

NUAI TCDC v2.7.1

What was corrected | October 12, 2026

We corrected one spreadsheet reference in the Phase 1 financing check. It had been reading Phase 2's debt-payment coverage instead of Phase 1's. Each phase must meet its own borrowing requirements.

The selected illustration stays the same

Phase 1's correct minimum coverage is approximately 1.959x, compared with the 1.965x previously displayed. Both exceed the selected 1.10x requirement, so the selected conditional value remains \$6.682 per original share. Projected cash flows and financing assumptions are unchanged.

The correction matters when a user tightens Phase 1's covenant. At an illustrative 1.962x requirement, the original spreadsheet could incorrectly label the package feasible. The corrected check fails because Phase 1's own coverage is insufficient. "No feasible funded value" means that financing package fails the model's requirements; it is not a zero-dollar stock-price prediction.

Actual financing remains unverified

The model still has no verified complete executed financing package. Its selected illustration depends on uncommitted future investor contributions, debt repayment, leases, power delivery and legal permissions. The \$6.682 result is a conditional scenario value, not a current market quotation or stock-price target.

Checks and remaining limits

We verified the one-cell change, replayed eight saved financial-engine cases and passed eight focused spreadsheet-formula regressions. We did not recalculate the entire corrected workbook in Excel, LibreOffice or ArtifactTool. The original report's broader workbook checks concern the original v2.7 file.

The v2.7.1 label identifies this correction release. Internal workbook labels and the following three original research pages are preserved. Their earlier "unpublished" statements describe preparation status; publication of this correction package was subsequently authorized. This document does not certify a completed deployment.

This is not a research update. The model retains its October 8, 2026 valuation date and source assumptions; it does not provide current cash, debt or share balances. The original October 11 end-of-day research-cutoff wording is not newly certified, and later company-filing coverage remains incomplete. All original qualifications continue to apply.

What v2.7 says about NUI

Who funds the project, who gets the tax benefit, and what is left for existing shareholders

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Direct leasing can change the business arrangement. It does not make a multibillion-dollar project free to build.

NUI can pursue a tenant directly while still needing lenders, preferred capital and outside equity. Those investors supply money and receive their own repayments and profit claims. Keeping more of the project requires funding the share that outside investors no longer cover.

Case	Conditional value per original share
Original v2.6 selected	\$2.415
Direct leasing with old debt and tax method	\$2.411
Same C contract with current-law taxes	No feasible funded value
Selected redesigned financing package	\$6.682
Selected Phase 1-only package	No feasible funded value

"No feasible funded value" means the proposed package fails at least one financing, investor-return or cash test. It is not a prediction that the stock is worth zero. A number shown here is also not a current stock-price target.

The failed P1 selection applies to the principal 6%/7% coupon grid. A separate 4% borrowing-rate illustration passes conditionally; availability of that loan is not established.

The biggest condition

The model found 0 packages that pass the executed-capital evidence gate. Financially feasible illustrations still depend on leases, capital, services, power delivery and legal permissions that are not established.

Why the old 80% cannot simply be deleted

The old model's 80% outside-common allocation represented investor economics and funding, not an identified 80% gift to Stream. The recovered engine has no separate named Stream ownership percentage. V2.7 re-prices the needed financial participation and keeps replacement services visible.

Tax savings are useful only when usable

A deduction reduces taxable income. It is not cash from the government and cannot pay a construction invoice by itself. A loss can remain suspended or carried forward until the right taxpayer has enough basis, taxable income and legal ability to use it.

Question	What the model does
Is setting aside cash a tax deduction?	No. The capital maintenance reserve still reduces available cash. Tax relief and asset basis require an eligible expense or actual asset spending; the model does not invent spending or release the reserve.
Can the whole campus be written off immediately?	No. The principal case has no verified short-life allocation. Building structure is not automatically bonus-eligible. Separate 10%, 30% and 50% assumptions show how documented classification could matter.
Does NUA1 get the generator's tax savings?	Not automatically. The independent power company owns its own economics. A lower tenant power bill or payment to NUA1 needs a separate contractual route.
Is the borrower taxed twice?	No automatic duplicate federal corporate tax. The principal structure tests a pass-through borrower and calculates NUA1's owner taxes separately. Texas tax is a distinct cash item.
Is every improvement caused by the bill?	No. Correcting old tax methods is measured first under pre-bill law. Only the matched current-law difference is attributed to the legal change.

Keeping a larger project share still costs money

The selected current-law illustration has P1 NUA1 retention 40.0%; P2 NUA1 retention 40.0%. It raises \$86.9m gross at the parent and issues 43.44 million new shares. These are assumed transactions, not an announced or completed funding plan.

Cash funding differs from ownership: P1 outside investors supply 93.03% of common cash for 55.0% ownership; P2 outside investors supply 100.00% of common cash for 60.0% ownership. These assumed sponsor carry terms pass modeled return tests but remain unnegotiated and uncommitted.

Project ownership and public-company dilution are different. A shareholder can retain a larger percentage of project profits while owning a smaller fraction of NUA1 after new shares are sold. The model follows cash to the original share cohort rather than maximizing a headline ownership percentage.

The future funding bill matters

The highest conditional E illustration needs \$5,449.5m of outside common after construction and has \$5,831.4m in senior balloon repayments. Those future calls are assumed, not committed. The model prices a return on money actually drawn but has no separately evidenced fee for keeping that undrawn funding available.

What could change the conclusion

The financing comparison tests cheaper coupons, full amortization, repayment shaped to available cash and a large final maturity payment. Every option still has to fund the full project, cover its bills and pay its investors. A lower rate is not automatically the best package if repayment becomes much faster or reserves become larger.

Required shareholder return	Same-distribution model value
11%	\$6.682
13%	\$5.171
15%	\$4.050

These are identical distributions discounted at different returns. They do not prove a risk rating or show that borrowing at 6% creates a safe gain. Refusal of the future common calls or balloon takeout removes the funded value; no new refinancing is assumed to appear.

Evidence that would matter most

- A signed tenant lease with enforceable rent, dates and credit support.
- Actual project and parent financing, including who must fund later calls.
- Current unrestricted cash, Macquarie payoff terms and collateral permissions.
- A clear ownership/tax chart and supportable asset tax-basis records.
- A funded power-delivery plan and priced completion/service obligations.

A package that works only after assuming unavailable capital remains unfunded. A tax benefit belonging to another taxpayer is not NUA cash.

This is a finite search of 805 cases, not proof of the best possible financing in the market. Original v2.6 files are preserved. The workbook, review memo and reproducibility bundle show assumptions, rejected cases and verification limits.

Primary evidence: NUA SEC filings dated October 8, September 21 and September 24, 2026; original April 8 loan agreement; FY2025 tax note; Public Law 119-21 and the IRS/Texas sources listed in the review memo.