii) for each certification in (i) above, does the application include all details and additional information described in Section B, Item (5) of the SFA Filing Instructions, including clear documentation of all assumptions, methods and census data used?</p> <p>(iii) for each certification in (i) above, does the application identify all assumptions and methods that are different from those used in the pre-2021 zone certification?</p> <p>Does the certification by the plan's enrolled actuary include clear indication of all assumptions and methods used including source of and date of participant data, measurement date, and a statement that the actuary is qualified to render the actuarial opinion?</p> <p>If the plan does not claim SFA eligibility under § 4262.3(a)(3) or claims SFA eligibility under § 4262.3(a)(3) using a zone certification completed before January 1, 2021, enter N/A.</p> <p>Is the information for Checklist Items #32.a. and #32.b. contained in a single document and uploaded using the required filenaming convention?</p> | | N/A | | N/A | | Financial Assistance Application | SFA Elig Cert C Plan Name |
| 32.b. | Section E, Item (3) | <p>If the plan claims SFA eligibility under § 4262.3(a)(3) of PBGC's SFA regulation, does the application include a certification from the plan's enrolled actuary that the plan qualifies for SFA based on the applicable certification of plan status for SFA eligibility purposes for the specified year, and by meeting the other requirements of § 4262.3(c) of PBGC's SFA regulation. Does the provided certification include:</p> <p>(i) identification of the specified year for each component of eligibility (certification of plan status for SFA eligibility purposes, modified funding percentage, and participant ratio)</p> <p>(ii) derivation of the modified funded percentage</p> <p>(iii) derivation of the participant ratio</p> <p>Does the certification identify what test(s) under section 305(b)(2) of ERISA is met for the specified year listed above?</p> <p>Does the certification identify all assumptions and methods (including supporting rationale, and where applicable, reliance on the plan sponsor) used to develop the withdrawal liability receivable that is utilized in the calculation of the modified funded percentage?</p> <p>Enter N/A if the plan does not claim SFA eligibility under §4262.3(a)(3).</p> | Yes No N/A | N/A | N/A - included with SFA Elig Cert C Plan Name | N/A | | Financial Assistance Application | N/A - included in SFA Elig Cert C Plan Name |

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| 33. | Section E, Item (4) | If the plan's application is submitted on or prior to March 11, 2023, does the application include a certification from the plan's enrolled actuary that the plan is eligible for priority status, with specific identification of the applicable priority group? This item is not required (enter N/A) if the plan is insolvent, has implemented a MPRA suspension as of 3/11/2021, is in critical and declining status and had 350,000+ participants, or is listed on PBGC's website at www.pbgc.gov as being in priority group 6. See § 4262.10(d). Does the certification by the plan's enrolled actuary include clear indication of all assumptions and methods used including source of and date of participant data, measurement date, and a statement that the actuary is qualified to render the actuarial opinion? Is the filename uploaded using the required filenaming convention? | Yes No N/A | N/A | | N/A | | Financial Assistance Application | PG Cert Plan Name |
| 34.a. | | Does the application include the certification by the plan's enrolled actuary that the requested amount of SFA is the amount to which the plan is entitled under section 4262(j)(1) of ERISA and § 4262.4 of PBGC's SFA regulation? Does this certification include: (i) plan actuary's certification that identifies the requested amount of SFA and certifies that this is the amount to which the plan is entitled? (ii) clear indication of all assumptions and methods used including source of and date of participant data, measurement date, and a statement that the actuary is qualified to render the actuarial opinion? Is the information in Checklist #34.a. combined with #34.b. (if applicable) as a single document, and uploaded using the required filenaming convention? | Yes No | Yes | SFA Amount Cert NPP, Resubmit.pdf | N/A | | Financial Assistance Application | SFA Amount Cert Plan Name |
| 34.b. | Section E, Item (5) | If the plan is a MPRA plan, does the certification by the plan's enrolled actuary identify the amount of SFA determined under the basic method described in § 4262.4(a)(1) and the amount determined under the increasing assets method in § 4262.4(a)(2)(i)? If the amount of SFA determined under the "present value method" described in § 4262.4(a)(2)(ii) is not the greatest amount of SFA under § 4262.4(a)(2), does the certification state as such? If the amount of SFA determined under the "present value method" described in § 4262.4(a)(2)(ii) is the greatest amount of SFA under § 4262.4(a)(2), does the certification identify that amount? Enter N/A if the plan is not a MPRA plan. | Yes No N/A | N/A | N/A - included with SFA Amount Cert Plan Name | N/A | | N/A - included in SFA Amount Cert Plan Name | N/A - included in SFA Amount Cert Plan Name |

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| 35. | Section E, Item (6) | Does the application include the plan sponsor's identification of the amount of fair market value of assets at the SFA measurement date and certification that this amount is accurate? Does the application also include: (i) information that substantiates the asset value and how it was developed (e.g., trust or account statements, specific details of any adjustments)? (ii) a reconciliation of the fair market value of assets from the date of the most recent audited plan financial statements to the SFA measurement date (showing beginning and ending fair market value of assets for this period as well as the following items for the period: contributions, withdrawal liability payments, benefits paid, administrative expenses, and investment income)? With the exception of account statements and financial statements already provided as Checklist Items #8 and #9, is all information contained in a single document that is uploaded using the required filenaming convention? | Yes No | Yes | previously provided | N/A | See file "FMV Cert NPP.pdf" provided with our initial application (7/11/2023) | Financial Assistance Application | FMV Cert Plan Name |
| 36. | Section E, Item (7) | Does the application include a copy of the executed plan amendment required by § 4262.6(e)(1) of PBGC's SFA regulation which (i) is signed by authorized trustee(s) of the plan and (ii) includes the plan compliance language in Section E, Item (7) of the SFA Filing Instructions? | Yes No | Yes | previously provided | N/A | See file "Compliance Amend NPP.pdf" provided with our initial application (7/11/2023) | Pension plan documents, all versions available, and all amendments signed and dated | Compliance Amend Plan Name |
| 37. | Section E, Item (8) | In the case of a plan that suspended benefits under section 305(e)(9) or section 4245 of ERISA, does the application include: (i) a copy of the proposed plan amendment(s) required by § 4262.6(e)(2) to reinstate suspended benefits and pay make-up payments? (ii) a certification by the plan sponsor that the proposed plan amendment(s) will be timely adopted? Is the certification signed by either all members of the plan's board of trustees or by one or more trustees duly authorized to sign the certification on behalf of the entire board (including, if applicable, documentation that substantiates the authorization of the signing trustees)? Enter N/A if the plan has not suspended benefits. Is all information included in a single document that is uploaded using the required filenaming convention? | Yes No N/A | N/A | | N/A | | Pension plan documents, all versions available, and all amendments signed and dated | Reinstatement Amend Plan Name |
| 38. | Section E, Item (9) | In the case of a plan that was partitioned under section 4233 of ERISA, does the application include a copy of the executed plan amendment required by § 4262.9(c)(2)? Enter N/A if the plan was not partitioned. Is the document uploaded using the required filenaming convention? | Yes No N/A | N/A | | N/A | | Pension plan documents, all versions available, and all amendments signed and dated | Partition Amend Plan Name |

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Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

| Checklist Item # | SFA Filing Instructions Reference | | Response Options | Plan Response | Name of File(s) Uploaded | Page Number Reference(s) | Plan Comments | In the e-Filing Portal, upload as Document Type | Use this Filenaming Convention |
|--|--|--|------------------|---------------|---|--------------------------|--|--|---|
| 39. | Section E, Item (10) | Does the application include one or more copies of the penalties of perjury statement (see Section E, Item (10) of the SFA Filing Instructions) that (a) are signed by an authorized trustee who is a current member of the board of trustees, and (b) includes the trustee's printed name and title. Is all such information included in a single document and uploaded using the required filenaming convention? | Yes No | Yes | previously provided | N/A | Our understanding is the Trustee signature on the SFA Amendment Cover Letter satisfies this requirement for this resubmission. See file "Penalty NPP.pdf" provided with our initial application (7/11/2023) | Financial Assistance Application | Penalty Plan Name |
| Additional Information for Certain Events under § 4262.4(f) - Applicable to Any Events in § 4262.4(f)(2) through (f)(4) and Any Mergers in § 4262.4(f)(1)(ii) NOTE: If the plan is not required to provided information described in Addendum A of the SFA Filing Instructions, the Plan Response should be left blank for the remaining Checklist Items. | | | | | | | | | |
| 40.a. | Addendum A for Certain Events Section C, Item (4) | Does the application include an additional version of Checklist Item #16.a. (also including Checklist Items #16.c., #16.d., and #16.e.), that shows the determination of the SFA amount <u>using the basic method</u> described in § 4262.4(a)(1) as if any events had not occurred? See Template 4A. | Yes No | | | N/A | | Projections for special financial assistance (estimated income, benefit payments and expenses) | For additional submission due to any event: <i>Template 4A Plan Name CE</i> . For an additional submission due to a merger, <i>Template 4A Plan Name Merged</i> , where "Plan Name Merged" is an abbreviated version of the plan name for the separate plan involved in the merger. |
| 40.b.i. | Addendum A for Certain Events Section C, Item (4) | If the plan is a MPRA plan for which the requested amount of SFA is based on the <u>increasing assets method</u> described in § 4262.4(a)(2)(i), does the application also include an additional version of Checklist Item #16.b.i. that shows the determination of the SFA amount using the <u>increasing assets method</u> as if any events had not occurred? See Template 4A, sheet <i>4A-5 SFA Details .5(a)(2)(i)</i> . Enter N/A if the plan is not a MPRA Plan or if the plan is a MPRA plan for which the requested amount of SFA is based on the present value method. | Yes No N/A | | N/A - included as part of file in Checklist Item #40.a. | N/A | | N/A | N/A - included as part of file in Checklist Item #40.a. |
| 40.b.ii. | Addendum A for Certain Events Section C, Item (4) | If the plan is a MPRA plan for which the requested amount of SFA is based on the <u>increasing assets method</u> described in § 4262.4(a)(2)(i), does the application also include an additional version of Checklist Item #16.b.ii. that explicitly identifies the projected SFA exhaustion year based on the <u>increasing assets method</u> ? See Template 4A, <i>4A-5 SFA Details .4(a)(2)(i)</i> sheet and Addendum D. Enter N/A if the plan is not a MPRA Plan or if the plan is a MPRA plan for which the requested amount of SFA is based on the present value method. | Yes No N/A | | | N/A | | N/A | N/A - included as part of file in Checklist Item #40.a. |

Application to PBGC for Approval of Special Financial Assistance (SFA)

v20230727

APPLICATION CHECKLIST

| | |
|-----------------------|---------------------------------|
| Plan name: | CWA/ITU Negotiated Pension Plan |
| EIN: | 13-6212879 |
| PN: | 001 |
| SFA Amount Requested: | \$526,467,008.00 |

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 Plan Name = abbreviated plan name

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Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

| Checklist Item # | SFA Filing Instructions Reference | | Response Options | Plan Response | Name of File(s) Uploaded | Page Number Reference(s) | Plan Comments | In the e-Filing Portal, upload as Document Type | Use this Filenaming Convention |
|------------------|---|--|------------------|---------------|---|--------------------------|---|--|---|
| 40.b.iii. | Addendum A for Certain Events Section C, Item (4) | If the plan is a MPRA plan for which the requested amount of SFA is based on the <u>present value method</u> described in § 4262.4(a)(2)(ii), does the application also include an additional version of Checklist Item #16.b.iii. that shows the determination of the SFA amount using the <u>present value method</u> as if any events had not occurred? See Template 4B, sheet <i>4B-1 SFA Ben Pmts</i> , sheet <i>4B-2 SFA Details .4(a)(2)(ii)</i> , and sheet <i>4B-3 SFA Exhaustion</i> . Enter N/A if the plan is not a MPRA Plan or if the plan is a MPRA plan for which the requested amount of SFA is based on the increasing assets method. | Yes No N/A | | | N/A | | Projections for special financial assistance (estimated income, benefit payments and expenses) | For additional submission due to any event: <i>Template 4B Plan Name CE</i> . For an additional submission due to a merger, <i>Template 4B Plan Name Merged</i> , where "Plan Name Merged" is an abbreviated version of the plan name for the separate plan involved in the merger. |
| 41. | Addendum A for Certain Events Section C, Item (4) | For any merger, does the application show the SFA determination for this plan <u>and for each plan merged into this plan</u> (each of these determined as if they were still separate plans)? See Template 4A for a non-MPRA plan using the basic method, and for a MPRA plan using the increasing assets method. See Template 4B for a MPRA Plan using the present value method. Enter N/A if the plan has not experienced a merger. | Yes No N/A | | | N/A | | Projections for special financial assistance (estimated income, benefit payments and expenses) | For an additional submission due to a merger, <i>Template 4A (or Template 4B) Plan Name Merged</i> , where "Plan Name Merged" is an abbreviated version of the plan name for the separate plan involved in the merger. |
| 42.a. | Addendum A for Certain Events Section D | Does the application include a narrative description of any event and any merger, including relevant supporting documents which may include plan amendments, collective bargaining agreements, actuarial certifications related to a transfer or merger, or other relevant materials? | Yes No | | N/A - included as part of SFA App Plan Name | | For each Checklist Item #42.a. through #45.b., identify the relevant page number(s) within the single document. | Financial Assistance Application | <i>SFA App Plan Name</i> |
| 42.b. | Addendum A for Certain Events Section D | For a transfer or merger event, does the application include identifying information for all plans involved including plan name, EIN and plan number, and the date of the transfer or merger? | Yes No | | N/A - included as part of SFA App Plan Name | | | Financial Assistance Application | N/A - included as part of SFA App Plan Name |
| 43.a. | Addendum A for Certain Events Section D | Does the narrative description in the application identify the amount of SFA reflecting any event, the amount of SFA determined as if the event had not occurred, and confirmation that the requested SFA is no greater than the amount that would have been determined if the event had not occurred, unless the event is a contribution rate reduction and such event lessens the risk of loss to plan participants and beneficiaries? | Yes No | | N/A - included as part of SFA App Plan Name | | | Financial Assistance Application | N/A - included as part of SFA App Plan Name |
| 43.b. | Addendum A for Certain Events Section D | For a merger, is the determination of SFA as if the event had not occurred equal to the sum of the amount that would be determined for this plan and each plan merged into this plan (each as if they were still separate plans)? Enter N/A if the event described in Checklist Item #42.a. was not a merger. | Yes No N/A | | N/A - included as part of SFA App Plan Name | | | Financial Assistance Application | N/A - included as part of SFA App Plan Name |

Application to PBGC for Approval of Special Financial Assistance (SFA)

v20230727

APPLICATION CHECKLIST

| | |
|-----------------------|---------------------------------|
| Plan name: | CWA/ITU Negotiated Pension Plan |
| EIN: | 13-6212879 |
| PN: | 001 |
| SFA Amount Requested: | \$526,467,008.00 |

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Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

| Checklist Item # | SFA Filing Instructions Reference | | Response Options | Plan Response | Name of File(s) Uploaded | Page Number Reference(s) | Plan Comments | In the e-Filing Portal, upload as Document Type | Use this Filenaming Convention |
|------------------|--|---|------------------|---------------|---|--------------------------|---------------|---|---|
| 44.a. | Addendum A for Certain Events Section D | Does the application include an additional version of Checklist Item #25 that shows the determination of SFA eligibility as if any events had not occurred? | Yes No | | N/A - included as part of SFA App Plan Name | | | Financial Assistance Application | N/A - included as part of SFA App Plan Name |
| 44.b. | Addendum A for Certain Events Section D | For any merger, does this item include demonstrations of SFA eligibility for this plan and for each plan merged into this plan (each of these determined as if they were still separate plans)? Enter N/A if the event described in Checklist Item #42.a. was not a merger. | Yes No N/A | | N/A - included as part of SFA App Plan Name | | | Financial Assistance Application | N/A - included as part of SFA App Plan Name |
| 45.a. | Addendum A for Certain Events Section D | If the event is a contribution rate reduction and the amount of requested SFA is not limited to the amount of SFA determined as if the event had not occurred, does the application include a detailed demonstration that shows that the event lessens the risk of loss to plan participants and beneficiaries? Enter N/A if the event is not a contribution rate reduction, or if the event is a contribution rate reduction but the requested SFA is limited to the amount of SFA determined as if the event had not occurred. | Yes No N/A | | N/A - included as part of SFA App Plan Name | | | Financial Assistance Application | N/A - included as part of SFA App Plan Name |
| 45.b. | Addendum A for Certain Events Section D | Does the demonstration in Checklist Item #45.a. also identify all assumptions used, supporting rationale for the assumptions and other relevant information? Enter N/A if the plan entered N/A for Checklist Item #45.a. | Yes No N/A | | N/A - included as part of SFA App Plan Name | | | Financial Assistance Application | N/A - included as part of SFA App Plan Name |
| 46.a. | Addendum A for Certain Events Section E, Items (2) and (3) | Does the application include an additional certification from the plan's enrolled actuary with respect to the plan's SFA eligibility but with eligibility determined as if any events had not occurred? This should be in the format of Checklist Item #31 if the SFA eligibility is based on the plan status of critical and declining using a zone certification completed on or after January 1, 2021. This should be in the format of Checklist Items #32.a. and #32.b. if the SFA eligibility is based on the plan status of critical using a zone certification completed on or after January 1, 2021. If the above SFA eligibility is not based on § 4262.3(a)(1) or § 4262.3(a)(3) or is based on a zone certification completed prior to January 1, 2021, enter N/A. Is all relevant information contained in a single document and uploaded using the required filenaming convention? | Yes No N/A | | | N/A | | Financial Assistance Application | SFA Elig Cert Plan Name CE |

Application to PBGC for Approval of Special Financial Assistance (SFA)

v20230727

APPLICATION CHECKLIST

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| | |
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| Plan name: | CWA/ITU Negotiated Pension Plan |
| EIN: | 13-6212879 |
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Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

| Checklist Item # | SFA Filing Instructions Reference | | Response Options | Plan Response | Name of File(s) Uploaded | Page Number Reference(s) | Plan Comments | In the e-Filing Portal, upload as Document Type | Use this Filenaming Convention |
|------------------|--|---|------------------|---------------|--|--------------------------|---------------|---|--|
| 46.b. | Addendum A for Certain Events Section E, Items (2) and (3) | For any merger, does the application include additional certifications of the SFA eligibility for this plan and for each plan merged into this plan (each of these determined as if they were still separate plans)? If the above SFA eligibility is not based on § 4262.3(a)(1) or § 4262.3(a)(3) or is based on a zone certification completed prior to January 1, 2021, enter N/A. Enter N/A if the event described in Checklist Item #42.a. was not a merger. | Yes No N/A | | | N/A | | Financial Assistance Application | SFA Elig Cert Plan Name Merged CE "Plan Name Merged" is an abbreviated version of the plan name for the separate plan involved in the merger. |
| 47.a. | Addendum A for Certain Events Section E, Item (5) | Does the application include an additional certification from the plan's enrolled actuary with respect to the plan's SFA amount (in the format of Checklist Item #34.a.), but with the SFA amount determined as if any events had not occurred? | Yes No | | | N/A | | Financial Assistance Application | SFA Amount Cert Plan Name CE |
| 47.b. | Addendum A for Certain Events Section E, Item (5) | If the plan is a MPRA plan, does the certification in Checklist Item #46.a. identify the amount of SFA determined under the basic method described in § 4262.4(a)(1) and the amount determined under the increasing assets method in § 4262.4(a)(2)(i)? If the amount of SFA determined under the "present value method" described in § 4262.4(a)(2)(ii) is not the greatest amount of SFA under § 4262.4(a)(2), does the certification state as such? If the amount of SFA determined under the "present value method" described in § 4262.4(a)(2)(ii) is the greatest amount of SFA under § 4262.4(a)(2), does the certification identify that amount? Enter N/A if the plan is not a MPRA plan. | Yes No N/A | | N/A - included in SFA Amount Cert Plan Name CE | N/A | | N/A - included in SFA Amount Cert Plan Name | N/A - included in SFA Amount Cert Plan Name CE |
| 47.c. | Addendum A for Certain Events Section E, Item (5) | Does the certification in Checklist Items #47.a. and #47.b. (if applicable) clearly identify all assumptions and methods used, sources of participant data and census data, and other relevant information? | Yes No | | N/A - included in SFA Amount Cert Plan Name CE | N/A | | N/A - included in SFA Amount Cert Plan Name | N/A - included in SFA Amount Cert Plan Name CE |
| 48.a. | Addendum A for Certain Events Section E, Item (5) | For any merger, does the application include additional certifications of the SFA amount determined for this plan and for each plan merged into this plan (each of these determined as if they were still separate plans) ? Enter N/A if the event described in Checklist Item #42.a. was not a merger. | Yes No N/A | | | N/A | | Financial Assistance Application | SFA Amount Cert Plan Name Merged CE "Plan Name Merged" is an abbreviated version of the plan name for the separate plan involved in the merger. |

Application to PBGC for Approval of Special Financial Assistance (SFA)

v20230727

APPLICATION CHECKLIST

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Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

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|------------------|---|---|------------------|---------------|--|--------------------------|---------------|---|--|
| 48.b. | Addendum A for Certain Events Section E, Item (5) | For any merger, do the certifications clearly identify all assumptions and methods used, sources of participant data and census data, and other relevant information? Enter N/A if the event described in Checklist Item #42.a. was not a merger. | Yes No N/A | | N/A - included in SFA Amount Cert Plan Name CE | N/A | | N/A - included in SFA Amount Cert Plan Name CE | N/A - included in SFA Amount Cert Plan Name CE |
| 49.a. | Addendum A for Certain Events Section E | If the event is a contribution rate reduction and the amount of requested SFA is not limited to the amount of SFA determined as if the event had not occurred, does the application include a certification from the plan's enrolled actuary (or, if appropriate, from the plan sponsor) with respect to the demonstration to support a finding that the event lessens the risk of loss to plan participants and beneficiaries? Enter N/A if the event is not a contribution rate reduction, or if the event is a contribution rate reduction but the requested SFA is limited to the amount of SFA determined as if the event had not occurred. | Yes No N/A | | | N/A | | Financial Assistance Application | Cont Rate Cert Plan Name CE |
| 49.b. | Addendum A for Certain Events Section E | Does the demonstration in Checklist Item #48.a. also identify all assumptions used, supporting rationale for the assumptions and other relevant information? Enter N/A if the event is not a contribution rate reduction, or if the event is a contribution rate reduction but the requested SFA is limited to the amount of SFA determined as if the event had not occurred. | Yes No N/A | | N/A - included in Cont Rate Cert Plan Name CE | N/A | | N/A - included in Cont Rate Cert Plan Name CE | N/A - included in Cont Rate Cert Plan Name CE |

Additional Information for Certain Events under § 4262.4(f) - Applicable Only to Any Mergers in § 4262.4(f)(1)(ii)

Plans that have experienced mergers identified in § 4262.4(f)(1)(ii) must complete Checklist Items #50 through #63. If you are required to complete Checklist Items #50 through #63, your application will be considered incomplete if No is entered as a Plan Response for any of Checklist Items #50 through #63. All other plans should not provide any responses for Checklist Items #50 through #63.

| | | | | | | | | | |
|-----|---|---|-----------|--|--|-----|--|---|-----|
| 50. | Addendum A for Certain Events Section B, Item (1)a. | In addition to the information provided with Checklist Item #1, does the application also include similar plan documents and amendments for each plan that merged into this plan due to a merger described in § 4262.4(f)(1)(ii)? | Yes No | | | N/A | | Pension plan documents, all versions available, and all amendments signed and dated | N/A |
| 51. | Addendum A for Certain Events Section B, Item (1)b. | In addition to the information provided with Checklist Item #2, does the application also include similar trust agreements and amendments for each plan that merged into this plan due to a merger described in § 4262.4(f)(1)(ii)? | Yes No | | | N/A | | Pension plan documents, all versions available, and all amendments signed and dated | N/A |

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Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

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| 52. | Addendum A for Certain Events Section B, Item (1)c. | In addition to the information provided with Checklist Item #3, does the application also include the most recent IRS determination for each plan that merged into this plan due to a merger described in § 4262.4(f)(1)(ii)? Enter N/A if the plan does not have a determination letter. | Yes No N/A | | | N/A | | Pension plan documents, all versions available, and all amendments signed and dated | N/A |
| 53. | Addendum A for Certain Events Section B, Item (2) | In addition to the information provided with Checklist Item #4, for each plan that merged into this plan due to a merger described in § 4262.4(f)(1)(ii), does the application include the actuarial valuation report for the 2018 plan year and each subsequent actuarial valuation report completed before the application filing date? | Yes No | | | N/A | Identify here how many reports are provided. | Most recent actuarial valuation for the plan | YYYYAVR Plan Name Merged, where "Plan Name Merged" is abbreviated version of the plan name for the plan merged into this plan. |
| 54. | Addendum A for Certain Events Section B, Item (3) | In addition to the information provided with Checklist Items #5.a. and #5.b., does the application include similar rehabilitation plan information for each plan that merged into this plan due to a merger described in § 4262.4(f)(1)(ii)? | Yes No | | | N/A | | Rehabilitation plan (or funding improvement plan, if applicable) | N/A |
| 55. | Addendum A for Certain Events Section B, Item (4) | In addition to the information provided with Checklist Item #6, does the application include similar Form 5500 information for each plan that merged into this plan due to a merger described in § 4262.4(f)(1)(ii)? | Yes No | | | N/A | | Latest annual return/report of employee benefit plan (Form 5500) | YYYYForm5500 Plan Name Merged, "Plan Name Merged" is abbreviated version of the plan name for the plan merged into this plan. |
| 56. | Addendum A for Certain Events Section B, Item (5) | In addition to the information provided with Checklist Items #7.a., #7.b., and #7.c., does the application include similar certifications of plan status for each plan that merged into this plan due to a merger described in § 4262.4(f)(1)(ii)? | Yes No | | | N/A | Identify how many zone certifications are provided. | Zone certification | YYYYZoneYYYYMMDD Plan Name Merged, where the first "YYYY" is the applicable plan year, and "YYYYMMDD" is the date the certification was prepared. "Plan Name Merged" is an abbreviated version of the plan name for the plan merged into this plan. |
| 57. | Addendum A for Certain Events Section B, Item (6) | In addition to the information provided with Checklist Item #8, does the application include the most recent cash and investment account statements for each plan that merged into this plan due to a merger described in § 4262.4(f)(1)(ii)? | Yes No | | | N/A | | Bank/Asset statements for all cash and investment accounts | N/A |
| 58. | Addendum A for Certain Events Section B, Item (7) | In addition to the information provided with Checklist Item #9, does the application include the most recent plan financial statement (audited, or unaudited if audited is not available) for each plan that merged into this plan due to a merger described in § 4262.4(f)(1)(ii)? | Yes No | | | N/A | | Plan's most recent financial statement (audited, or unaudited if audited not available) | N/A |

Application to PBGC for Approval of Special Financial Assistance (SFA)

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| Plan name: | CWA/ITU Negotiated Pension Plan |
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 YYYY = plan year
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Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

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|------------------|---|--|------------------|---------------|--------------------------|--------------------------|---------------|---|---|
| 59. | Addendum A for Certain Events Section B, Item (8) | In addition to the information provided with Checklist Item #10, does the application include all of the written policies and procedures governing the plan's determination, assessment, collection, settlement, and payment of withdrawal liability for each plan that merged into this plan due to a merger described in § 4262.4(f)(1)(ii)? Are all such items included in a single document using the required filenaming convention? | Yes No | | | N/A | | Pension plan documents, all versions available, and all amendments signed and dated | <i>WDL Plan Name Merged</i> , where "Plan Name Merged" is an abbreviated version of the plan name for the plan merged into this plan. |
| 60. | Addendum A for Certain Events Section B, Item (9) | In addition to the information provided with Checklist Item #11, does the application include documentation of a death audit (with the information described in Checklist Item #11) for each plan that merged into this plan due to a merger described in § 4262.4(f)(1)(ii)? | Yes No | | | | | Pension plan documents, all versions available, and all amendments signed and dated | <i>Death Audit Plan Name Merged</i> , where "Plan Name Merged" is an abbreviated version of the plan name for the plan merged into this plan. |
| 61. | Addendum A for Certain Events Section C, Item (1) | In addition to the information provided with Checklist Item #13, does the application include the same information in the format of Template 1 for each plan that merged into this plan due to a merger described in § 4262.4(f)(1)(ii)? Enter N/A if each plan that fully merged into this plan is not required to respond Yes to line 8b(1) on the most recently filed Form 5500 Schedule MB. | Yes No N/A | | | | | Financial assistance spreadsheet (template) | <i>Template 1 Plan Name Merged</i> , where "Plan Name Merged" is an abbreviated version of the plan name for the plan merged into this plan. |
| 62. | Addendum A for Certain Events Section C, Item (2) | In addition to the information provided with Checklist Item #14, does the application include the same information in the format of Template 2 (if required based on the participant threshold) for each plan that merged into this plan due to a merger described in § 4262.4(f)(1)(ii)? Enter N/A if each plan that merged into this plan has less than 10,000 participants on line 6f of the most recently filed Form 5500. | Yes No N/A | | | | | Contributing employers | <i>Template 2 Plan Name Merged</i> , where "Plan Name Merged" is an abbreviated version of the plan name fore the plan merged into this plan. |
| 63. | Addendum A for Certain Events Section C, Item (3) | In addition to the information provided with Checklist Item #15, does the application include similar information in the format of Template 3 for each plan that merged into this plan due to a merger described in § 4262.4(f)(1)? | Yes No | | | | | Historical Plan Financial Information (CBUs, contribution rates, contribution amounts, withdrawal liability payments) | <i>Template 3 Plan Name Merged</i> , where "Plan Name Merged" is an abbreviated version of the plan name for the plan merged into this plan. |

TEMPLATE 4A

v20221102p

SFA Determination - under the "basic method" for all plans, and under the "increasing assets method" for MPRA plans

File name: *Template 4A Plan Name*, where "Plan Name" is an abbreviated version of the plan name.

If submitting additional information due to a merger under § 4262.4(f)(1)(ii): *Template 4A Plan Name Merged*, where "Plan Name Merged" is an abbreviated version of the plan name for the separate plan involved in the merger.

If submitting additional information due to certain events with limitations under § 4262.4(f)(1)(i): *Template 4A Plan Name Add*, where "Plan Name" is an abbreviated version of the plan name.

If submitting a supplemented application under § 4262.4(g)(6): *Template 4A Supp Plan Name*, where "Plan Name" is an abbreviated version of the plan name.

Instructions for Section C, Item (4) of the Instructions for Filing Requirements for Multiemployer Plans Applying for Special Financial Assistance:

IFR filers submitting a supplemented application should see Addendum C for more information.

MPRA plans using the "increasing assets method" should see Addendum D for more information.

For all plans, provide information used to determine the amount of SFA under the "basic method" described in § 4262.4(a)(1).

For MPRA plans, also provide information used to determine the amount of SFA under the "increasing assets method" described in § 4262.4(a)(2)(i).

The information to be provided is:

NOTE: All items below are provided on Sheet '4A-4 SFA Details .4(a)(1)' unless otherwise indicated.

- a. The amount of SFA calculated using the "basic method", determined as a lump sum as of the SFA measurement date.
- b. Non-SFA interest rate required under § 4262.4(e)(1) of PBGC's SFA regulation, including supporting details on how it was determined.
[Sheet: 4A-1 Interest Rates]
- c. SFA interest rate required under § 4262.4(e)(2) of PBGC's SFA regulation, including supporting details on how it was determined.
[Sheet: 4A-1 Interest Rates]
- d. Fair market value of assets as of the SFA measurement date. This amount should include any assets at the SFA measurement date attributable to financial assistance received by the plan under section 4261 of ERISA, but should not reflect a payable for amounts owed to PBGC for all amounts of such financial assistance received by the plan.

e. For each plan year in the period beginning on the SFA measurement date and ending on the last day of the last plan year ending in 2051 (the "SFA coverage period"):

- i. Separately identify the projected amount of contributions, projected withdrawal liability payments reflecting a reasonable allowance for amounts considered uncollectible, and other payments expected to be made to the plan (excluding the amount of financial assistance under section 4261 of ERISA and SFA to be received by the plan).
- ii. Identify the benefit payments described in § 4262.4(b)(1) (including any benefits that were restored under 26 CFR 1.432(e)(9)-(1)(e)(3) and excluding the payments in e.iii. below), separately for current retirees and beneficiaries, current terminated vested participants not yet in pay status, current active participants, and new entrants.

[Sheet: 4A-2 SFA Ben Pmts]

Identify total benefit payments paid and expected to be paid from projected SFA assets separately from total benefit payments paid and expected to be paid from non-SFA assets after the projected SFA assets are fully exhausted.

- iii. Separately identify the make-up payments described in § 4262.4(b)(1) attributable to the reinstatement of benefits under § 4262.15 that were previously suspended through the SFA measurement date.

[Also see applicable examples in Section C, Item (4)e.iii. of the SFA instructions.]

- iv. Separately identify administrative expenses paid and expected to be paid (excluding the amount owed PBGC under section 4261 of ERISA) for premiums to PBGC and for all other administrative expenses.

[Sheet: 4A-3 SFA Pcount and Admin Exp]

Identify total administrative expenses paid and expected to be paid from projected SFA assets separately from total administrative expenses paid and expected to be paid from non-SFA assets after the projected SFA assets are fully exhausted.

- v. Provide the projected total participant count at the beginning of each year.
[Sheet: 4A-3 SFA Pcount and Admin Exp]
- vi. Provide the projected investment income earned by assets not attributable to SFA based on the non-SFA interest rate in b. above and the projected fair market value of non-SFA assets at the end of each plan year.
- vii. Provide the projected investment income earned by assets attributable to SFA based on the SFA interest rate in c. above (excluding investment returns for the plan year in which the sum of annual projected benefit payments and administrative expenses for the year exceeds the beginning-of-year projected SFA assets) and the projected fair market value of SFA assets at the end of each plan year.

f. The projected SFA exhaustion year. This is the first day of the plan year in which the sum of annual projected benefit payments and administrative expenses for the year exceeds the beginning-of-year projected SFA assets. Note this date is only required for the calculation method under which the requested amount of SFA is determined.

Additional instructions for each individual worksheet:

Sheet

4A-1 SFA Determination - non-SFA Interest Rate and SFA Interest Rate

See instructions on 4A-1 Interest Rates.

4A-2 SFA Determination - Benefit Payments for the "basic method" for all plans, and for the "increasing assets method" for MRPA plans

This sheet is not required for an IFR filer submitting a supplemented application under § 4262.4(g)(6) if the total projected benefit payments are the same as those used in the application approved under the interim final rule.

On this sheet, you will provide:

- Basic plan information (plan name, EIN/PN, SFA measurement date), and
- Year-by-year deterministic projection of benefit payments.

For each plan year in the period beginning on the SFA measurement date and ending on the last day of the last plan year ending in 2051 (the "SFA coverage period"), identify benefit payments described in § 4262.4(b)(1) for current retirees and beneficiaries, current terminated vested participants not yet in pay status, currently active participants, and new entrants. Projected benefit payments should be entered based on current participant status as of the SFA census date. On this Sheet 4A-2, show all benefit payments as positive amounts.

If the plan has suspended benefit payments under sections 305(e)(9) or 4245(a) of ERISA, the benefit payments in this Sheet 4A-2 projection should reflect prospective reinstatement of benefits assuming such reinstatements commence as of the SFA measurement date. If the plan restored or partially restored benefits under 26 CFR 1.432(e)(9)-1(e)(3) before the SFA measurement date, the benefit payments in this Sheet 4A-2 should reflect fully restored prospective benefits.

Make-up payments to be paid to restore previously suspended benefits should not be included in this Sheet 4A-2, and are separately shown in Sheet 4A-4.

Except for the first row in the projection exhibit, each row must include the full plan year of the indicated information up to the plan year ending in 2051. The first row in the projection period is for the period beginning on the SFA measurement date and ending on the last day of the plan year containing the SFA measurement date, so the first row may contain less than a full plan year of information. For all other periods, provide the full plan year of information up to the plan year ending in 2051.

4A-3 SFA Determination - Participant Count and Administrative Expenses for the "basic method" for all plans, and for the "increasing assets method" for MPRA plans

This sheet is not required for an IFR filer submitting a supplemented application under § 4262.4(g)(6).

On this sheet, you will provide:

- Basic plan information (plan name, EIN/PN, SFA measurement date), and
- Year-by-year deterministic projection of participant count and administrative expenses.

For each plan year in the period beginning on the SFA measurement date and ending on the last day of the last plan year ending in 2051 (the "SFA coverage period"), identify the projected total participant count at the beginning of each year, as well as administrative expenses, separately for premiums to PBGC and for all other administrative expenses. On this Sheet 4A-3, show all administrative expenses as positive amounts. Total expenses should match the amounts shown on 4A-4 and 4A-5.

Any amounts owed to PBGC for financial assistance under section 4261 of ERISA should not be included in this Sheet 4A-3.

Except for the first row in the projection exhibit, each row must include the full plan year of the indicated information up to the plan year ending in 2051. The first row in the projection period is for the period beginning on the SFA measurement date and ending on the last day of the plan year containing the SFA measurement date, so the first row may contain less than a full plan year of information. For all other periods, provide the full plan year of information up to the plan year ending in 2051.

4A-4 SFA Determination - Details for the "basic method" under § 4262.4(a)(1) for all plans

On this sheet, you will provide:

- Basic plan information (plan name, EIN/PN, SFA measurement date, non-SFA interest rate, SFA interest rate),
- MPRA plan status and, if applicable, certain MPRA information,
- Fair Market Value of Assets as of the SFA measurement date,
- SFA Amount as of the SFA measurement date calculated under the "basic method",
- Projected SFA exhaustion year (only if the requested amount of SFA is determined under the "basic method"), and
- Year-by-year deterministic projection.

For each plan year in the period beginning on the SFA measurement date and ending on the last day of the last plan year ending in 2051 (the "SFA coverage period"), provide each of the items requested in Columns (1) through (12). Show payments INTO the plan as positive amounts and payments OUT of the plan as negative amounts.

If the plan has suspended benefit payments under sections 305(e)(9) or 4245(a) of ERISA, Column (5) should show the make-up payments to be paid to restore the previously suspended benefits. These amounts should be determined as if such make-up payments are paid beginning as of the SFA measurement date. If the plan sponsor elects to pay these amounts as a lump sum, then the lump sum amount is assumed paid as of the SFA measurement date. If the plan sponsor elects to pay equal installments over 60 months, the first monthly payment is assumed paid on the first regular payment date on or after the SFA measurement date. See the examples in the SFA Instructions. If the make-up payments are paid over 60 months, each row in the projection should reflect the monthly payments for that period. The prospective reinstatement of suspended benefits is included in Column (4); Column (5) is only for make-up payments for past benefits that were suspended.

Except for the first row in the projection exhibit, each row must include the full plan year of the indicated information up to the plan year ending in 2051. The first row in the projection period is for the period beginning on the SFA measurement date and ending on the last day of the plan year containing the SFA measurement date, so the first row may contain less than a full plan year of information. For all other periods, provide the full plan year of information up to the plan year ending in 2051.

4A-5 SFA Determination - Details for the "increasing assets method" under § 4262.4(a)(2)(i) for MPRA plans

This sheet is to only be used by MPRA plans. For such plans, this sheet should be completed in addition to Sheet 4A-4.

On this sheet, you will provide:

- Basic plan information (plan name, EIN/PN, SFA measurement date, non-SFA interest rate, SFA interest rate),
- MPRA plan status, and if applicable, certain MPRA information,
- Fair Market Value of Assets as of the SFA measurement date,
- SFA Amount as of the SFA measurement date calculated under the "increasing assets method",
- Projected SFA exhaustion year (only if the requested amount of SFA is determined under the "increasing assets method"), and
- Year-by-year deterministic projection.

This sheet is identical to Sheet 4A-4, and the information in Columns (1) through (6) should be the same as that used in the "basic method" calculation in Sheet 4A-4. The SFA Amount as of the SFA Measurement Date will differ from that calculated in Sheet 4A-4, as it will be calculated in accordance with § 4262.4(a)(2)(i) as the lowest whole dollar amount (not less than \$0) for which, as of the last day of each plan year during the SFA coverage period, projected SFA assets and projected non-SFA assets are both greater than or equal to zero, and, as of the last day of the SFA coverage period, the sum of projected SFA assets and projected non-SFA assets is greater than the amount of such sum as of the last day of the immediately preceding plan year.

Version Updates (newest version at top)

| Version | Date updated | |
|------------|--------------|--|
| v20221102p | 11/02/2022 | Added clarifying instructions for 4A-2 and 4A-3 |
| v20220802p | 08/02/2022 | Cosmetic changes to increase the size of some rows |
| v20220701p | 07/01/2022 | |

SFA Determination - non-SFA Interest Rate and SFA Interest Rate

Provide the non-SFA interest rate and SFA interest rate used, including supporting details on how they were determined.

PLAN INFORMATION

| | | |
|--|------------|--|
| Abbreviated Plan Name: | NPP | |
| EIN: | 13-6212879 | |
| PN: | 001 | |
| Initial Application Date: | 07/11/2023 | |
| SFA Measurement Date: | 12/31/2022 | For a plan other than a plan described in § 4262.4(g) (i.e., for a plan that has <u>not</u> filed an initial application under PBGC's interim final rule), the last day of the third calendar month immediately preceding the plan's initial application date. For a plan described in § 4262.4(g) (i.e., for a plan that filed an initial application prior to publication of the final rule), the last day of the calendar quarter immediately preceding the plan's initial application date. |
| Last day of first plan year ending after the measurement date: | 12/31/2023 | |

| | | |
|-----------------------------|-------|--|
| Non-SFA Interest Rate Used: | 5.85% | Rate used in projection of non-SFA assets. |
| SFA Interest Rate Used: | 3.77% | Rate used in projection of SFA assets. |

Development of non-SFA interest rate and SFA interest rate:

| | | |
|---------------------|-------|---|
| Plan Interest Rate: | 6.75% | Interest rate used for the funding standard account projections in the plan's most recently completed certification of plan status before 1/1/2021. |
|---------------------|-------|---|

Corresponding ERISA Section 303(h)(2)(C)(i), (ii), and (iii) rates disregarding modifications made under clause (iv) of such section.

| Month in which plan's initial application is filed, and corresponding segment rates (leave (i), (ii), and (iii) blank if the IRS Notice for this month has not yet been issued): | Month Year | (i) | (ii) | (iii) | 24-month average segment rates without regard to interest rate stabilization rules. These rates are issued by IRS each month. For example, the applicable segment rates for August 2021 are 1.13%, 2.70%, and 3.38%. Those rates were issued in IRS Notice 21-50 on August 16, 2021 (see page 2 of notice under the heading "24-Month Average Segment Rates Without 25-Year Average Adjustment"). They are also available on IRS' Funding Yield Curve Segment Rate Tables web page (See Funding Table 3 under the heading "24-Month Average Segment Rates Not Adjusted"). |
|--|---------------|-------|-------|-------|--|
| | | | | | |
| 1 month preceding month in which plan's initial application is filed, and corresponding segment rates: | February 2023 | 2.31% | 3.72% | 4.00% | |
| 2 months preceding month in which plan's initial application is filed, and corresponding segment rates: | January 2023 | 2.13% | 3.62% | 3.93% | |
| 3 months preceding month in which plan's initial application is filed, and corresponding segment rates: | December 2022 | 1.95% | 3.50% | 3.85% | |

| | | |
|--|-------|---|
| Non-SFA Interest Rate Limit (lowest 3rd segment rate plus 200 basis points): | 5.85% | This amount is calculated based on the other information entered above. |
|--|-------|---|

| | | |
|---|-------|---|
| Non-SFA Interest Rate Calculation (lesser of Plan Interest Rate and Non-SFA Interest Rate Limit): | 5.85% | This amount is calculated based on the other information entered above. |
| Non-SFA Interest Rate Match Check: | Match | If the non-SFA Interest Rate Calculation is not equal to the non-SFA Interest Rate Used, provide explanation below. |

| | | |
|---|-------|---|
| SFA Interest Rate Limit (lowest average of the 3 segment rates plus 67 basis points): | 3.77% | This amount is calculated based on the other information entered. |
|---|-------|---|

| | | |
|---|-------|---|
| SFA Interest Rate Calculation (lesser of Plan Interest Rate and SFA Interest Rate Limit): | 3.77% | This amount is calculated based on the other information entered above. |
| SFA Interest Rate Match Check: | Match | If the SFA Interest Rate Calculation is not equal to the SFA Interest Rate Used, provide explanation below. |

TEMPLATE 4A - Sheet 4A-2

v20221102p

SFA Determination - Benefit Payments for the "basic method" for all plans, and for the "increasing assets method" for MRPA plans

See Template 4A Instructions for Additional Instructions for Sheet 4A-2.

PLAN INFORMATION

| | |
|------------------------|------------|
| Abbreviated Plan Name: | NPP |
| EIN: | 13-6212879 |
| PN: | 001 |
| SFA Measurement Date: | 12/31/2022 |

On this Sheet, show all benefit payment amounts as positive amounts.

PROJECTED BENEFIT PAYMENTS for:

| SFA Measurement Date / Plan Year Start Date | Plan Year End Date | Current Retirees and Beneficiaries in Pay Status | Current Terminated Vested Participants | Current Active Participants | New Entrants | Total |
|---|--------------------|--|--|-----------------------------|--------------|--------------|
| | 12/31/2022 | | | | | |
| 01/01/2023 | 12/31/2023 | \$79,017,429 | \$7,152,654 | \$1,730,041 | \$0 | \$87,900,124 |
| 01/01/2024 | 12/31/2024 | \$75,846,465 | \$7,129,285 | \$2,412,622 | \$0 | \$85,388,372 |
| 01/01/2025 | 12/31/2025 | \$72,573,750 | \$9,152,179 | \$3,034,642 | \$0 | \$84,760,571 |
| 01/01/2026 | 12/31/2026 | \$69,213,693 | \$11,109,108 | \$3,511,555 | \$0 | \$83,834,356 |
| 01/01/2027 | 12/31/2027 | \$65,861,609 | \$13,010,117 | \$3,973,574 | \$0 | \$82,845,300 |
| 01/01/2028 | 12/31/2028 | \$62,467,617 | \$14,876,779 | \$4,354,010 | \$658 | \$81,699,064 |
| 01/01/2029 | 12/31/2029 | \$59,014,547 | \$16,625,073 | \$4,697,079 | \$1,547 | \$80,338,246 |
| 01/01/2030 | 12/31/2030 | \$55,545,531 | \$18,199,963 | \$5,007,554 | \$2,747 | \$78,755,795 |
| 01/01/2031 | 12/31/2031 | \$52,086,880 | \$19,549,263 | \$5,282,036 | \$6,463 | \$76,924,642 |
| 01/01/2032 | 12/31/2032 | \$48,692,527 | \$20,863,360 | \$5,520,068 | \$13,042 | \$75,088,997 |
| 01/01/2033 | 12/31/2033 | \$45,370,788 | \$21,835,524 | \$5,719,286 | \$20,601 | \$72,946,199 |
| 01/01/2034 | 12/31/2034 | \$42,103,465 | \$22,664,001 | \$5,936,154 | \$29,073 | \$70,732,693 |
| 01/01/2035 | 12/31/2035 | \$38,905,740 | \$23,239,463 | \$6,105,929 | \$40,815 | \$68,291,947 |
| 01/01/2036 | 12/31/2036 | \$35,792,179 | \$23,609,752 | \$6,248,140 | \$54,424 | \$65,704,495 |
| 01/01/2037 | 12/31/2037 | \$32,776,356 | \$23,846,904 | \$6,398,420 | \$73,550 | \$63,095,230 |
| 01/01/2038 | 12/31/2038 | \$29,870,763 | \$23,873,091 | \$6,498,870 | \$93,486 | \$60,336,210 |
| 01/01/2039 | 12/31/2039 | \$27,086,662 | \$23,894,517 | \$6,582,806 | \$112,390 | \$57,676,375 |
| 01/01/2040 | 12/31/2040 | \$24,434,113 | \$23,729,330 | \$6,653,168 | \$136,837 | \$54,953,448 |
| 01/01/2041 | 12/31/2041 | \$21,921,787 | \$23,423,497 | \$6,707,104 | \$168,136 | \$52,220,524 |
| 01/01/2042 | 12/31/2042 | \$19,556,693 | \$22,997,067 | \$6,733,763 | \$200,836 | \$49,488,359 |
| 01/01/2043 | 12/31/2043 | \$17,343,957 | \$22,501,132 | \$6,711,349 | \$237,712 | \$46,794,150 |
| 01/01/2044 | 12/31/2044 | \$15,286,750 | \$21,824,805 | \$6,675,023 | \$277,738 | \$44,064,316 |
| 01/01/2045 | 12/31/2045 | \$13,386,596 | \$21,138,952 | \$6,630,289 | \$320,252 | \$41,476,089 |
| 01/01/2046 | 12/31/2046 | \$11,643,532 | \$20,360,822 | \$6,538,903 | \$372,286 | \$38,915,543 |
| 01/01/2047 | 12/31/2047 | \$10,056,122 | \$19,496,293 | \$6,433,438 | \$431,632 | \$36,417,485 |
| 01/01/2048 | 12/31/2048 | \$8,621,436 | \$18,643,940 | \$6,319,666 | \$488,457 | \$34,073,499 |
| 01/01/2049 | 12/31/2049 | \$7,335,120 | \$17,723,665 | \$6,176,032 | \$548,789 | \$31,783,606 |
| 01/01/2050 | 12/31/2050 | \$6,191,483 | \$16,754,857 | \$6,015,204 | \$616,907 | \$29,578,451 |
| 01/01/2051 | 12/31/2051 | \$5,183,589 | \$15,773,049 | \$5,846,511 | \$685,897 | \$27,489,046 |

TEMPLATE 4A - Sheet 4A-3

v20221102p

SFA Determination - Participant Count and Administrative Expenses for the "basic method" for all plans, and for the "increasing assets method" for MPRA plans

See Template 4A Instructions for Additional Instructions for Sheet 4A-3.

PLAN INFORMATION

| | |
|------------------------|------------|
| Abbreviated Plan Name: | NPP |
| EIN: | 13-6212879 |
| PN: | 001 |
| SFA Measurement Date: | 12/31/2022 |

On this Sheet, show all administrative expense amounts as positive amounts

| SFA Measurement Date / Plan Year Start Date | | Plan Year End Date | Total Participant Count at Beginning of Plan Year | PROJECTED ADMINISTRATIVE EXPENSES for: | | |
|---|--|--------------------|---|--|-------------|-------------|
| | | | | PBGC Premiums | Other | Total |
| | | 12/31/2022 | N/A | | | |
| 01/01/2023 | | 12/31/2023 | 23,582.11 | \$825,374 | \$1,717,633 | \$2,543,007 |
| 01/01/2024 | | 12/31/2024 | 22,846.32 | \$819,612 | \$1,616,290 | \$2,435,902 |
| 01/01/2025 | | 12/31/2025 | 22,108.24 | \$812,962 | \$1,651,495 | \$2,464,457 |
| 01/01/2026 | | 12/31/2026 | 21,355.64 | \$804,919 | \$1,687,346 | \$2,492,265 |
| 01/01/2027 | | 12/31/2027 | 20,610.28 | \$796,246 | \$1,724,011 | \$2,520,257 |
| 01/01/2028 | | 12/31/2028 | 19,855.64 | \$786,269 | \$1,761,385 | \$2,547,654 |
| 01/01/2029 | | 12/31/2029 | 19,106.86 | \$775,534 | \$1,799,594 | \$2,575,128 |
| 01/01/2030 | | 12/31/2030 | 18,356.40 | \$763,700 | \$1,838,600 | \$2,602,300 |
| 01/01/2031 | | 12/31/2031 | 17,614.82 | \$915,970 | \$1,878,505 | \$2,794,475 |
| 01/01/2032 | | 12/31/2032 | 16,932.29 | \$902,491 | \$1,919,750 | \$2,822,241 |
| 01/01/2033 | | 12/31/2033 | 16,264.16 | \$888,552 | \$1,962,007 | \$2,850,559 |
| 01/01/2034 | | 12/31/2034 | 15,602.23 | \$873,699 | \$2,005,232 | \$2,878,931 |
| 01/01/2035 | | 12/31/2035 | 14,950.48 | \$858,131 | \$2,049,483 | \$2,907,614 |
| 01/01/2036 | | 12/31/2036 | 14,311.04 | \$841,965 | \$2,094,808 | \$2,936,773 |
| 01/01/2037 | | 12/31/2037 | 13,686.41 | \$825,346 | \$2,141,258 | \$2,966,604 |
| 01/01/2038 | | 12/31/2038 | 13,072.94 | \$808,060 | \$2,188,830 | \$2,996,890 |
| 01/01/2039 | | 12/31/2039 | 12,474.68 | \$790,358 | \$2,237,593 | \$3,027,951 |
| 01/01/2040 | | 12/31/2040 | 11,891.22 | \$772,226 | \$2,287,578 | \$3,059,804 |
| 01/01/2041 | | 12/31/2041 | 11,334.70 | \$754,488 | \$2,338,945 | \$3,093,433 |
| 01/01/2042 | | 12/31/2042 | 10,792.28 | \$736,341 | \$2,391,602 | \$3,127,943 |
| 01/01/2043 | | 12/31/2043 | 10,265.09 | \$717,881 | \$2,445,598 | \$3,163,479 |
| 01/01/2044 | | 12/31/2044 | 9,751.32 | \$698,999 | \$2,500,949 | \$3,199,948 |
| 01/01/2045 | | 12/31/2045 | 9,254.80 | \$679,993 | \$2,557,740 | \$3,237,733 |
| 01/01/2046 | | 12/31/2046 | 8,778.67 | \$661,135 | \$2,616,047 | \$3,277,182 |
| 01/01/2047 | | 12/31/2047 | 8,319.05 | \$642,183 | \$2,635,391 | \$3,277,574 |
| 01/01/2048 | | 12/31/2048 | 7,875.74 | \$623,161 | \$2,443,454 | \$3,066,615 |
| 01/01/2049 | | 12/31/2049 | 7,449.61 | \$604,180 | \$2,256,345 | \$2,860,525 |
| 01/01/2050 | | 12/31/2050 | 7,040.63 | \$585,286 | \$2,076,775 | \$2,662,061 |
| 01/01/2051 | | 12/31/2051 | 6,644.18 | \$566,137 | \$1,907,877 | \$2,474,014 |

TEMPLATE 4A - Sheet 4A-4

SFA Determination - Details for the "basic method" under § 4262.4(a)(1) for all plans

See Template 4A Instructions for Additional Instructions for Sheet 4A-4.

PLAN INFORMATION

| | |
|--|---------------|
| Abbreviated Plan Name: | NPP |
| EIN: | 13-6212879 |
| PN: | 001 |
| MPRA Plan? | No |
| If a MPRA Plan, which method yields the greatest amount of SFA? | N/A |
| SFA Measurement Date: | 12/31/2022 |
| Fair Market Value of Assets as of the SFA Measurement Date: | \$445,144,385 |
| SFA Amount as of the SFA Measurement Date under the method calculated in this Sheet: | \$526,467,008 |
| Projected SFA exhaustion year: | 01/01/2029 |
| Non-SFA Interest Rate: | 5.85% |
| SFA Interest Rate: | 3.77% |

Meets the definition of a MPRA plan described in § 4262.4(a)(3)?

MPRA increasing assets method described in § 4262.4(a)(2)(i).
MPRA present value method described in § 4262.4(a)(2)(ii).

Per § 4262.4(a)(1), the lowest whole dollar amount (not less than \$0) for which, as of the last day of each plan year during the SFA coverage period, projected SFA assets and projected non-SFA assets are both greater than or equal to zero.

Only required on this sheet if the requested amount of SFA is based on the "basic method".
Plan Year Start Date of the plan year in which the sum of annual projected benefit payments and administrative expenses for the year exceeds the beginning-of-year projected SFA assets.

On this Sheet, show payments INTO the plan as positive amounts, and payments OUT of the plan as negative amounts.

| SFA Measurement Date / Plan Year Start Date | Plan Year End Date | (1) Contributions | (2) Withdrawal Liability Payments | (3) Other Payments to Plan (excluding financial assistance and SFA) | (4) Benefit Payments (should match total from Sheet 4A-2) | (5) Make-up Payments Attributable to Reinstatement of Benefits Suspended through the SFA Measurement Date | (6) Administrative Expenses (excluding amount owed PBGC under 4261 of ERISA; should match total from Sheet 4A-3) | (7) Benefit Payments (from (4) and (5)) and Administrative Expenses (from (6)) Paid from SFA Assets | (8) SFA Investment Income Based on SFA Interest Rate | (9) Projected SFA Assets at End of Plan Year (prior year assets + (7) + (8)) | (10) Benefit Payments (from (4) and (5)) and Administrative Expenses (from (6)) Paid from Non-SFA Assets | (11) Non-SFA Investment Income Based on Non-SFA Interest Rate | (12) Projected Non-SFA Assets at End of Plan Year (prior year assets + (1) + (2) + (3) + (10) + (11)) |
|---|--------------------|----------------------|--------------------------------------|--|--|--|---|--|---|---|---|--|--|
| 01/01/2023 | 12/31/2022 | | | | | | | | | \$526,467,008 | | | \$445,144,385 |
| 01/01/2023 | 12/31/2023 | \$3,387,268 | \$11,768,897 | | -\$87,900,124 | | -\$2,543,007 | -\$90,443,131 | \$18,158,725 | \$454,182,602 | \$0 | \$26,477,964 | \$486,778,514 |
| 01/01/2024 | 12/31/2024 | \$3,184,039 | \$11,833,056 | | -\$85,388,372 | -\$40,138,014 | -\$2,435,902 | -\$127,962,288 | \$13,969,309 | \$340,189,623 | \$0 | \$28,909,550 | \$530,705,159 |
| 01/01/2025 | 12/31/2025 | \$2,993,006 | \$11,886,860 | | -\$84,760,571 | | -\$2,464,457 | -\$87,225,028 | \$11,196,168 | \$264,160,763 | \$0 | \$31,475,302 | \$577,060,327 |
| 01/01/2026 | 12/31/2026 | \$2,813,430 | \$9,454,550 | | -\$83,834,356 | | -\$2,492,265 | -\$86,326,621 | \$8,346,658 | \$186,180,800 | \$0 | \$34,111,768 | \$623,440,075 |
| 01/01/2027 | 12/31/2027 | \$2,644,624 | \$9,150,323 | | -\$82,845,300 | | -\$2,520,257 | -\$85,365,557 | \$5,424,762 | \$106,240,005 | \$0 | \$36,811,343 | \$672,046,365 |
| 01/01/2028 | 12/31/2028 | \$2,485,957 | \$8,886,504 | | -\$81,699,064 | | -\$2,547,654 | -\$84,246,718 | \$2,431,889 | \$24,425,176 | \$0 | \$39,642,629 | \$723,061,455 |
| 01/01/2029 | 12/31/2029 | \$2,336,796 | \$8,616,392 | | -\$80,338,246 | | -\$2,575,128 | -\$24,425,176 | \$0 | \$0 | -\$58,488,198 | \$40,928,457 | \$716,454,902 |
| 01/01/2030 | 12/31/2030 | \$2,196,595 | \$8,282,164 | | -\$78,755,795 | | -\$2,602,300 | \$0 | \$0 | \$0 | -\$81,358,095 | \$39,868,856 | \$685,444,422 |
| 01/01/2031 | 12/31/2031 | \$2,064,795 | \$4,814,244 | | -\$76,924,642 | | -\$2,794,475 | \$0 | \$0 | \$0 | -\$79,719,117 | \$37,998,207 | \$650,602,551 |
| 01/01/2032 | 12/31/2032 | \$2,044,154 | \$4,676,900 | | -\$75,088,997 | | -\$2,822,241 | \$0 | \$0 | \$0 | -\$77,911,238 | \$36,007,531 | \$615,419,898 |
| 01/01/2033 | 12/31/2033 | \$2,023,706 | \$4,470,744 | | -\$72,946,199 | | -\$2,850,559 | \$0 | \$0 | \$0 | -\$75,796,758 | \$34,003,781 | \$580,121,371 |
| 01/01/2034 | 12/31/2034 | \$2,003,472 | \$4,041,568 | | -\$70,732,693 | | -\$2,878,931 | \$0 | \$0 | \$0 | -\$73,611,624 | \$31,988,866 | \$544,543,653 |
| 01/01/2035 | 12/31/2035 | \$1,983,431 | \$3,788,339 | | -\$68,291,947 | | -\$2,907,614 | \$0 | \$0 | \$0 | -\$71,199,561 | \$29,969,240 | \$509,085,102 |
| 01/01/2036 | 12/31/2036 | \$1,963,604 | \$3,764,155 | | -\$65,704,495 | | -\$2,936,773 | \$0 | \$0 | \$0 | -\$68,641,268 | \$27,967,412 | \$474,139,005 |
| 01/01/2037 | 12/31/2037 | \$1,943,970 | \$3,767,690 | | -\$63,095,230 | | -\$2,966,604 | \$0 | \$0 | \$0 | -\$66,061,834 | \$25,996,977 | \$439,785,808 |
| 01/01/2038 | 12/31/2038 | \$1,924,530 | \$3,513,697 | | -\$60,336,210 | | -\$2,996,890 | \$0 | \$0 | \$0 | -\$63,333,100 | \$24,058,112 | \$405,949,047 |
| 01/01/2039 | 12/31/2039 | \$1,905,292 | \$3,168,556 | | -\$57,676,375 | | -\$3,027,951 | \$0 | \$0 | \$0 | -\$60,704,326 | \$22,143,954 | \$372,462,523 |
| 01/01/2040 | 12/31/2040 | \$1,886,237 | \$2,589,371 | | -\$54,953,448 | | -\$3,059,804 | \$0 | \$0 | \$0 | -\$58,013,252 | \$20,245,338 | \$339,170,217 |
| 01/01/2041 | 12/31/2041 | \$1,867,375 | \$1,523,955 | | -\$52,220,524 | | -\$3,093,433 | \$0 | \$0 | \$0 | -\$55,313,957 | \$18,344,306 | \$305,591,896 |
| 01/01/2042 | 12/31/2042 | \$1,848,695 | \$788,527 | | -\$49,488,359 | | -\$3,127,943 | \$0 | \$0 | \$0 | -\$52,616,302 | \$16,436,015 | \$272,048,831 |
| 01/01/2043 | 12/31/2043 | \$1,830,208 | \$467,349 | | -\$46,794,150 | | -\$3,163,479 | \$0 | \$0 | \$0 | -\$49,957,629 | \$14,540,612 | \$238,929,371 |
| 01/01/2044 | 12/31/2044 | \$1,811,914 | \$443,504 | | -\$44,064,316 | | -\$3,199,948 | \$0 | \$0 | \$0 | -\$47,264,264 | \$12,679,570 | \$206,600,095 |
| 01/01/2045 | 12/31/2045 | \$1,793,802 | \$392,945 | | -\$41,476,089 | | -\$3,237,733 | \$0 | \$0 | \$0 | -\$44,713,822 | \$10,859,867 | \$174,932,887 |
| 01/01/2046 | 12/31/2046 | \$1,775,872 | \$343,460 | | -\$38,915,543 | | -\$3,277,182 | \$0 | \$0 | \$0 | -\$42,192,725 | \$9,078,086 | \$143,937,580 |
| 01/01/2047 | 12/31/2047 | \$1,758,114 | \$295,152 | | -\$36,417,485 | | -\$3,277,574 | \$0 | \$0 | \$0 | -\$39,695,059 | \$7,334,974 | \$113,630,761 |
| 01/01/2048 | 12/31/2048 | \$1,740,538 | \$248,265 | | -\$34,073,499 | | -\$3,066,615 | \$0 | \$0 | \$0 | -\$37,140,114 | \$5,633,836 | \$84,113,286 |
| 01/01/2049 | 12/31/2049 | \$1,723,133 | \$203,093 | | -\$31,783,606 | | -\$2,860,525 | \$0 | \$0 | \$0 | -\$34,644,131 | \$3,977,230 | \$55,372,611 |
| 01/01/2050 | 12/31/2050 | \$1,705,900 | \$160,952 | | -\$29,578,451 | | -\$2,662,061 | \$0 | \$0 | \$0 | -\$32,240,512 | \$2,363,495 | \$27,362,446 |
| 01/01/2051 | 12/31/2051 | \$1,688,849 | \$122,790 | | -\$27,489,046 | | -\$2,474,014 | \$0 | \$0 | \$0 | -\$29,963,060 | \$788,977 | \$2 |

TEMPLATE 6A

v20220802p

Reconciliation - for non-MPRA plans using the "basic method", or for MPRA plans for which the requested amount of SFA is determined under the "increasing assets method"

File name: *Template 6A Plan Name*, where "Plan Name" is an abbreviated version of the plan name.

Instructions for Section C, Item (6) of the Instructions for Filing Requirements for Multiemployer Plans Applying for Special Financial Assistance:

This Template 6A is not required if all assumptions and methods used to determine the requested SFA amount are identical to those used in the most recent actuarial certification of plan status completed before 1/1/2021 ("pre-2021 certification of plan status"), except the non-SFA and SFA interest rates, and except any assumptions changed in accordance with Section III, Acceptable Assumption Changes, in PBGC's SFA assumptions guidance (other than the acceptable assumption change for "missing" terminated vested participants described in Section III.E of PBGC's SFA assumptions guidance).

This Template 6A is also not required if the requested SFA amount from Template 4A is the same as the SFA amount shown in Template 5A (Baseline).

If the assumptions/methods used to determine the requested SFA amount differ from those in the "Baseline" projection in Template 5A, then provide a reconciliation of the change in the total amount of SFA due to each change in assumption/method from the Baseline to the requested SFA as shown in Template 4A.

For each assumption/method change from the Baseline through the requested SFA amount, provide a deterministic projection using the same calculation methodology used to determine the requested SFA amount, in the same format as Template 4A (either Sheet 4A-4 or Sheet 4A-5).

Additional instructions for each individual worksheet:

Sheet

6A-1 Reconciliation - Summary for the "basic method", or for MPRA plans for which the requested amount of SFA is determined under the "increasing assets method"

For Item number 1, show the SFA amount determined in Template 5A using the "Baseline" assumptions and methods. If there is only one change in assumptions/methods between the Baseline (Template 5A) and the requested SFA amount (Template 4A), then show on Item number 2 the requested SFA amount, and briefly identify the change in assumptions from the Baseline.

If there is more than one change in assumptions/methods from the Baseline, show each individual change as a separate Item number. Each Item number should reflect all changes already measured in the prior Item number. For example, the difference between the SFA amount shown for Item number 4 and Item number 5 should be the incremental change due to changing the identified single assumption/method. The Item numbers should show assumption/method changes in the order that they were incrementally measured.

6A-2 Reconciliation - Details for the "basic method" under § 4262.4(a)(1) for non-MPRA plans, or for the "increasing assets method" under § 4262.4(a)(2)(i) for MPRA plans for which the requested amount of SFA is determined under that method

For non-MPRA plans, see Template 4A instructions for Sheet 4A-4, except provide the projection used to determine the intermediate Item number 2 SFA amount from Sheet 6A-1 under the "basic method" described in § 4262.4(a)(1). Unlike Sheet 4A-4, it is not necessary to explicitly identify the projected SFA exhaustion year in Sheet 6A-2.

For MPRA plans for which the requested amount of SFA is determined under the "increasing assets method", see Template 4A instructions for Sheet 4A-5, except provide the projection used to determine each intermediate SFA amount from Sheet 6A-1 under the "increasing assets method" described in § 4262.4(a)(2)(i). Unlike Sheet 4A-5, it is not necessary to explicitly identify the projected SFA exhaustion year in Sheet 6A-2.

A Reconciliation Details sheet is not needed for the last Item number shown in the Sheet 6A-1 Reconciliation, since the information should be the same as shown in Template 4A. For example, if there is only one assumption change from the Baseline, then Item number 2 should identify what assumption changed between the Baseline and Item number 2, where Item number 2 is the requested SFA amount. Since details on the determination of the requested SFA amount are shown in Template 4A, a separate Sheet 6A-2 Reconciliation Details is not required here.

6A-3 Reconciliation - Details for the "basic method" under § 4262.4(a)(1) for non-MPRA plans, or for the "increasing assets method" under § 4262.4(a)(2)(i) for MPRA plans for which the requested amount of SFA is determined under that method

See instructions for 6A-2 Reconciliation Details, except for the intermediate Item number 3 SFA amount from Sheet 6A-1.

6A-4 Reconciliation - Details for the "basic method" under § 4262.4(a)(1) for non-MPRA plans, or for the "increasing assets method" under § 4262.4(a)(2)(i) for MPRA plans for which the requested amount of SFA is determined under that method

See instructions for 6A-2 Reconciliation Details, except for the intermediate Item number 4 SFA amount from Sheet 6A-1.

6A-5 Reconciliation - Details for the "basic method" under § 4262.4(a)(1) for non-MPRA plans, or for the "increasing assets method" under § 4262.4(a)(2)(i) for MPRA plans for which the requested amount of SFA is determined under that method

See instructions for 6A-2 Reconciliation Details, except for the intermediate Item number 5 SFA amount from Sheet 6A-1.

Version Updates (newest version at top)

| Version | Date updated | |
|------------|--------------|--|
| v20220802p | 08/02/2022 | Cosmetic changes to increase the size of some rows |
| v20220701p | 07/01/2022 | |

TEMPLATE 6A - Sheet 6A-1

v20220802p

Reconciliation - Summary for the "basic method", or for MPRA plans for which the requested amount of SFA is determined under the "increasing assets method"

See Template 6A Instructions for Additional Instructions for Sheet 6A-1.

PLAN INFORMATION

| | |
|---|------------|
| Abbreviated Plan Name: | NPP |
| EIN: | 13-6212879 |
| PN: | 001 |
| MPRA Plan? | No |
| If a MPRA Plan, which method yields the greatest amount of SFA? | N/A |

| Item number | Basis for Assumptions/Methods. For each Item, briefly describe the incremental change reflected in the SFA amount. | Change in SFA Amount (from prior Item number) | SFA Amount | |
|-------------|--|---|---------------|--|
| 1 | Baseline | N/A | \$498,797,172 | NOTE: A sheet with Recon Details is not required for the last Item number provided, since that information should be the same as provided in Template 4A. From Template 5A. |
| 2 | Fully value TVs younger than 85 | \$7,020,803 | \$505,817,975 | Show details supporting the SFA amount on Sheet 6A-2. |
| 3 | Update Late Retirement Adjustment Factor for TVs Added Back | \$1,271,586 | \$507,089,561 | Show details supporting the SFA amount on Sheet 6A-3. |
| 4 | Update Administrative Expenses | \$1,155,706 | \$508,245,267 | Show details supporting the SFA amount on Sheet 6A-4. |
| 5 | Withdrawal Liability Collectability | \$17,260,775 | \$525,506,042 | Show details supporting the SFA amount on Sheet 6A-5. |
| 6 | Update CBU Declines | \$1,050,277 | \$526,556,319 | Show details supporting the SFA amount on Sheet 6A-6. |
| 7 | Removed six "missing" terminated vested participants who died prior to the SFA measurement date who were inadvertently included in the Plan's SFA calculation. | (\$89,311) | \$526,467,008 | From Template 4A. |

Create additional rows as needed, and create additional detailed sheets by copying Sheet 6A-5 and re-labeling the header and the sheet name to be 6A-6, 6A-7, etc.

TEMPLATE 6A - Sheet 6A-2

| | |
|-------------------------------|---------------------------------|
| Item Description (from 6A-1): | Fully value TVs younger than 85 |
|-------------------------------|---------------------------------|

Reconciliation - Details for the "basic method" under § 4262.4(a)(1) for non-MPRA plans, or for the "increasing assets method" under § 4262.4(a)(2)(i) for MPRA plans for which the requested amount of SFA is determined under that method

See Template 4A instructions for Sheet 4A-4 or Sheet 4A-5, except provide the projection used to determine the intermediate SFA amount.

PLAN INFORMATION

| | |
|--|---------------|
| Abbreviated Plan Name: | NPP |
| EIN: | 13-6212879 |
| PN: | 001 |
| MPRA Plan? | No |
| If a MPRA Plan, which method yields the greatest amount of SFA? | N/A |
| SFA Measurement Date: | 12/31/2022 |
| Fair Market Value of Assets as of the SFA Measurement Date: | \$445,144,385 |
| SFA Amount as of the SFA Measurement Date under the method calculated in this Sheet: | \$505,817,975 |
| Non-SFA Interest Rate: | 5.85% |
| SFA Interest Rate: | 3.77% |

On this Sheet, show payments INTO the plan as positive amounts, and payments OUT of the plan as negative amounts.

| SFA Measurement Date / Plan Year Start Date | Plan Year End Date | (1) Contributions | (2) Withdrawal Liability Payments | (3) Other Payments to Plan (excluding financial assistance and SFA) | (4) Benefit Payments | (5) Make-up Payments Attributable to Reinstatement of Benefits Suspended through the SFA Measurement Date | (6) Administrative Expenses (excluding amount owed PBGC under 4261 of ERISA) | (7) Benefit Payments (from (4) and (5)) and Administrative Expenses (from (6)) Paid from SFA Assets | (8) SFA Investment Income Based on SFA Interest Rate | (9) Projected SFA Assets at End of Plan Year (prior year assets + (7) + (8)) | (10) Benefit Payments (from (4) and (5)) and Administrative Expenses (from (6)) Paid from Non-SFA Assets | (11) Non-SFA Investment Income Based on Non-SFA Interest Rate | (12) Projected Non-SFA Assets at End of Plan Year (prior year assets + (1) + (2) + (3) + (10) + (11)) |
|---|--------------------|----------------------|--------------------------------------|--|-------------------------|--|---|--|---|---|---|--|--|
| | 12/31/2022 | | | | | | | | | \$505,817,975 | | | \$445,144,385 |
| 01/01/2023 | 12/31/2023 | \$3,387,268 | \$14,529,502 | | -\$85,888,632 | | -\$2,535,284 | -\$88,423,916 | \$17,417,967 | \$434,812,026 | \$0 | \$26,557,564 | \$489,618,719 |
| 01/01/2024 | 12/31/2024 | \$3,184,039 | \$14,575,226 | | -\$85,482,831 | -\$40,138,014 | -\$2,416,158 | -\$128,037,003 | \$13,237,643 | \$320,012,666 | \$0 | \$29,154,771 | \$536,532,755 |
| 01/01/2025 | 12/31/2025 | \$2,993,006 | \$14,575,226 | | -\$84,851,086 | | -\$2,432,470 | -\$87,283,556 | \$10,434,404 | \$243,163,514 | \$0 | \$31,893,734 | \$585,994,721 |
| 01/01/2026 | 12/31/2026 | \$2,813,430 | \$11,507,315 | | -\$83,920,754 | | -\$2,447,824 | -\$86,368,578 | \$7,554,279 | \$164,349,215 | \$0 | \$34,693,620 | \$635,009,086 |
| 01/01/2027 | 12/31/2027 | \$2,644,624 | \$11,068,158 | | -\$82,928,631 | | -\$2,463,157 | -\$85,391,788 | \$4,601,222 | \$83,558,649 | \$0 | \$37,543,430 | \$686,265,298 |
| 01/01/2028 | 12/31/2028 | \$2,485,957 | \$10,680,683 | | -\$81,779,862 | | -\$2,477,795 | -\$83,558,649 | \$0 | \$0 | -\$699,008 | \$40,506,015 | \$739,238,945 |
| 01/01/2029 | 12/31/2029 | \$2,336,796 | \$10,287,596 | | -\$80,414,483 | | -\$2,492,202 | \$0 | \$0 | \$0 | -\$82,906,685 | \$41,218,938 | \$710,175,590 |
| 01/01/2030 | 12/31/2030 | \$2,196,595 | \$9,819,133 | | -\$78,827,374 | | -\$2,506,113 | \$0 | \$0 | \$0 | -\$81,333,487 | \$39,546,544 | \$680,404,375 |
| 01/01/2031 | 12/31/2031 | \$2,064,795 | \$5,486,865 | | -\$76,991,490 | | -\$2,713,647 | \$0 | \$0 | \$0 | -\$79,705,137 | \$37,723,162 | \$645,974,060 |
| 01/01/2032 | 12/31/2032 | \$2,064,795 | \$5,271,206 | | -\$75,151,017 | | -\$2,726,887 | \$0 | \$0 | \$0 | -\$77,877,904 | \$35,755,457 | \$611,187,614 |
| 01/01/2033 | 12/31/2033 | \$2,064,795 | \$4,991,701 | | -\$73,003,388 | | -\$2,740,461 | \$0 | \$0 | \$0 | -\$75,743,849 | \$33,773,924 | \$576,274,185 |
| 01/01/2034 | 12/31/2034 | \$2,064,795 | \$4,455,576 | | -\$70,785,036 | | -\$2,753,874 | \$0 | \$0 | \$0 | -\$73,538,910 | \$31,779,608 | \$541,035,254 |
| 01/01/2035 | 12/31/2035 | \$2,064,795 | \$4,137,048 | | -\$68,339,486 | | -\$2,767,382 | \$0 | \$0 | \$0 | -\$71,106,868 | \$29,779,072 | \$505,909,301 |
| 01/01/2036 | 12/31/2036 | \$2,064,795 | \$4,101,645 | | -\$65,747,303 | | -\$2,781,135 | \$0 | \$0 | \$0 | -\$68,528,438 | \$27,797,530 | \$471,344,833 |
| 01/01/2037 | 12/31/2037 | \$2,064,795 | \$4,100,796 | | -\$63,133,516 | | -\$2,795,324 | \$0 | \$0 | \$0 | -\$65,928,840 | \$25,850,442 | \$437,432,026 |
| 01/01/2038 | 12/31/2038 | \$2,064,795 | \$3,782,322 | | -\$60,370,186 | | -\$2,809,727 | \$0 | \$0 | \$0 | -\$63,179,913 | \$23,936,623 | \$404,035,853 |
| 01/01/2039 | 12/31/2039 | \$2,064,795 | \$3,351,614 | | -\$57,706,266 | | -\$2,824,650 | \$0 | \$0 | \$0 | -\$60,530,916 | \$22,046,910 | \$370,968,256 |
| 01/01/2040 | 12/31/2040 | \$2,064,795 | \$2,632,206 | | -\$54,979,960 | | -\$2,840,097 | \$0 | \$0 | \$0 | -\$57,820,057 | \$20,169,877 | \$338,015,077 |
| 01/01/2041 | 12/31/2041 | \$2,064,795 | \$1,312,669 | | -\$52,244,553 | | -\$2,856,992 | \$0 | \$0 | \$0 | -\$55,101,545 | \$18,282,455 | \$304,573,451 |
| 01/01/2042 | 12/31/2042 | \$2,064,795 | \$400,604 | | -\$49,510,570 | | -\$2,874,468 | \$0 | \$0 | \$0 | -\$52,385,038 | \$16,378,149 | \$271,031,961 |
| 01/01/2043 | 12/31/2043 | \$2,064,795 | \$0 | | -\$46,815,223 | | -\$2,892,651 | \$0 | \$0 | \$0 | -\$49,707,874 | \$14,481,615 | \$237,870,497 |
| 01/01/2044 | 12/31/2044 | \$2,064,795 | \$0 | | -\$44,085,432 | | -\$2,911,444 | \$0 | \$0 | \$0 | -\$46,996,876 | \$12,619,839 | \$205,558,255 |
| 01/01/2045 | 12/31/2045 | \$2,064,795 | \$0 | | -\$41,498,272 | | -\$2,931,186 | \$0 | \$0 | \$0 | -\$44,429,458 | \$10,803,603 | \$173,997,195 |
| 01/01/2046 | 12/31/2046 | \$2,064,795 | \$0 | | -\$38,940,416 | | -\$2,952,190 | \$0 | \$0 | \$0 | -\$41,892,606 | \$9,030,429 | \$143,199,813 |
| 01/01/2047 | 12/31/2047 | \$2,064,795 | \$0 | | -\$36,446,035 | | -\$2,974,211 | \$0 | \$0 | \$0 | -\$39,420,246 | \$7,300,071 | \$113,144,433 |
| 01/01/2048 | 12/31/2048 | \$2,064,795 | \$0 | | -\$34,106,302 | | -\$2,997,291 | \$0 | \$0 | \$0 | -\$37,103,593 | \$5,608,630 | \$83,714,265 |
| 01/01/2049 | 12/31/2049 | \$2,064,795 | \$0 | | -\$31,821,997 | | -\$2,863,980 | \$0 | \$0 | \$0 | -\$34,685,977 | \$3,956,676 | \$55,049,759 |
| 01/01/2050 | 12/31/2050 | \$2,064,795 | \$0 | | -\$29,624,013 | | -\$2,666,161 | \$0 | \$0 | \$0 | -\$32,290,174 | \$2,348,884 | \$27,173,264 |
| 01/01/2051 | 12/31/2051 | \$2,064,795 | \$0 | | -\$27,542,726 | | -\$2,478,845 | \$0 | \$0 | \$0 | -\$30,021,571 | \$783,522 | \$10 |

TEMPLATE 6A - Sheet 6A-3

| | |
|-------------------------------|---|
| Item Description (from 6A-1): | Update Late Retirement Adjustment Factor for TVs Added Back |
|-------------------------------|---|

Reconciliation - Details for the "basic method" under § 4262.4(a)(1) for non-MPRA plans, or for the "increasing assets method" under § 4262.4(a)(2)(i) for MPRA plans for which the requested amount of SFA is determined under that method

See Template 4A instructions for Sheet 4A-4 or Sheet 4A-5, except provide the projection used to determine the intermediate SFA amount.

PLAN INFORMATION

| | |
|--|---------------|
| Abbreviated Plan Name: | NPP |
| EIN: | 13-6212879 |
| PN: | 001 |
| MPRA Plan? | No |
| If a MPRA Plan, which method yields the greatest amount of SFA? | N/A |
| SFA Measurement Date: | 12/31/2022 |
| Fair Market Value of Assets as of the SFA Measurement Date: | \$445,144,385 |
| SFA Amount as of the SFA Measurement Date under the method calculated in this Sheet: | \$507,089,561 |
| Non-SFA Interest Rate: | 5.85% |
| SFA Interest Rate: | 3.77% |

On this Sheet, show payments INTO the plan as positive amounts, and payments OUT of the plan as negative amounts.

| SFA Measurement Date / Plan Year Start Date | Plan Year End Date | (1) Contributions | (2) Withdrawal Liability Payments | (3) Other Payments to Plan (excluding financial assistance and SFA) | (4) Benefit Payments | (5) Make-up Payments Attributable to Reinstatement of Benefits Suspended through the SFA Measurement Date | (6) Administrative Expenses (excluding amount owed PBGC under 4261 of ERISA) | (7) Benefit Payments (from (4) and (5)) and Administrative Expenses (from (6)) Paid from SFA Assets | (8) SFA Investment Income Based on SFA Interest Rate | (9) Projected SFA Assets at End of Plan Year (prior year assets + (7) + (8)) | (10) Benefit Payments (from (4) and (5)) and Administrative Expenses (from (6)) Paid from Non-SFA Assets | (11) Non-SFA Investment Income Based on Non-SFA Interest Rate | (12) Projected Non-SFA Assets at End of Plan Year (prior year assets + (1) + (2) + (3) + (10) + (11)) |
|---|--------------------|----------------------|--------------------------------------|--|-------------------------|--|---|--|---|---|---|--|--|
| | 12/31/2022 | | | | | | | | | \$507,089,561 | | | \$445,144,385 |
| 01/01/2023 | 12/31/2023 | \$3,387,268 | \$14,529,502 | | -\$87,928,548 | | -\$2,535,284 | -\$90,463,832 | \$17,427,809 | \$434,053,538 | \$0 | \$26,557,564 | \$489,618,719 |
| 01/01/2024 | 12/31/2024 | \$3,184,039 | \$14,575,226 | | -\$85,395,045 | -\$40,138,014 | -\$2,416,158 | -\$127,949,217 | \$13,210,687 | \$319,315,008 | \$0 | \$29,154,771 | \$536,532,755 |
| 01/01/2025 | 12/31/2025 | \$2,993,006 | \$14,575,226 | | -\$84,766,728 | | -\$2,432,470 | -\$87,199,198 | \$10,409,678 | \$242,525,488 | \$0 | \$31,893,734 | \$585,994,721 |
| 01/01/2026 | 12/31/2026 | \$2,813,430 | \$11,507,315 | | -\$83,839,980 | | -\$2,447,824 | -\$86,287,804 | \$7,531,733 | \$163,769,417 | \$0 | \$34,693,620 | \$635,009,086 |
| 01/01/2027 | 12/31/2027 | \$2,644,624 | \$11,068,158 | | -\$82,851,579 | | -\$2,463,157 | -\$85,314,736 | \$4,580,802 | \$83,035,483 | \$0 | \$37,543,430 | \$686,265,298 |
| 01/01/2028 | 12/31/2028 | \$2,485,957 | \$10,680,683 | | -\$81,706,683 | | -\$2,477,795 | -\$83,035,483 | \$0 | \$0 | -\$1,148,995 | \$40,493,040 | \$738,775,983 |
| 01/01/2029 | 12/31/2029 | \$2,336,796 | \$10,287,596 | | -\$80,345,291 | | -\$2,492,202 | \$0 | \$0 | \$0 | -\$82,837,493 | \$41,193,850 | \$709,756,732 |
| 01/01/2030 | 12/31/2030 | \$2,196,595 | \$9,819,133 | | -\$78,762,259 | | -\$2,506,113 | \$0 | \$0 | \$0 | -\$81,268,372 | \$39,523,918 | \$680,028,006 |
| 01/01/2031 | 12/31/2031 | \$2,064,795 | \$5,486,865 | | -\$76,930,524 | | -\$2,713,647 | \$0 | \$0 | \$0 | -\$79,644,171 | \$37,702,902 | \$645,638,397 |
| 01/01/2032 | 12/31/2032 | \$2,064,795 | \$5,271,206 | | -\$75,094,299 | | -\$2,726,887 | \$0 | \$0 | \$0 | -\$77,821,186 | \$35,737,456 | \$610,890,668 |
| 01/01/2033 | 12/31/2033 | \$2,064,795 | \$4,991,701 | | -\$72,950,932 | | -\$2,740,461 | \$0 | \$0 | \$0 | -\$75,691,393 | \$33,758,065 | \$576,013,836 |
| 01/01/2034 | 12/31/2034 | \$2,064,795 | \$4,455,576 | | -\$70,736,875 | | -\$2,753,874 | \$0 | \$0 | \$0 | -\$73,490,749 | \$31,765,766 | \$540,809,224 |
| 01/01/2035 | 12/31/2035 | \$2,064,795 | \$4,137,048 | | -\$68,295,601 | | -\$2,767,382 | \$0 | \$0 | \$0 | -\$71,062,983 | \$29,767,115 | \$505,715,199 |
| 01/01/2036 | 12/31/2036 | \$2,064,795 | \$4,101,645 | | -\$65,707,651 | | -\$2,781,135 | \$0 | \$0 | \$0 | -\$68,488,786 | \$27,787,318 | \$471,180,171 |
| 01/01/2037 | 12/31/2037 | \$2,064,795 | \$4,100,796 | | -\$63,098,040 | | -\$2,795,324 | \$0 | \$0 | \$0 | -\$65,893,364 | \$25,841,832 | \$437,294,230 |
| 01/01/2038 | 12/31/2038 | \$2,064,795 | \$3,782,322 | | -\$60,338,777 | | -\$2,809,727 | \$0 | \$0 | \$0 | -\$63,148,504 | \$23,929,468 | \$403,922,311 |
| 01/01/2039 | 12/31/2039 | \$2,064,795 | \$3,351,614 | | -\$57,678,818 | | -\$2,824,650 | \$0 | \$0 | \$0 | -\$60,503,468 | \$22,041,059 | \$370,876,311 |
| 01/01/2040 | 12/31/2040 | \$2,064,795 | \$2,632,206 | | -\$54,956,296 | | -\$2,840,097 | \$0 | \$0 | \$0 | -\$57,796,393 | \$20,165,181 | \$337,942,100 |
| 01/01/2041 | 12/31/2041 | \$2,064,795 | \$1,312,669 | | -\$52,224,467 | | -\$2,856,992 | \$0 | \$0 | \$0 | -\$55,081,459 | \$18,278,765 | \$304,516,870 |
| 01/01/2042 | 12/31/2042 | \$2,064,795 | \$400,604 | | -\$49,493,824 | | -\$2,874,468 | \$0 | \$0 | \$0 | -\$52,368,292 | \$16,375,322 | \$270,989,299 |
| 01/01/2043 | 12/31/2043 | \$2,064,795 | \$0 | | -\$46,801,552 | | -\$2,892,651 | \$0 | \$0 | \$0 | -\$49,694,203 | \$14,479,514 | \$237,839,405 |
| 01/01/2044 | 12/31/2044 | \$2,064,795 | \$0 | | -\$44,074,525 | | -\$2,911,444 | \$0 | \$0 | \$0 | -\$46,985,969 | \$12,618,335 | \$205,536,566 |
| 01/01/2045 | 12/31/2045 | \$2,064,795 | \$0 | | -\$41,489,835 | | -\$2,931,186 | \$0 | \$0 | \$0 | -\$44,421,021 | \$10,802,577 | \$173,982,917 |
| 01/01/2046 | 12/31/2046 | \$2,064,795 | \$0 | | -\$38,934,137 | | -\$2,952,190 | \$0 | \$0 | \$0 | -\$41,886,327 | \$9,029,775 | \$143,191,160 |
| 01/01/2047 | 12/31/2047 | \$2,064,795 | \$0 | | -\$36,441,607 | | -\$2,974,211 | \$0 | \$0 | \$0 | -\$39,415,818 | \$7,299,693 | \$113,139,830 |
| 01/01/2048 | 12/31/2048 | \$2,064,795 | \$0 | | -\$34,103,447 | | -\$2,997,291 | \$0 | \$0 | \$0 | -\$37,100,738 | \$5,608,443 | \$83,712,330 |
| 01/01/2049 | 12/31/2049 | \$2,064,795 | \$0 | | -\$31,820,433 | | -\$2,863,839 | \$0 | \$0 | \$0 | -\$34,684,272 | \$3,956,612 | \$55,049,465 |
| 01/01/2050 | 12/31/2050 | \$2,064,795 | \$0 | | -\$29,623,482 | | -\$2,666,113 | \$0 | \$0 | \$0 | -\$32,289,595 | \$2,348,883 | \$27,173,548 |
| 01/01/2051 | 12/31/2051 | \$2,064,795 | \$0 | | -\$27,542,998 | | -\$2,478,870 | \$0 | \$0 | \$0 | -\$30,021,868 | \$783,530 | \$5 |

TEMPLATE 6A - Sheet 6A-4

| | |
|-------------------------------|--------------------------------|
| Item Description (from 6A-1): | Update Administrative Expenses |
|-------------------------------|--------------------------------|

Reconciliation - Details for the "basic method" under § 4262.4(a)(1) for non-MPRA plans, or for the "increasing assets method" under § 4262.4(a)(2)(i) for MPRA plans for which the requested amount of SFA is determined under that method

See Template 4A instructions for Sheet 4A-4 or Sheet 4A-5, except provide the projection used to determine the intermediate SFA amount.

PLAN INFORMATION

| | |
|--|---------------|
| Abbreviated Plan Name: | NPP |
| EIN: | 13-6212879 |
| PN: | 001 |
| MPRA Plan? | No |
| If a MPRA Plan, which method yields the greatest amount of SFA? | N/A |
| SFA Measurement Date: | 12/31/2022 |
| Fair Market Value of Assets as of the SFA Measurement Date: | \$445,144,385 |
| SFA Amount as of the SFA Measurement Date under the method calculated in this Sheet: | \$508,245,267 |
| Non-SFA Interest Rate: | 5.85% |
| SFA Interest Rate: | 3.77% |

On this Sheet, show payments INTO the plan as positive amounts, and payments OUT of the plan as negative amounts.

| SFA Measurement Date / Plan Year Start Date | Plan Year End Date | (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) | (9) | (10) | (11) | (12) |
|---|--------------------|---------------|-------------------------------|---|------------------|---|--|---|--|--|---|--|--|
| | | Contributions | Withdrawal Liability Payments | Other Payments to Plan (excluding financial assistance and SFA) | Benefit Payments | Make-up Payments Attributable to Reinstatement of Benefits Suspended through the SFA Measurement Date | Administrative Expenses (excluding amount owed PBGC under 4261 of ERISA) | Benefit Payments (from (4) and (5)) and Administrative Expenses (from (6)) Paid from SFA Assets | SFA Investment Income Based on SFA Interest Rate | Projected SFA Assets at End of Plan Year (prior year assets + (7) + (8)) | Benefit Payments (from (4) and (5)) and Administrative Expenses (from (6)) Paid from Non-SFA Assets | Non-SFA Investment Income Based on Non-SFA Interest Rate | Projected Non-SFA Assets at End of Plan Year (prior year assets + (1) + (2) + (3) + (10) + (11)) |
| | 12/31/2022 | | | | | | | | | \$508,245,267 | | | \$445,144,385 |
| 01/01/2023 | 12/31/2023 | \$3,387,268 | \$14,529,502 | | -\$87,928,548 | | -\$2,543,000 | -\$90,471,548 | \$17,471,235 | \$435,244,954 | \$0 | \$26,557,564 | \$489,618,719 |
| 01/01/2024 | 12/31/2024 | \$3,184,039 | \$14,575,226 | | -\$85,395,045 | -\$40,138,014 | -\$2,435,886 | -\$127,968,945 | \$13,255,235 | \$320,531,244 | \$0 | \$29,154,771 | \$536,532,755 |
| 01/01/2025 | 12/31/2025 | \$2,993,006 | \$14,575,226 | | -\$84,766,728 | | -\$2,464,431 | -\$87,231,159 | \$10,454,933 | \$243,755,018 | \$0 | \$31,893,734 | \$585,994,721 |
| 01/01/2026 | 12/31/2026 | \$2,813,430 | \$11,507,315 | | -\$83,839,980 | | -\$2,492,229 | -\$86,332,209 | \$7,577,257 | \$165,000,066 | \$0 | \$34,693,620 | \$635,009,086 |
| 01/01/2027 | 12/31/2027 | \$2,644,624 | \$11,068,158 | | -\$82,851,579 | | -\$2,520,220 | -\$85,371,799 | \$4,626,132 | \$84,254,399 | \$0 | \$37,543,430 | \$686,265,298 |
| 01/01/2028 | 12/31/2028 | \$2,485,957 | \$10,680,683 | | -\$81,706,683 | | -\$2,547,716 | -\$84,254,399 | \$1,602,888 | \$1,602,888 | \$0 | \$40,526,171 | \$739,958,109 |
| 01/01/2029 | 12/31/2029 | \$2,336,796 | \$10,287,596 | | -\$80,345,291 | | -\$2,575,184 | -\$1,602,888 | \$0 | \$0 | -\$81,317,587 | \$41,306,830 | \$712,571,744 |
| 01/01/2030 | 12/31/2030 | \$2,196,595 | \$9,819,133 | | -\$78,762,259 | | -\$2,602,350 | \$0 | \$0 | \$0 | -\$81,364,609 | \$39,685,821 | \$682,908,684 |
| 01/01/2031 | 12/31/2031 | \$2,064,795 | \$5,486,865 | | -\$76,930,524 | | -\$2,794,527 | \$0 | \$0 | \$0 | -\$79,725,051 | \$37,869,089 | \$648,604,382 |
| 01/01/2032 | 12/31/2032 | \$2,064,795 | \$5,271,206 | | -\$75,094,299 | | -\$2,822,914 | \$0 | \$0 | \$0 | -\$77,917,213 | \$35,908,197 | \$613,931,367 |
| 01/01/2033 | 12/31/2033 | \$2,064,795 | \$4,991,701 | | -\$72,950,932 | | -\$2,851,877 | \$0 | \$0 | \$0 | -\$75,802,809 | \$33,932,734 | \$579,117,788 |
| 01/01/2034 | 12/31/2034 | \$2,064,795 | \$4,455,576 | | -\$70,736,875 | | -\$2,880,920 | \$0 | \$0 | \$0 | -\$73,617,795 | \$31,943,684 | \$543,964,048 |
| 01/01/2035 | 12/31/2035 | \$2,064,795 | \$4,137,048 | | -\$68,295,601 | | -\$2,910,302 | \$0 | \$0 | \$0 | -\$71,205,903 | \$29,947,551 | \$508,907,539 |
| 01/01/2036 | 12/31/2036 | \$2,064,795 | \$4,101,645 | | -\$65,707,651 | | -\$2,940,185 | \$0 | \$0 | \$0 | -\$68,647,836 | \$27,969,484 | \$474,395,627 |
| 01/01/2037 | 12/31/2037 | \$2,064,795 | \$4,100,796 | | -\$63,098,040 | | -\$2,970,771 | \$0 | \$0 | \$0 | -\$66,068,811 | \$26,024,877 | \$440,517,284 |
| 01/01/2038 | 12/31/2038 | \$2,064,795 | \$3,782,322 | | -\$60,338,777 | | -\$3,001,840 | \$0 | \$0 | \$0 | -\$63,340,617 | \$24,112,477 | \$407,136,261 |
| 01/01/2039 | 12/31/2039 | \$2,064,795 | \$3,351,614 | | -\$57,678,818 | | -\$3,033,715 | \$0 | \$0 | \$0 | -\$60,712,533 | \$22,223,047 | \$374,063,184 |
| 01/01/2040 | 12/31/2040 | \$2,064,795 | \$2,632,206 | | -\$54,956,296 | | -\$3,066,414 | \$0 | \$0 | \$0 | -\$58,022,710 | \$20,345,087 | \$341,082,562 |
| 01/01/2041 | 12/31/2041 | \$2,064,795 | \$1,312,669 | | -\$52,224,467 | | -\$3,100,919 | \$0 | \$0 | \$0 | -\$55,325,386 | \$18,455,448 | \$307,590,088 |
| 01/01/2042 | 12/31/2042 | \$2,064,795 | \$400,604 | | -\$49,493,824 | | -\$3,136,341 | \$0 | \$0 | \$0 | -\$52,630,165 | \$16,547,555 | \$273,972,877 |
| 01/01/2043 | 12/31/2043 | \$2,064,795 | \$0 | | -\$46,801,552 | | -\$3,172,822 | \$0 | \$0 | \$0 | -\$49,974,374 | \$14,645,975 | \$240,709,273 |
| 01/01/2044 | 12/31/2044 | \$2,064,795 | \$0 | | -\$44,074,525 | | -\$3,210,273 | \$0 | \$0 | \$0 | -\$47,284,798 | \$12,777,606 | \$208,266,876 |
| 01/01/2045 | 12/31/2045 | \$2,064,795 | \$0 | | -\$41,489,835 | | -\$3,249,076 | \$0 | \$0 | \$0 | -\$44,738,911 | \$10,953,134 | \$176,545,894 |
| 01/01/2046 | 12/31/2046 | \$2,064,795 | \$0 | | -\$38,934,137 | | -\$3,289,580 | \$0 | \$0 | \$0 | -\$42,223,717 | \$9,169,981 | \$145,556,953 |
| 01/01/2047 | 12/31/2047 | \$2,064,795 | \$0 | | -\$36,441,607 | | -\$3,279,745 | \$0 | \$0 | \$0 | -\$39,721,352 | \$7,429,282 | \$115,329,678 |
| 01/01/2048 | 12/31/2048 | \$2,064,795 | \$0 | | -\$34,103,447 | | -\$3,069,310 | \$0 | \$0 | \$0 | -\$37,172,757 | \$5,734,473 | \$85,956,189 |
| 01/01/2049 | 12/31/2049 | \$2,064,795 | \$0 | | -\$31,820,433 | | -\$2,863,839 | \$0 | \$0 | \$0 | -\$34,684,272 | \$4,087,878 | \$57,424,590 |
| 01/01/2050 | 12/31/2050 | \$2,064,795 | \$0 | | -\$29,623,482 | | -\$2,666,113 | \$0 | \$0 | \$0 | -\$32,289,595 | \$2,487,828 | \$29,687,618 |
| 01/01/2051 | 12/31/2051 | \$2,064,795 | \$0 | | -\$27,542,998 | | -\$2,478,870 | \$0 | \$0 | \$0 | -\$30,021,868 | \$930,603 | \$2,661,148 |

TEMPLATE 6A - Sheet 6A-5

| | |
|-------------------------------|-------------------------------------|
| Item Description (from 6A-1): | Withdrawal Liability Collectability |
|-------------------------------|-------------------------------------|

Reconciliation - Details for the "basic method" under § 4262.4(a)(1) for non-MPRA plans, or for the "increasing assets method" under § 4262.4(a)(2)(i) for MPRA plans for which the requested amount of SFA is determined under that method

See Template 4A instructions for Sheet 4A-4 or Sheet 4A-5, except provide the projection used to determine the intermediate SFA amount.

PLAN INFORMATION

| | |
|--|---------------|
| Abbreviated Plan Name: | NPP |
| EIN: | 13-6212879 |
| PN: | 001 |
| MPRA Plan? | No |
| If a MPRA Plan, which method yields the greatest amount of SFA? | N/A |
| SFA Measurement Date: | 12/31/2022 |
| Fair Market Value of Assets as of the SFA Measurement Date: | \$445,144,385 |
| SFA Amount as of the SFA Measurement Date under the method calculated in this Sheet: | \$525,506,042 |
| Non-SFA Interest Rate: | 5.85% |
| SFA Interest Rate: | 3.77% |

On this Sheet, show payments INTO the plan as positive amounts, and payments OUT of the plan as negative amounts.

| SFA Measurement Date / Plan Year Start Date | Plan Year End Date | (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) | (9) | (10) | (11) | (12) |
|---|--------------------|---------------|-------------------------------|---|------------------|---|--|---|--|--|---|--|--|
| | | Contributions | Withdrawal Liability Payments | Other Payments to Plan (excluding financial assistance and SFA) | Benefit Payments | Make-up Payments Attributable to Reinstatement of Benefits Suspended through the SFA Measurement Date | Administrative Expenses (excluding amount owed PBGC under 4261 of ERISA) | Benefit Payments (from (4) and (5)) and Administrative Expenses (from (6)) Paid from SFA Assets | SFA Investment Income Based on SFA Interest Rate | Projected SFA Assets at End of Plan Year (prior year assets + (7) + (8)) | Benefit Payments (from (4) and (5)) and Administrative Expenses (from (6)) Paid from Non-SFA Assets | Non-SFA Investment Income Based on Non-SFA Interest Rate | Projected Non-SFA Assets at End of Plan Year (prior year assets + (1) + (2) + (3) + (10) + (11)) |
| | 12/31/2022 | | | | | | | | | \$525,506,042 | | | \$445,144,385 |
| 01/01/2023 | 12/31/2023 | \$3,387,268 | \$11,768,897 | | -\$87,928,548 | | -\$2,543,000 | -\$90,471,548 | \$18,121,966 | \$453,156,460 | \$0 | \$26,477,964 | \$486,778,514 |
| 01/01/2024 | 12/31/2024 | \$3,184,039 | \$11,833,056 | | -\$85,395,045 | -\$40,138,014 | -\$2,435,886 | -\$127,968,945 | \$13,930,499 | \$339,118,014 | \$0 | \$28,909,550 | \$530,705,159 |
| 01/01/2025 | 12/31/2025 | \$2,993,006 | \$11,886,860 | | -\$84,766,728 | | -\$2,464,431 | -\$87,231,159 | \$11,155,654 | \$263,042,509 | \$0 | \$31,475,302 | \$577,060,327 |
| 01/01/2026 | 12/31/2026 | \$2,813,430 | \$9,454,550 | | -\$83,839,980 | | -\$2,492,229 | -\$86,332,209 | \$8,304,396 | \$185,014,696 | \$0 | \$34,111,768 | \$623,440,075 |
| 01/01/2027 | 12/31/2027 | \$2,644,624 | \$9,150,323 | | -\$82,851,579 | | -\$2,520,220 | -\$85,371,799 | \$5,380,684 | \$105,023,581 | \$0 | \$36,811,343 | \$672,046,365 |
| 01/01/2028 | 12/31/2028 | \$2,485,957 | \$8,886,504 | | -\$81,706,683 | | -\$2,547,716 | -\$84,254,399 | \$2,385,887 | \$23,155,069 | \$0 | \$39,642,629 | \$723,061,455 |
| 01/01/2029 | 12/31/2029 | \$2,336,796 | \$8,616,392 | | -\$80,345,291 | | -\$2,575,184 | -\$23,155,069 | \$0 | \$0 | -\$59,765,406 | \$40,891,629 | \$715,140,866 |
| 01/01/2030 | 12/31/2030 | \$2,196,595 | \$8,282,164 | | -\$78,762,259 | | -\$2,602,350 | \$0 | \$0 | \$0 | -\$81,364,609 | \$39,791,797 | \$684,046,813 |
| 01/01/2031 | 12/31/2031 | \$2,064,795 | \$4,814,244 | | -\$76,930,524 | | -\$2,794,527 | \$0 | \$0 | \$0 | -\$79,725,051 | \$37,916,275 | \$649,117,076 |
| 01/01/2032 | 12/31/2032 | \$2,064,795 | \$4,676,900 | | -\$75,094,299 | | -\$2,822,914 | \$0 | \$0 | \$0 | -\$77,917,213 | \$35,921,053 | \$613,862,611 |
| 01/01/2033 | 12/31/2033 | \$2,064,795 | \$4,468,122 | | -\$72,950,932 | | -\$2,851,877 | \$0 | \$0 | \$0 | -\$75,802,809 | \$33,913,614 | \$578,506,333 |
| 01/01/2034 | 12/31/2034 | \$2,064,795 | \$4,033,861 | | -\$70,736,875 | | -\$2,880,920 | \$0 | \$0 | \$0 | -\$73,617,795 | \$31,895,754 | \$542,882,948 |
| 01/01/2035 | 12/31/2035 | \$2,064,795 | \$3,775,853 | | -\$68,295,601 | | -\$2,910,302 | \$0 | \$0 | \$0 | -\$71,205,903 | \$29,873,892 | \$507,391,585 |
| 01/01/2036 | 12/31/2036 | \$2,064,795 | \$3,747,177 | | -\$65,707,651 | | -\$2,940,185 | \$0 | \$0 | \$0 | -\$68,647,836 | \$27,870,580 | \$472,426,301 |
| 01/01/2037 | 12/31/2037 | \$2,064,795 | \$3,746,489 | | -\$63,098,040 | | -\$2,970,771 | \$0 | \$0 | \$0 | -\$66,068,811 | \$25,899,455 | \$438,068,229 |
| 01/01/2038 | 12/31/2038 | \$2,064,795 | \$3,488,525 | | -\$60,338,777 | | -\$3,001,840 | \$0 | \$0 | \$0 | -\$63,340,617 | \$23,960,736 | \$404,241,668 |
| 01/01/2039 | 12/31/2039 | \$2,064,795 | \$3,139,652 | | -\$57,678,818 | | -\$3,033,715 | \$0 | \$0 | \$0 | -\$60,712,533 | \$22,047,601 | \$370,781,183 |
| 01/01/2040 | 12/31/2040 | \$2,064,795 | \$2,556,931 | | -\$54,956,296 | | -\$3,066,414 | \$0 | \$0 | \$0 | -\$58,022,710 | \$20,150,920 | \$337,531,119 |
| 01/01/2041 | 12/31/2041 | \$2,064,795 | \$1,488,106 | | -\$52,224,467 | | -\$3,100,919 | \$0 | \$0 | \$0 | -\$55,325,386 | \$18,252,748 | \$304,011,382 |
| 01/01/2042 | 12/31/2042 | \$2,064,795 | \$749,333 | | -\$49,493,824 | | -\$3,136,341 | \$0 | \$0 | \$0 | -\$52,630,165 | \$16,348,256 | \$270,543,601 |
| 01/01/2043 | 12/31/2043 | \$2,064,795 | \$424,844 | | -\$46,801,552 | | -\$3,172,822 | \$0 | \$0 | \$0 | -\$49,974,374 | \$14,457,612 | \$237,516,478 |
| 01/01/2044 | 12/31/2044 | \$2,064,795 | \$397,721 | | -\$44,074,525 | | -\$3,210,273 | \$0 | \$0 | \$0 | -\$47,284,798 | \$12,602,295 | \$205,296,491 |
| 01/01/2045 | 12/31/2045 | \$2,064,795 | \$343,917 | | -\$41,489,835 | | -\$3,249,076 | \$0 | \$0 | \$0 | -\$44,738,911 | \$10,789,283 | \$173,755,575 |
| 01/01/2046 | 12/31/2046 | \$2,064,795 | \$291,219 | | -\$38,934,137 | | -\$3,289,580 | \$0 | \$0 | \$0 | -\$42,223,717 | \$9,015,144 | \$142,903,016 |
| 01/01/2047 | 12/31/2047 | \$2,064,795 | \$239,729 | | -\$36,441,607 | | -\$3,279,745 | \$0 | \$0 | \$0 | -\$39,721,352 | \$7,280,939 | \$112,767,127 |
| 01/01/2048 | 12/31/2048 | \$2,064,795 | \$189,693 | | -\$34,103,447 | | -\$3,069,310 | \$0 | \$0 | \$0 | -\$37,172,757 | \$5,590,033 | \$83,438,891 |
| 01/01/2049 | 12/31/2049 | \$2,064,795 | \$141,404 | | -\$31,820,433 | | -\$2,863,839 | \$0 | \$0 | \$0 | -\$34,684,272 | \$3,944,693 | \$54,905,511 |
| 01/01/2050 | 12/31/2050 | \$2,064,795 | \$96,178 | | -\$29,623,482 | | -\$2,666,113 | \$0 | \$0 | \$0 | -\$32,289,595 | \$2,343,235 | \$27,120,124 |
| 01/01/2051 | 12/31/2051 | \$2,064,795 | \$54,961 | | -\$27,542,998 | | -\$2,478,870 | \$0 | \$0 | \$0 | -\$30,021,868 | \$781,990 | \$2 |

TEMPLATE 6A - Sheet 6A-5

| | |
|-------------------------------|---------------------|
| Item Description (from 6A-1): | Update CBU Declines |
|-------------------------------|---------------------|

Reconciliation - Details for the "basic method" under § 4262.4(a)(1) for non-MPRA plans, or for the "increasing assets method" under § 4262.4(a)(2)(i) for MPRA plans for which the requested amount of SFA is determined under that method

See Template 4A instructions for Sheet 4A-4 or Sheet 4A-5, except provide the projection used to determine the intermediate SFA amount.

PLAN INFORMATION

| | |
|--|---------------|
| Abbreviated Plan Name: | NPP |
| EIN: | 13-6212879 |
| PN: | 001 |
| MPRA Plan? | No |
| If a MPRA Plan, which method yields the greatest amount of SFA? | N/A |
| SFA Measurement Date: | 12/31/2022 |
| Fair Market Value of Assets as of the SFA Measurement Date: | \$445,144,385 |
| SFA Amount as of the SFA Measurement Date under the method calculated in this Sheet: | \$526,556,319 |
| Non-SFA Interest Rate: | 5.85% |
| SFA Interest Rate: | 3.77% |

On this Sheet, show payments INTO the plan as positive amounts, and payments OUT of the plan as negative amounts.

| SFA Measurement Date / Plan Year Start Date | Plan Year End Date | (1) Contributions | (2) Withdrawal Liability Payments | (3) Other Payments to Plan (excluding financial assistance and SFA) | (4) Benefit Payments | (5) Make-up Payments Attributable to Reinstatement of Benefits Suspended through the SFA Measurement Date | (6) Administrative Expenses (excluding amount owed PBGC under 4261 of ERISA) | (7) Benefit Payments (from (4) and (5)) and Administrative Expenses (from (6)) Paid from SFA Assets | (8) SFA Investment Income Based on SFA Interest Rate | (9) Projected SFA Assets at End of Plan Year (prior year assets + (7) + (8)) | (10) Benefit Payments (from (4) and (5)) and Administrative Expenses (from (6)) Paid from Non-SFA Assets | (11) Non-SFA Investment Income Based on Non-SFA Interest Rate | (12) Projected Non-SFA Assets at End of Plan Year (prior year assets + (1) + (2) + (3) + (10) + (11)) |
|---|--------------------|----------------------|--------------------------------------|--|-------------------------|--|---|--|---|---|---|--|--|
| | 12/31/2022 | | | | | | | | | \$526,556,319 | | | \$445,144,385 |
| 01/01/2023 | 12/31/2023 | \$3,387,268 | \$11,768,897 | | -\$87,928,548 | | -\$2,543,000 | -\$90,471,548 | \$18,161,562 | \$454,246,333 | \$0 | \$26,477,964 | \$486,778,514 |
| 01/01/2024 | 12/31/2024 | \$3,184,039 | \$11,833,056 | | -\$85,395,045 | -\$40,138,014 | -\$2,435,886 | -\$127,968,945 | \$13,971,587 | \$340,248,975 | \$0 | \$28,909,550 | \$530,705,159 |
| 01/01/2025 | 12/31/2025 | \$2,993,006 | \$11,886,860 | | -\$84,766,728 | | -\$2,464,431 | -\$87,231,159 | \$11,198,291 | \$264,216,107 | \$0 | \$31,475,302 | \$577,060,327 |
| 01/01/2026 | 12/31/2026 | \$2,813,430 | \$9,454,550 | | -\$83,839,980 | | -\$2,492,229 | -\$86,332,209 | \$8,348,641 | \$186,232,539 | \$0 | \$34,111,768 | \$623,440,075 |
| 01/01/2027 | 12/31/2027 | \$2,644,624 | \$9,150,323 | | -\$82,851,579 | | -\$2,520,220 | -\$85,371,799 | \$5,426,596 | \$106,287,336 | \$0 | \$36,811,343 | \$672,046,365 |
| 01/01/2028 | 12/31/2028 | \$2,485,957 | \$8,886,504 | | -\$81,706,683 | | -\$2,547,716 | -\$84,254,399 | \$2,433,530 | \$24,466,467 | \$0 | \$39,642,629 | \$723,061,455 |
| 01/01/2029 | 12/31/2029 | \$2,336,796 | \$8,616,392 | | -\$80,345,291 | | -\$2,575,184 | -\$24,466,467 | \$0 | \$0 | -\$58,454,008 | \$40,929,443 | \$716,490,078 |
| 01/01/2030 | 12/31/2030 | \$2,196,595 | \$8,282,164 | | -\$78,762,259 | | -\$2,602,350 | \$0 | \$0 | \$0 | -\$81,364,609 | \$39,870,726 | \$685,474,954 |
| 01/01/2031 | 12/31/2031 | \$2,064,795 | \$4,814,244 | | -\$76,930,524 | | -\$2,794,527 | \$0 | \$0 | \$0 | -\$79,725,051 | \$37,999,822 | \$650,628,764 |
| 01/01/2032 | 12/31/2032 | \$2,044,154 | \$4,676,900 | | -\$75,094,299 | | -\$2,822,285 | \$0 | \$0 | \$0 | -\$77,916,584 | \$36,008,910 | \$615,442,144 |
| 01/01/2033 | 12/31/2033 | \$2,023,706 | \$4,470,744 | | -\$72,950,932 | | -\$2,850,595 | \$0 | \$0 | \$0 | -\$75,801,527 | \$34,004,945 | \$580,140,012 |
| 01/01/2034 | 12/31/2034 | \$2,003,472 | \$4,041,568 | | -\$70,736,875 | | -\$2,878,958 | \$0 | \$0 | \$0 | -\$73,615,833 | \$31,989,835 | \$544,559,054 |
| 01/01/2035 | 12/31/2035 | \$1,983,431 | \$3,788,339 | | -\$68,295,601 | | -\$2,907,634 | \$0 | \$0 | \$0 | -\$71,203,235 | \$29,970,035 | \$509,097,624 |
| 01/01/2036 | 12/31/2036 | \$1,963,604 | \$3,764,155 | | -\$65,707,651 | | -\$2,936,784 | \$0 | \$0 | \$0 | -\$68,644,435 | \$27,968,053 | \$474,149,001 |
| 01/01/2037 | 12/31/2037 | \$1,943,970 | \$3,767,690 | | -\$63,097,921 | | -\$2,966,607 | \$0 | \$0 | \$0 | -\$66,064,528 | \$25,997,484 | \$439,793,617 |
| 01/01/2038 | 12/31/2038 | \$1,924,530 | \$3,513,697 | | -\$60,338,470 | | -\$2,996,887 | \$0 | \$0 | \$0 | -\$63,335,357 | \$24,058,504 | \$405,954,991 |
| 01/01/2039 | 12/31/2039 | \$1,905,292 | \$3,168,556 | | -\$57,678,240 | | -\$3,027,941 | \$0 | \$0 | \$0 | -\$60,706,181 | \$22,144,248 | \$372,466,906 |
| 01/01/2040 | 12/31/2040 | \$1,886,237 | \$2,589,371 | | -\$54,954,954 | | -\$3,059,789 | \$0 | \$0 | \$0 | -\$58,014,743 | \$20,245,551 | \$339,173,322 |
| 01/01/2041 | 12/31/2041 | \$1,867,375 | \$1,523,955 | | -\$52,221,709 | | -\$3,093,411 | \$0 | \$0 | \$0 | -\$55,315,120 | \$18,344,454 | \$305,593,986 |
| 01/01/2042 | 12/31/2042 | \$1,848,695 | \$788,527 | | -\$49,489,264 | | -\$3,127,918 | \$0 | \$0 | \$0 | -\$52,617,182 | \$16,436,111 | \$272,050,137 |
| 01/01/2043 | 12/31/2043 | \$1,830,208 | \$467,349 | | -\$46,794,816 | | -\$3,163,450 | \$0 | \$0 | \$0 | -\$49,958,266 | \$14,540,670 | \$238,930,098 |
| 01/01/2044 | 12/31/2044 | \$1,811,914 | \$443,504 | | -\$44,064,783 | | -\$3,199,917 | \$0 | \$0 | \$0 | -\$47,264,700 | \$12,679,600 | \$206,600,416 |
| 01/01/2045 | 12/31/2045 | \$1,793,802 | \$392,945 | | -\$41,476,394 | | -\$3,237,701 | \$0 | \$0 | \$0 | -\$44,714,095 | \$10,859,878 | \$174,932,946 |
| 01/01/2046 | 12/31/2046 | \$1,775,872 | \$343,460 | | -\$38,915,721 | | -\$3,277,149 | \$0 | \$0 | \$0 | -\$42,192,870 | \$9,078,085 | \$143,937,493 |
| 01/01/2047 | 12/31/2047 | \$1,758,114 | \$295,152 | | -\$36,417,565 | | -\$3,277,581 | \$0 | \$0 | \$0 | -\$39,695,146 | \$7,334,966 | \$113,630,579 |
| 01/01/2048 | 12/31/2048 | \$1,740,538 | \$248,265 | | -\$34,073,508 | | -\$3,066,616 | \$0 | \$0 | \$0 | -\$37,140,124 | \$5,633,825 | \$84,113,083 |
| 01/01/2049 | 12/31/2049 | \$1,723,133 | \$203,093 | | -\$31,783,564 | | -\$2,860,521 | \$0 | \$0 | \$0 | -\$34,644,085 | \$3,977,219 | \$55,372,443 |
| 01/01/2050 | 12/31/2050 | \$1,705,900 | \$160,952 | | -\$29,578,378 | | -\$2,662,054 | \$0 | \$0 | \$0 | -\$32,240,432 | \$2,363,487 | \$27,362,350 |
| 01/01/2051 | 12/31/2051 | \$1,688,849 | \$122,790 | | -\$27,488,957 | | -\$2,474,006 | \$0 | \$0 | \$0 | -\$29,962,963 | \$788,974 | \$0 |

Version Updates

v20230727

| Version | Date updated |
|-----------|--------------|
| v20230727 | 07/27/2023 |

TEMPLATE 10

v20230727

Pre-2021 Zone Certification, Baseline Details, and Final SFA Assumption Summaries

File name: *Template 10 Plan Name*, where "Plan Name" is an abbreviated version of the plan name.

Provide a table identifying and summarizing which assumptions/methods were used in each of the pre-2021 certification of plan status, the Baseline details (Template 5A or Template 5B), and the final SFA calculation (Template 4A or Template 4B).

This table should identify all assumptions/methods used, including those that are reflected in the Baseline provided in Template 5A or Template 5B and any assumptions not explicitly listed. Please identify the source (file and page number) of the pre-2021 certification of plan status assumption. Additionally, please select the appropriate assumption change category per SFA assumption guidance*. Please complete all rows of Template 10. If an assumption on Template 10 does not apply to the application, please enter "N/A" and explain as necessary in the "comments" column. If the application contains assumptions not listed on Template 10, create additional rows as needed.

See the table below for a brief example of how to fill out the requested information in summary form. In the example the first row demonstrates how one would fill out the information for a change in the mortality assumption used in the pre-2021 certification of plan status, where the RP-2000 mortality table was the original assumption, and the plan proposes to change to the Pri-2012(BC) table.

| | (A) | (B) | (C) | (D) | (E) | | | | | | | | | | | | | | |
|---|-----------------------------------|--|---|--|---|-----|----|-----|----|-----|----|-----|----|-----|-----|------|----------------------------|------------------|-----------|
| | Source of (B) | Assumption/Method Used in Most Recent Certification of Plan Status Completed Prior to 1/1/2021 | Baseline Assumption/Method Used | Final SFA Assumption/Method Used | Category of assumption change from (B) to (D) per SFA Assumption Guidance | | | | | | | | | | | | | | |
| Base Mortality - Healthy | 2019 Company XYZ AVR.pdf p. 55 | RP-2000 mortality table | Pri-2012(BC) mortality table | Same as baseline | Acceptable Change | | | | | | | | | | | | | | |
| Contribution Base Units | 2020 Company XYZ ZC.pdf p. 19 | 125,000 hours projected to insolvency in 2024 | 125,000 hours projected through the SFA projection period in 2051 | 100,000 hours projected with 3.0% reductions annually for 10 years and 1.0% reductions annually thereafter | Generally Acceptable Change | | | | | | | | | | | | | | |
| Assumed Withdrawal Payments -Future Withdrawals | 2020 Company XYZ ZC.pdf p. 20 | None assumed until insolvency in 2024 | None assumed through the SFA projection period in 2051 | Same as baseline | Other Change | | | | | | | | | | | | | | |
| Retirement - Actives | 2019 Company XYZ AVR.pdf p. 54 | <table border="0"> <tr> <td>Age</td> <td>Actives</td> </tr> <tr> <td>55</td> <td>10%</td> </tr> <tr> <td>56</td> <td>20%</td> </tr> <tr> <td>57</td> <td>30%</td> </tr> <tr> <td>58</td> <td>40%</td> </tr> <tr> <td>59</td> <td>50%</td> </tr> <tr> <td>60+</td> <td>100%</td> </tr> </table> | Age | Actives | 55 | 10% | 56 | 20% | 57 | 30% | 58 | 40% | 59 | 50% | 60+ | 100% | Same as Pre-2021 Zone Cert | Same as baseline | No Change |
| Age | Actives | | | | | | | | | | | | | | | | | | |
| 55 | 10% | | | | | | | | | | | | | | | | | | |
| 56 | 20% | | | | | | | | | | | | | | | | | | |
| 57 | 30% | | | | | | | | | | | | | | | | | | |
| 58 | 40% | | | | | | | | | | | | | | | | | | |
| 59 | 50% | | | | | | | | | | | | | | | | | | |
| 60+ | 100% | | | | | | | | | | | | | | | | | | |

Add additional lines if needed.

*<https://www.pbgc.gov/sites/default/files/sfa/sfa-assumptions-guidance.pdf>

Template 10

v20230727

Pre-2021 Zone Certification, Baseline Details, and Final SFA Assumption Summaries

PLAN INFORMATION

| | |
|------------------------|------------|
| Abbreviated Plan Name: | NPP |
| EIN: | 13-6212879 |
| PN: | 001 |

| | (A) | (B) | (C) | (D) | (E) | |
|----------------------|--------------------------|--|---------------------------------|----------------------------------|---|----------|
| | Source of (B) | Assumption/Method Used in Most Recent Certification of Plan Status Completed Prior to 1/1/2021 | Baseline Assumption/Method Used | Final SFA Assumption/Method Used | Category of assumption change from (B) to (D) per SFA Assumption Guidance | Comments |
| SFA Measurement Date | N/A | N/A | 12/31/2022 | 12/31/2022 | N/A | |
| Census Data as of | 2020Zone20200330 NPP.pdf | 01/01/2019 | 01/01/2022 | 01/01/2022 | N/A | |

DEMOGRAPHIC ASSUMPTIONS

| | | | | | | |
|----------------------------------|--------------------------|--|----------------------------|------------------|-----------|--|
| Base Mortality - Healthy | 2020Zone20200330 NPP.pdf | RP-2014 Mortality Table with Blue Collar Adjustment | Same as Pre-2021 Zone Cert | Same as Baseline | No Change | |
| Mortality Improvement - Healthy | 2020Zone20200330 NPP.pdf | Full generational projection using Scale MP-2016 | Same as Pre-2021 Zone Cert | Same as Baseline | No Change | |
| Base Mortality - Disabled | 2020Zone20200330 NPP.pdf | RP-2014 Disabled Retiree Mortality Table | Same as Pre-2021 Zone Cert | Same as Baseline | No Change | |
| Mortality Improvement - Disabled | 2020Zone20200330 NPP.pdf | Full generational projection using Scale MP-2016 | Same as Pre-2021 Zone Cert | Same as Baseline | No Change | |
| Retirement - Actives | 2020Zone20200330 NPP.pdf | Age Rates 62 30% 63-64 15% 65-66 30% 67-68 25% 69-70 20% 71 75% 72+ 100% | Same as Pre-2021 Zone Cert | Same as Baseline | No Change | |
| Retirement - TVs | 2020Zone20200330 NPP.pdf | Age Rates 62 50% 63-64 25% 65 55% 66 25% 67-71 10% 72+ 100% | Same as Pre-2021 Zone Cert | Same as Baseline | No Change | |
| Turnover | 2020Zone20200330 NPP.pdf | Age Rates 20 11.91% 25 11.59% 30 10.83% 35 9.41% 40 7.73% 45 5.96% 50 3.84% 55 1.41% 60 0.14% | Same as Pre-2021 Zone Cert | Same as Baseline | No Change | |
| Disability | 2020Zone20200330 NPP.pdf | Age Rates 20 0.08% 25 0.08% 30 0.08% 35 0.09% 40 0.14% 45 0.27% 50 0.60% 55 1.28% 60 2.61% | Same as Pre-2021 Zone Cert | Same as Baseline | No Change | |

Template 10

v20230727

Pre-2021 Zone Certification, Baseline Details, and Final SFA Assumption Summaries

PLAN INFORMATION

| | |
|------------------------|------------|
| Abbreviated Plan Name: | NPP |
| EIN: | 13-6212879 |
| PN: | 001 |

| | (A) | (B) | (C) | (D) | (E) | |
|--|--|--|---|--|---|----------|
| | Source of (B) | Assumption/Method Used in Most Recent Certification of Plan Status Completed Prior to 1/1/2021 | Baseline Assumption/Method Used | Final SFA Assumption/Method Used | Category of assumption change from (B) to (D) per SFA Assumption Guidance | Comments |
| Optional Form Elections - Actives | 2020Zone20200330 NPP.pdf | 65% of the married population is assumed to elect the 100% joint and survivor form of payment. The remaining population is assumed to elect the life form of payment. | Same as Pre-2021 Zone Cert | Same as Baseline | No Change | |
| Optional Form Elections - TVs | 2020Zone20200330 NPP.pdf | 65% of the married population is assumed to elect the 100% joint and survivor form of payment. The remaining population is assumed to elect the life form of payment. | Same as Pre-2021 Zone Cert | Same as Baseline | No Change | |
| Marital Status | 2020Zone20200330 NPP.pdf | 65% assumed to be married | Same as Pre-2021 Zone Cert | Same as Baseline | No Change | |
| Spouse Age Difference | 2020Zone20200330 NPP.pdf | Females are 3 years younger than male spouses | Same as Pre-2021 Zone Cert | Same as Baseline | No Change | |
| Active Participant Count | 2020Zone20200330 NPP.pdf | 6% annual declines in membership | Same as Pre-2021 Zone Cert | 6% annual declines in membership through 2031, and 1% declines thereafter | Other Change | |
| New Entrant Profile | 2020Zone20200330 NPP.pdf | The benefits for new entrants (normal cost and projected benefit payments) follows a "stationary population" assumption which does not rely on a cohort of new entrants and assumes future new hires would not change the demographic profile (i.e., average age, service) of the current active membership. | Uses a cohort based projection based on historical new hire and re-hire data. Assume average annual contributions of \$2,188 per year and 65% male. | Same as Baseline | Acceptable Change | |
| Missing or Incomplete Data | 2020Zone20200330 NPP.pdf | There is no missing or incomplete data | Same as Pre-2021 Zone Cert | Same as Baseline | No Change | |
| "Missing" Terminated Vested Participant Assumption | 2020Zone20200330 NPP.pdf | 90% of TVs past their required beginning date are assumed deceased or will not collect a benefit | Same as Pre-2021 Zone Cert | TVs over age 85 as of the SFA measurement date are assumed to be deceased without a surviving spouse. | Acceptable Change | |
| Treatment of Participants Working Past Retirement Date | N/A | TVs are assumed to receive an actuarially increased benefit for late retirement from normal retirement date through their date of commencement. | Same as Pre-2021 Zone Cert | TVs are assumed to receive an actuarially increased benefit for late retirement through their RBD and an accumulated lump sum from their RBD until the date payments commence. | Other Change | |
| Assumptions Related to Reciprocity | 2020Zone20200330 NPP.pdf | None. | Same as Pre-2021 Zone Cert | Same as Baseline | No Change | |
| Other Demographic Assumption 1 | | | | | | |
| Other Demographic Assumption 2 | | | | | | |
| Other Demographic Assumption 3 | | | | | | |

NON-DEMOGRAPHIC ASSUMPTIONS

Template 10

v20230727

Pre-2021 Zone Certification, Baseline Details, and Final SFA Assumption Summaries

PLAN INFORMATION

| | |
|------------------------|------------|
| Abbreviated Plan Name: | NPP |
| EIN: | 13-6212879 |
| PN: | 001 |

| | (A) | (B) | (C) | (D) | (E) | |
|---|--|--|---|---|---|--|
| | Source of (B) | Assumption/Method Used in Most Recent Certification of Plan Status Completed Prior to 1/1/2021 | Baseline Assumption/Method Used | Final SFA Assumption/Method Used | Category of assumption change from (B) to (D) per SFA Assumption Guidance | Comments |
| Contribution Base Units | 2020Zone20200330 NPP.pdf | Future CBUs are assumed to decline 6% per year | Same as Pre-2021 Zone Cert | Future CBUs are assumed to decline 6% per year through 2031, and 1% declines thereafter | Other Change | |
| Contribution Rate | 2020Zone20200330 NPP.pdf | Future Contribution Rates are assumed to remain stable. | Same as Pre-2021 Zone Cert | Same as Baseline | No Change | |
| Administrative Expenses | 2020Zone20200330 NPP.pdf | \$2,465,159 payable at the beginning of the year for the plan year beginning January 1, 2019, growing annually by 2% | Same as Pre-2021 Zone Cert | \$2,543,007 for 2023 (recurring of \$2,407,177 and a one-time expense of \$135,830). Recurring expenses increase at 2.5% per year. PBGC premiums are separately projected and reflect the \$52 flate rate premium for 2032. Total expenses limited to 9% of benefit payments. | Other Change | |
| Assumed Withdrawal Payments - Currently Withdrawn Employers | 2020Zone20200330 NPP.pdf | 100% collectability on already withdrawn employers, but 0% for bankrupt employers. | Same as Pre-2021 Zone Cert | 81% collectability on already withdrawn employers, but 0% for bankrupt employers. | Other Change | |
| Assumed Withdrawal Payments -Future Withdrawals | 2020Zone20200330 NPP.pdf | We assume no instances of complete or partial withdrawals in the future. | Same as Pre-2021 Zone Cert | We assume 22.8% of the annual decline in CBUs will trigger future withdrawal liability, payable over 20-years, and will be 81% collectible. | Other Change | |
| Other Assumption 1 | N/A | N/A | As a result of the Plan's VCP filing, it was assumed that \$40,138,014, which reflects missed pension payments with interest, would be paid on January 1, 2024. | Same as Baseline | Other Change | The Plan filed a Voluntary Correction Program ("VCP") application with the IRS on April 13, 2023 to correct a significant operational failure with respect to suspension of benefits notices and actuarial adjustments for late retirement benefit calculations. |
| Other Assumption 2 | | | | | | |
| Other Assumption 3 | | | | | | |

CASH FLOW TIMING ASSUMPTIONS

| | | | | | | |
|-------------------------------|--|--|----------------------------|--|--------------|--|
| Benefit Payment Timing | | Middle of year | Same as Pre-2021 Zone Cert | Same as Baseline | No Change | |
| Contribution Timing | | Middle of year | Same as Pre-2021 Zone Cert | Same as Baseline | No Change | |
| Withdrawal Payment Timing | | Actual for known withdrawals (partial or complete) | Same as Pre-2021 Zone Cert | Actual for known withdrawals (partial or complete) and middle of year for future assumed withdrawals | Other Change | |
| Administrative Expense Timing | | Beginning of year | Same as Pre-2021 Zone Cert | Same as Baseline | No Change | |
| Other Payment Timing | | Middle of year | Same as Pre-2021 Zone Cert | Same as Baseline | No Change | |

Create additional rows as needed.