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Effects of the New Revenue Standard: Observations From a Review of First-Quarter 2018 Public Filings by Power and Utilities Companies

The Bottom Line

- For most filers that we reviewed in the power and utilities (P&U) industry, the new and comprehensive disclosure requirements were the most significant change that resulted from the adoption of ASC 606.¹
- We observed diversity in the type and amount of information entities disclosed.
- Most of the filers reviewed chose to add a separate and specific revenue footnote that contains the required disclosures.
- When providing disaggregated revenue disclosures, most filers reviewed used three or fewer categories. The most commonly selected categories were (1) product line (electric, gas, etc.) and (2) type of customer (residential, commercial, industrial, etc.).
- The most common practical expedient chosen by P&U adopters was the invoicing practical expedient.
- Many filers separately disclosed alternative revenue programs and their associated policies.
- To the extent that the accounting standard setters clarify guidance and regulators issue more comments, we expect entities to continue to refine the information they disclose.

¹ FASB Accounting Standards Codification Topic 606, *Revenue From Contracts With Customers*.

Beyond the Bottom Line

This *Power and Utilities Spotlight* provides insight into our review of the disclosures in the public filings of a group of companies that adopted the FASB's new revenue standard (ASC 606) in the first quarter of 2018.² For a comprehensive discussion of the new standard, see Deloitte's [A Roadmap to Applying the New Revenue Recognition Standard](#).

Background

As a result of the recognition and measurement guidance in ASC 606, some P&U companies have made changes to their financial statements. For many, the effect of the new requirements has not been significant. However, all P&U entities have needed to carefully consider the standard's new and modified quantitative and qualitative disclosure guidance, which has significantly increased the amount of information that companies must disclose about revenue activities and related transactions.

As P&U entities adopting the standard in 2018 continue to refine their disclosures, they may benefit from evaluating the disclosure trends we have observed through our review.

Interim Versus Annual Reporting Considerations

The new revenue standard requires entities to disclose information on both an interim and annual basis. The disclosures discussed in this Spotlight are all related to interim financial statements.

Even though the new revenue standard specifies that certain disclosures are not required in interim financial statements, SEC registrants must provide both annual and interim disclosures in the first interim period after adopting any new accounting standard and in each subsequent quarter in the year of adoption.³ Specifically, [Section 1500](#) of the SEC Financial Reporting Manual states:

Article 10 requires disclosures about material matters that were not disclosed in the most recent annual financial statements. Accordingly, when a registrant adopts a new accounting standard in an interim period, the registrant is expected to provide both the annual and the interim period financial statement disclosures prescribed by the new accounting standard, to the extent not duplicative. These disclosures should be included in each quarterly report in the year of adoption.

Thus, SEC registrants must comply with the new revenue standard's annual and interim disclosure requirements in each quarter of their first year of adoption to the extent that the information they provide is material and not already disclosed elsewhere in the financial statements.

Description of Population

The discussion in this Spotlight is based primarily on the quarterly Form 10-Q filings of 23 P&U companies that adopted the new revenue standard in the first quarter of 2018. Of the sample, three entities had only nonregulated operations.

Key — Disclosure Categories

- Required for all entities.
 - Only required for public entities (nonpublic entities can elect to not disclose).
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² Public business entities reporting under U.S. GAAP are required to adopt the new revenue standard for annual reporting periods (including interim reporting periods within those annual periods) beginning after December 15, 2017. Early adoption is permitted as of reporting periods (including interim periods) beginning after December 15, 2016. For nonpublic entities, the new revenue standard is effective for annual periods beginning after December 15, 2018, and early adoption is also permitted. For additional discussion of companies' disclosures about implementation of the new standard, see Deloitte's November 21, 2017, [Heads Up](#).

³ In the second year after adoption, entities may exclude annual disclosures from their interim financial statements.

The discussion below summarizes several key categories of disclosures required under the new revenue standard and identifies trends related to the P&U entities that were analyzed.

Review of Public Disclosure Filings

Adoption of the New Revenue Standard

Disclosure Requirements

When transitioning to the new revenue standard, an entity can elect to use either the full retrospective method under ASC 606-10-65-1(d)(1) or the modified retrospective method under ASC 606-10-65-1(d)(2). Below is an outline of the disclosure requirements for the transition under each method.

Full Retrospective Method

Under ASC 606-10-65-1(e), as amended by [ASU 2016-12](#),⁴ an entity that elects to use the full retrospective method is required to disclose information about a change in accounting principle upon initial adoption of the new revenue standard in accordance with the guidance in ASC 250-10-50-1 and 50-2⁵ as follows:

- “The nature of and reason for the change in accounting principle, including an explanation of why the newly adopted accounting principle is preferable.”
- “The method of applying the change, including all of the following:
 1. A description of the prior-period information that has been retrospectively adjusted, if any.
 2. The effect of the change on income from continuing operations, net income (or other appropriate captions of changes in the applicable net assets or performance indicator), any other affected financial statement line item, and any affected per-share amounts for . . . any prior periods retrospectively adjusted. Presentation of the effect on financial statement subtotals and totals other than income from continuing operations and net income (or other appropriate captions of changes in the applicable net assets or performance indicator) is not required.
 3. The cumulative effect of the change on retained earnings or other components of equity or net assets in the statement of financial position as of the beginning of the earliest period presented.
 4. If retrospective application to all prior periods is impracticable, disclosure of the reasons therefore, and a description of the alternative method used to report the change (see paragraphs 250-10-45-5 through 45-7).”
- “If indirect effects of a change in accounting principle are recognized both of the following shall be disclosed:
 1. A description of the indirect effects of a change in accounting principle, including the amounts that have been recognized in the current period, and the related per-share amounts, if applicable
 2. Unless impracticable, the amount of the total recognized indirect effects of the accounting change and the related per-share amounts, if applicable, that are attributable to each prior period presented. Compliance with this disclosure requirement is practicable unless an entity cannot comply with it after making every reasonable effort to do so.”

⁴ FASB Accounting Standards Update No. 2016-12, *Narrow-Scope Improvements and Practical Expedients*.

⁵ FASB Accounting Standards Codification Topic 250, *Accounting Changes and Error Corrections*.

- “Financial statements of subsequent periods need not repeat the disclosures required by this paragraph. If a change in accounting principle has no material effect in the period of change but is reasonably certain to have a material effect in later periods, the disclosures required by (a) shall be provided whenever the financial statements of the period of change are presented.”
- “An entity that issues interim financial statements shall provide the required disclosures in the financial statements of both the interim period of the change and the annual period of the change.”

Modified Retrospective Method

Under ASC 606-10-65-1(h), as amended by ASU 2016-12, an entity that elects to use the modified retrospective method is required to disclose the following information:

- “[T]he entity shall recognize the cumulative effect of initially applying the [new revenue standard] as an adjustment to the opening balance of retained earnings (or other appropriate components of equity or net assets in the statement of financial position) of the annual reporting period that includes the date of initial application.”
- “Under this transition method, an entity may elect to apply this guidance retrospectively either to all contracts at the date of initial application or only to contracts that are not completed contracts at the date of initial application An entity shall disclose whether it has applied this guidance to all contracts at the date of initial application or only to contracts that are not completed at the date of initial application.”
- “Under this transition method, an entity may apply the practical expedient for contract modifications in (f)(4). If an entity applies the practical expedient for contract modifications in (f)(4), it shall comply with the guidance in (g).”

Insights From First-Quarter Adopters

Of the P&U filers reviewed, less than 15 percent used the full retrospective adoption method. Further, roughly 80 percent disclosed that there was either no adjustment to equity or that the adjustment was not material as a result of adoption of the new revenue standard.

Disaggregation of Revenue

Disclosure Requirements

In accordance with ASC 606-10-50-5 and 50-6, an entity is required to disaggregate revenue into categories as follows:

- The categories must “depict how the nature, amount, timing, and uncertainty of revenue and cash flows are affected by economic factors.”
- The disclosures must contain sufficient information to convey the relationship between disaggregated revenue and each disclosed segment’s revenue information.

A nonpublic entity may elect not to apply the two requirements above; however, in accordance with ASC 606-10-50-7, it must still disclose, “at a minimum, revenue disaggregated according to the timing of transfer of goods or services (for example, revenue from goods or services transferred to customers at a point in time and revenue from goods or services transferred to customers over time) and qualitative information about how economic factors . . . affect the nature, amount, timing, and uncertainty of revenue and cash flows.”

As discussed in paragraph BC336 of [ASU 2014-09](#),⁶ “because the most useful disaggregation of revenue depends on various entity-specific or industry-specific factors, the Boards decided that Topic 606 should not prescribe any specific factor to be used as the basis for disaggregating revenue from contracts with customers.” Instead, ASC 606-10-55-91 provides examples of categories that may be appropriate for an entity’s disclosures in the financial statements.

When selecting the types of categories for disaggregated revenue, an entity should consider how and where it has communicated information about revenue for various purposes, including (1) disclosures outside the financial statements, (2) information regularly reviewed by the chief operating decision maker when evaluating the financial performance of operating segments, and (3) other information that is similar to the types of information identified in (1) and (2) and that is used by the entity or users of its financial statements for evaluating its financial performance or making decisions about resource allocation.

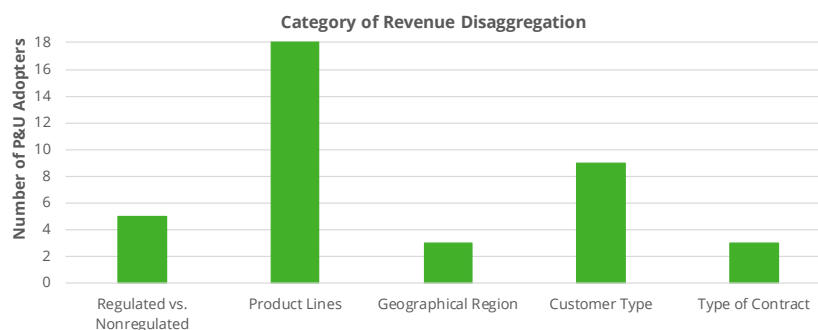
Insights From First-Quarter Adopters

Over 80 percent of the P&U adopters we analyzed used a tabular format to disclose disaggregated revenue by category. However, very few used that format to disclose information about the timing of transfers; instead, they often presented it in narrative form as part of the description of each revenue stream.

Further, roughly 80 percent of the P&U adopters disclosed disaggregated revenue by category in a newly incorporated revenue footnote, 15 percent disclosed that information in the segment footnote (which eliminates duplicate information), and the remainder disclosed it as part of their footnote for newly adopted accounting pronouncements. Regardless of the location of the disclosures in the financial statements, the disaggregation of revenue provided by adopters was significantly more granular than the information that companies disclosed in footnotes before adopting the new standard.

ASC 606 provides an illustrative example⁷ of a disaggregated revenue disclosure along with the related illustrative segment disclosures that includes a reconciliation of disaggregated revenue to the segment disclosures. At the November 7, 2016, meeting of the FASB’s transition resource group (TRG) for revenue recognition, the FASB staff clarified that although a tabular reconciliation is not required under ASC 606-10-50-6, entities should disclose enough information to permit a financial statement user to understand the relationship between disaggregated revenue and the revenue disclosed by the reportable segment.

The chart below depicts the categories used for disaggregated revenue in the adopters’ disclosures:



⁶ FASB Accounting Standards Update No. 2014-09, *Revenue From Contracts With Customers (Topic 606)*.

⁷ ASC 606-10-55-295 through 55-297.

As the chart illustrates, the most common categories of disaggregation used by P&U adopters were product lines and customer type. In addition, a variety of other categories were used to depict the nature, amount, and uncertainty of revenue recognition.

We also analyzed how many different disaggregation categories each adopter considered relevant. Most (approximately 85 percent) appeared to use three or fewer categories of disaggregation, with just over 50 percent using only two categories, whereas approximately 15 percent used four or more categories.

Contract Balances

Disclosure Requirements

Under the new revenue standard, companies must disclose the following information about contract balances:⁸

- The opening and closing balances (receivables, contract assets, and contract liabilities), if they are not separately presented or disclosed elsewhere.
- The amount of revenue recognized in the reporting period from the beginning contract liability balance.
- An explanation of any significant changes in contract balances during the reporting period (by using quantitative and qualitative information).
- An explanation of “how the timing of satisfaction of its performance obligations . . . relates to the typical timing of payment . . . and the effect that those factors have on the contract asset and the contract liability balances” (in accordance with ASC 606-10-50-9).

Because the new revenue standard does not prescribe a specific format for disclosures about contract balances, entities can present them in tabular or narrative form. At the FASB's November 7, 2016, TRG meeting, the Board discussed whether a rollforward of contract balances should be included in the disclosures. Although such a rollforward is not required under ASC 606-10-50-8, the FASB staff noted that it may be an effective means of helping users understand the nature, amount, timing, and uncertainty of revenue and cash flows arising from contracts with customers, which is consistent with the overall objective of the new revenue standard.

Insights From First-Quarter Adopters

There was diversity in how adopters chose to meet the contract balance disclosure requirements. We observed that companies with significant contract balances (approximately 25 percent) tended to use a tabular format for the disclosures. Of those that disclosed the contract balances in a tabular format, approximately one-third included a rollforward. In rare instances, they used a separate footnote for the contract balance disclosures.

⁸ See [Sections 13.2](#) and [13.3](#) of Deloitte's [A Roadmap to Applying the New Revenue Recognition Standard](#) for more information about contract liabilities and contract assets, respectively.

Performance Obligations

Disclosure Requirements

The new revenue standard introduces various quantitative and qualitative requirements related to performance obligations. Under ASC 606-10-50-12, an entity must disclose the following:

- “When the entity typically satisfies its performance obligations (for example, upon shipment, upon delivery, as services are rendered, or upon completion of service) including when performance obligations are satisfied in a bill-and-hold arrangement.”
- “The significant payment terms (for example, when payment typically is due, whether the contract has a significant financing component, whether the consideration amount is variable, and whether the estimate of variable consideration is typically constrained in accordance with paragraphs 606-10-32-11 through 32-13).”
- “The nature of the goods or services that the entity has promised to transfer, highlighting any performance obligations to arrange for another party to transfer goods or services (that is, if the entity is acting as an agent).”
- “Obligations for returns, refunds, and other similar obligations.”
- “Types of warranties and related obligations.”

In addition, under ASC 606-10-50-12A, an entity must disclose:⁹

- “[R]evenue recognized in the reporting period from performance obligations satisfied (or partially satisfied) in previous periods (for example, changes in transaction price).”

Insights From First-Quarter Adopters

Given the unique nature of a company's goods and services and the many significant judgments it needs to make in applying the new standard, an entity's disclosures about performance obligations may be the most detailed and time-consuming disclosures to prepare. Each company we observed tailored its disclosures and the type of information it disclosed. In addition, a narrative (rather than tabular) format was most commonly used for these disclosures.

Remaining Performance Obligations

Disclosure Requirements

ASC 606-10-50-13 requires an entity to disclose the following about its remaining performance obligations:

- “The aggregate amount of the transaction price allocated to the performance obligations that are unsatisfied (or partially unsatisfied) as of the end of the reporting period.”
- “An explanation of when the entity expects to recognize as revenue the amount disclosed in accordance with [the above requirement], which the entity shall disclose in either of the following ways:
 1. On a quantitative basis using the time bands that would be most appropriate for the duration of the remaining performance obligations
 2. By using qualitative information.”

⁹ If a nonpublic entity elects under ASC 606-10-50-11 to omit the information in ASC 606-10-50-12A, the entity must instead provide the disclosure required by ASC 606-10-50-8(a) related to contract balances.

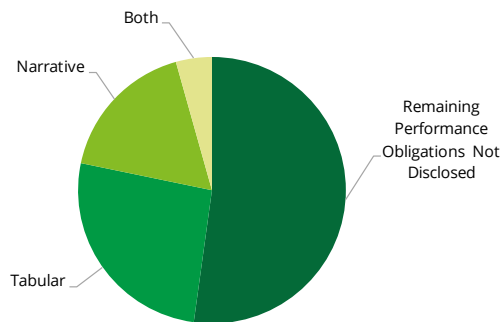
Optional Exemptions Related to Remaining Performance Obligations

There are several optional exemptions that can reduce or eliminate the requirement for the disclosure of remaining performance obligations (see discussion of these optional exemptions below).

Insights From First-Quarter Adopters

As illustrated in the pie chart below, more than half of the adopters did not provide disclosures on their remaining performance obligations. There are various reasons why entities may not disclose these obligations in a filing (e.g., they may have elected one or more optional exemptions). Of the adopters that did provide these disclosures, approximately one-third indicated that they used one or more optional exemptions. While there was diversity in the format they chose to use, most used a tabular presentation.

Remaining Performance Obligation Disclosure Format



Significant Judgments and Changes in Judgments

Disclosure Requirements

There are many significant judgments and estimates that entities must make and disclose when they adopt the new revenue standard. ASC 606-10-50-17 through 50-20 state the following:

- “An entity shall disclose the judgments, and changes in the judgments, made in applying the guidance in this Topic that significantly affect the determination of the amount and timing of revenue from contracts with customers. In particular, an entity shall explain the judgments, and changes in the judgments, used in determining both of the following:
 - a. The timing of satisfaction of performance obligations (see paragraphs 606-10-50-18 through 50-19) ●
 - b. The transaction price and the amounts allocated to performance obligations (see paragraph 606-10-50-20).” ●
- “For performance obligations that an entity satisfies over time, an entity shall disclose both of the following:
 - a. The methods used to recognize revenue (for example, a description of the output methods or input methods used and how those methods are applied) ●
 - b. An explanation of why the methods used provide a faithful depiction of the transfer of goods or services.” ■

- “For performance obligations satisfied at a point in time, an entity shall disclose the significant judgments made in evaluating when a customer obtains control of promised goods or services.” ■
- “An entity shall disclose information about the methods, inputs, and assumptions used for all of the following:
 - a. Determining the transaction price, which includes, but is not limited to, estimating variable consideration, adjusting the consideration for the effects of the time value of money, and measuring noncash consideration ■
 - b. Assessing whether an estimate of variable consideration is constrained ●
 - c. Allocating the transaction price, including estimating standalone selling prices of promised goods or services and allocating discounts and variable consideration to a specific part of the contract (if applicable) ■
 - d. Measuring obligations for returns, refunds, and other similar obligations.” ■

Insights From First-Quarter Adopters

We observed that many first-quarter adopters included these disclosures as part of the revenue footnote. In addition, because of the unique nature of the goods and services that these companies provide as well as the significant judgments they must make in applying the new standard, the entities’ disclosures were tailored and were not always consistent throughout the industry. Along with explaining the timing of revenue recognition, the disclosures must outline the various assumptions that entities used to support this judgment.

Contract Costs

Disclosure Requirements

Under the new revenue standard and in accordance with ASC 340-40,¹⁰ entities capitalize certain costs associated with obtaining and fulfilling a revenue contract.¹¹ These costs are subsequently amortized on a systematic basis that is consistent with the transfer to the customer of the goods or services to which the asset relates. Entities are required to disclose the following related to contract costs:

- The judgments used to determine the amount of costs incurred to obtain and fulfill a contract.
- The method used to determine amortization for each reporting period.
- The closing balances of assets recognized from the costs incurred to obtain or fulfill a contract, by asset category.
- The amortization and impairment loss recognized in the reporting period.

Practical Expedient Related to Contract Costs

As a practical expedient, an entity may recognize the incremental costs of obtaining a contract as an expense when incurred if the amortization period of the asset that the entity otherwise would have recognized is one year or less (see discussion of these practical expedients [below](#)).

¹⁰ FASB Accounting Standards Codification Topic 340, *Other Assets and Deferred Costs*.

¹¹ Entities may elect to use the practical expedient in ASC 340-40-25-4, which permits them to expense incremental costs related to obtaining or fulfilling a contract if such costs will be amortized over less than one year (see [Practical Expedients](#) for more information). The early adopters in our study used this practical expedient most often in connection with sales commission expenses.

Insights From First-Quarter Adopters

For P&U entities, disclosures about contract costs generally apply only to companies that incur significant costs to acquire or fulfill revenue contracts (if such costs are not in the scope of other applicable GAAP). We would generally not expect to see contract costs for an entity's regulated operations. Approximately 75 percent of the P&U adopters we reviewed did not disclose significant costs incurred to obtain or fulfill revenue contracts (these entities did not include disclosures related to contract costs) while 25 percent did have material contract costs and provided the required disclosures. Of the entities that did disclose contract costs, approximately 50 percent elected to use the practical expedient described below related to incremental costs to obtain a contract.

Practical Expedients

Disclosure Requirements

As previously noted, entities can elect to use a number of practical expedients as part of their adoption of the new revenue standard. Many of the expedients are from ASU 2014-09, and others were added in subsequent ASUs, including [ASU 2016-10](#),¹² ASU 2016-12, and [ASU 2016-20](#).¹³

Entities are generally required to disclose and explain the practical expedients they used under the new revenue guidance. Although the standard does not dictate where they should present these disclosures, entities typically included them in their "Significant Accounting Policies" disclosure or in the revenue footnote.

The following practical expedients were disclosed by the P&U adopters we reviewed and are listed in order of their frequency of use:

- *Determining when to recognize revenue* — If an entity has a right to consideration from a customer in an amount that corresponds directly with the value to the customer of the entity's performance completed to date (e.g., a service contract in which an entity bills a fixed amount for each hour of service provided), the entity may recognize revenue in the amount to which the entity has a right to invoice.
- *Remaining performance obligations*:
 - If the original expected duration of the contract is one year or less, the remaining performance obligation disclosure requirements in ASC 606-10-50-13 do not need to be disclosed.
 - If consideration is variable and revenue from the satisfaction of the performance obligation is recognized in the amount invoiced (ASC 606-10-55-18), the remaining performance obligation disclosure requirements in ASC 606-10-50-13 do not need to be disclosed.
 - In accordance with ASC 606-10-50-14A, "[a]n entity need not disclose the information in paragraph 606-10-50-13 for variable consideration for which either of the following conditions is met:
 - a. The variable consideration is a sales-based or usage-based royalty promised in exchange for a license of intellectual property accounted for in accordance with paragraphs 606-10-55-65 through 55-65B.

¹² FASB Accounting Standards Update No. 2016-10, *Identifying Performance Obligations and Licensing*.

¹³ FASB Accounting Standards Update No. 2016-20, *Technical Corrections and Improvements to Topic 606, Revenue From Contracts With Customers*.

- b. The variable consideration is allocated entirely to a wholly unsatisfied performance obligation or to a wholly unsatisfied promise to transfer a distinct good or service that forms part of a single performance obligation in accordance with paragraph 606-10-25-14(b), for which the criteria in paragraph 606-10-32-40 have been met.”
 - As indicated in ASC 606-10-65-1(f)(3), if the full retrospective transition method is adopted, “an entity need not disclose the amount of the transaction price allocated to the remaining performance obligations” for the reporting periods presented before the date of initial adoption.
- *Contract costs* — Incremental costs related to obtaining a contract may be expensed if they will be amortized over less than one year.
- *Determining the transaction price:*
 - An entity may exclude certain taxes from the transaction price (e.g., sales, use, value added, and some excise taxes). This practical expedient does not apply to taxes on an entity’s total gross receipts or those imposed during the inventory process.
 - In accordance with ASC 606-10-32-18, “an entity need not adjust the promised amount of consideration for the effects of a significant financing component if the entity expects, at contract inception, that the period between when the entity transfers a promised good or service to a customer and when the customer pays for that good or service will be one year or less.”
- *Transition* — Entities that use the modified retrospective transition method may apply the new guidance only to contracts that are not completed as of the date of initial application (i.e., not to all revenue contracts).

Insights From First-Quarter Adopters

Most entities used one or more practical expedients (depending on the facts and circumstances). The most common practical expedients used were those related to when to recognize revenue and disclosures about remaining performance obligations.

The following excerpts from the disclosures we reviewed illustrate how entities have disclosed management’s election of practical expedients under the new revenue standard:

- “We do not disclose the value of unsatisfied performance obligations for (i) contracts with an original expected length of one year or less and (ii) contracts for which we recognize revenue at the amount to which we have the right to invoice for services performed.”
- “Accordingly, the Company applies the practical expedient in paragraph 606-10-55-18 to its contracts and does not disclose information about variable consideration from remaining performance obligations for which the Company recognizes revenue.”

Alternative Revenue Programs

Disclosure Requirements

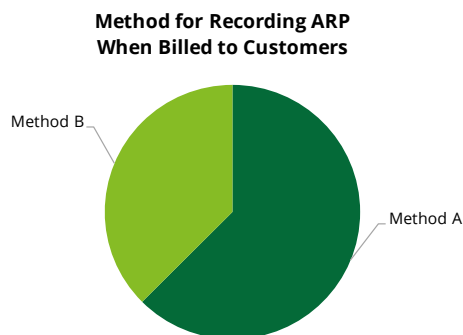
The FASB amended the revenue guidance to exclude alternative revenue programs (ARPs hereafter) from ASC 606 because such programs represent contracts between a utility and its regulators, not customers. The FASB also amended ASC 980-605-45-1 to require ARP revenues to be presented separately from revenue arising from contracts with customers in the statement of comprehensive income.

In addition, [Chapter 15](#) of the AICPA Audit and Accounting Guide *Revenue Recognition* (the “AICPA Guide”) addresses the income statement presentation of ARPs when revenues from such programs are billed to customers. It presents two alternatives — Method A and Method B. Under Method A, revenue from contracts with customers is recorded on the basis of “the total tariff price at the time [the] utility service is rendered, including amounts representing the billing of previously recognized ARP revenues.” Under Method B, the measurement of revenue from contracts with customers excludes “the portion of the ARP revenues that had been initially recorded in prior periods.” The AICPA’s Financial Reporting Executive Committee concluded that both methods are acceptable and that the method used to comply with this requirement is an accounting policy election that should be adopted and applied on a consistent basis and disclosed if material.

Insights From First-Quarter Adopters

Of the entities reviewed, approximately half separately disclosed ARP revenue balances. Among those that disclosed the alternative revenue balance, we determined the following:

- Approximately 80 percent included the disclosure within their footnotes while the remaining 20 percent disclosed the balance in the income statement.
- A quarter disclosed their policy for recording ARPs when they are billed to customers.
- The majority of the companies that did disclose their policy are following Method A, as outlined in the AICPA Guide.



Connecting the Dots

The adoption of the new revenue standard has led to a noticeable increase in the amount and type of information entities have disclosed about revenue activities and related transactions. Although we observed some consistency in their disclosures, companies’ interpretations of the requirements and the amount of information to disclose have varied. However, we expect diversity in practice to lessen as more entities adopt the standard and as entities evaluate their peers’ filings. Further, as accounting standard setters clarify guidance and regulators issue more comments, entities will continue to refine the information they disclose.

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