# Attachment E

# Summary of Financial Impact

# SUMMARY OF FINANCIAL IMPACT OF THE PROPOSED SUMMIT TEXAS CLEAN ENERGY, LLC PROJECT ON THE FINANCES OF THE ECTOR COUNTY INDEPENDENT SCHOOL DISTRICT UNDER A REQUESTED CHAPTER 313 PROPERTY VALUE LIMITATION

**July 12, 2013** | **Final Report**

**PREPARED BY**

# Estimated Impact of the Proposed Summit Texas Clean Energy, LLC Project on the Finances of the Ector County Independent School District under a Requested Chapter 313 Property Value Limitation

## Introduction

Summit Texas Clean Energy, LLC (Summit Texas) has requested that the Ector County Independent School District (ECISD) consider granting a property value limitation under Chapter 313 of the Tax Code, also known as the Texas Economic Development Act. In an application submitted to ECISD on June 18, 2013, Summit Texas proposes to invest $2.8 billion to construct a new integrated gasification combined cycle fertilizer and electric power plant in ECISD.

The Summit Texas project is consistent with the state's goal to "encourage large scale capital investments in this state." When enacted as House Bill 1200 in 2001, Chapter 313 of the Tax Code granted eligibility to companies engaged in manufacturing, research and development, and renewable electric energy production to apply to school districts for property value limitations. Subsequent legislative changes expanded eligibility to clean coal projects, nuclear power generation and data centers, among others.

Under the provisions of Chapter 313, ECISD may offer a minimum value limitation of $100 million. The provisions of Chapter 313 call for the project to be fully taxable in the 2014-15 and 2015-16 school years, unless the District and the Company agree to an extension of the start of the two-year qualifying time period. For the purpose of this analysis, it is assumed that the qualifying time period will be the 2014-15 and 2015-16 school years. Beginning with the 2016-17 school year, the project would go on the local tax roll at $100 million and remain at that level of taxable value for eight years for maintenance and operations (M&O) taxes.

The full taxable value of the project could be assessed for debt service taxes on voter-approved bond issues throughout the limitation period, with ECISD currently levying a $0.0795 per $100 I&S tax rate. The taxable value of the investment is expected to reach $1.26 billion in the 2017-18 school year, with depreciation expected to reduce the value of the project over the course of the value limitation agreement. At its peak value, the Summit Texas project would represent about a 10 percent increase in the District's I&S tax base. (Substantial exemptions for pollution control equipment are identified in the application, accounting for much of the difference between the investment level and the taxable value of the project.)

In the case of the Summit Texas project, the agreement calls for a calculation of the revenue impact of the value limitation in years 3-10 of the agreement, under whatever school finance and property tax laws are in effect in each of those years. Under current law, ECISD would experience a $10.2 million revenue loss as a result of the implementation of the value limitation in the 2016-17 school year. In the 2017-18 school year, a $2.3 million revenue loss is anticipated, with very small out-year losses expected. Total revenue losses are estimated at $10.6 million.

Under the assumptions outlined below, the potential tax benefits under a Chapter 313 agreement could reach an estimated $66 million over the course of the agreement. This amount is net of any anticipated revenue losses for the District.

## School Finance Mechanics

Under the current school finance system, the property values established by the Comptroller's Office that are used to calculate state aid and recapture lag by one year, a practical consequence of the fact that the Comptroller's Office needs this time to conduct its property value study and the planned audits of appraisal district operations in alternating years. A taxpayer receiving a value limitation pays M&O taxes on the reduced value for the project in years 3-10 and receives a tax bill for I&S taxes based on the full project value throughout the qualifying and value limitation periods (and thereafter). The school funding formulas use the Comptroller's property values that reflect a reduction due to the property value limitation in years 4-11of the agreement as a result of the one-year lag in property values.

The third year is often problematical financially for a school district that approves a Chapter 313 value limitation. The implementation of the value limitation often results in a revenue loss to the school district in the third year of the agreement that would not be reimbursed by the state, but require some type of compensation from the applicant under the revenue protection provisions of the agreement. In years 4-10, smaller revenue losses would be anticipated when the state M&O property values are aligned at the minimum value established by the Board on both the local tax roll and the corresponding state property value study.

Under the HB 1 system adopted in 2006, most school districts received additional state aid for tax reduction (ASATR) that was used to maintain their target revenue amounts established at the revenue levels under old law for the 2005-06 or 2006-07 school years, whichever was highest. In terms of new Chapter 313 property value limitation agreements, adjustments to ASATR funding often moderated the impact of the reduced M&O collections as a result of the limitation, in contrast with the earlier formula-driven finance system.

House Bill 3646 as enacted in 2009 created more "formula" school districts that were less dependent on ASATR state aid than had been the case previously. The formula reductions enacted during the First Called Session in 2011 made $4 billion in reductions to the existing school funding formulas for the 2011-12 and 2012-13 school years. For the 2011-12 school year, across-the-board reductions were made that reduced each district's students in weighted average daily attendance (WADA) count and resulted in an estimated 781 school districts still receiving ASATR to maintain their target revenue funding levels, while an estimated 243 districts operated directly on the state formulas. For the 2012-13 school year, the changes called for smaller across-the-board reductions and funding ASATR-receiving target revenue districts at 92.35 percent of the level provided for under the existing funding formula, with 689 districts operating on formula and 335 districts still receiving ASATR funding.

Senate Bill 1 and House Bill 1025 as passed by the 83rd Legislature made significant increases to the basic allotment and other formula changes by appropriation. The ASATR reduction percentage is increased slightly to 92.63 percent, while the basic allotment is increased by $325 and $365, respectively, for the 2013-14 and 2014-15 school years. A slight increase in the guaranteed yield for the six cents above compressed—known as the Austin yield—is also included. With the basic allotment increase, it is estimated that approximately 300 school districts will still receive ASATR in the 2013-14 school year and 273 districts will do so in the 2014-15 school year. Current state policy calls for ASATR funding to be eliminated by the 2017-18 school year.

In the case of ECISD, it is now classified as a formula school district, although it did receive some ASATR funds through the 2011-12 school year. ECISD has a relatively low target revenue level of $4,850 per WADA, more than $300 below the state average. Based on the estimates presented below, ECISD is not expected to receive future ASATR funds, with or without the value limitation in place.

One concern in projecting into the future is that the underlying state statutes in the Education Code were not changed in order to provide these funding increases. All of the major formula changes were made by appropriation, which gives them only a two-year lifespan unless renewed in the 2015 legislative session. Despite this uncertainty, it is assumed that these changes will remain in effect for the forecast period for the purpose of these estimates, assuming a continued legislative commitment to these funding levels in future years.

A key element in any analysis of the school finance implications is the provision for revenue protection in the agreement between the school district and the applicant. In the case of the Summit Texas project, the agreement calls for a calculation of the revenue impact of the value limitation in years 3-10 of the agreement, under whatever school finance and property tax laws are in effect in each of those years. This meets the statutory requirement under Section 313.027(f)(1) of the Tax Code to provide school district revenue protection language in the agreement.

## Underlying Assumptions

There are several approaches that can be used to analyze the future revenue stream of a school district under a value limitation. Whatever method is used, a reasonable analysis requires the use of a multi-year forecasting model that covers the years in which the agreement is in effect. The Chapter 313 application now requires 15 years of data and analysis on the project being considered for a property value limitation.

The general approach used here is to maintain static enrollment and property values in order to isolate the effects of the value limitation under the school finance system. The SB 1and HB 1025 basic allotment increases are reflected in the underlying models. With regard to ASATR funding, the 92.63 percent reduction enacted for the 2013-14 school year is maintained until the 2017-18 school year. A statement of legislative intent was adopted in 2011 to no longer fund target revenue by the 2017-18 school year, so that change is reflected in the estimates presented below. The projected taxable values of the Summit Texas project are factored into the base model used here in order to simulate the financial impact of the project being constructed in the absence of a value limitation agreement. The impact of the limitation value for the proposed Summit Texas project is isolated separately and the focus of this analysis.

Student enrollment counts are held constant at 26,941 students in average daily attendance (ADA) in analyzing the effects of the Summit Texas project on the finances of ECISD. The District's local tax base reached $11.8 billion for the 2012 tax year and is maintained at that level for the forecast period in order to isolate the effects of the property value limitation. An M&O tax rate of $1.04 per $100 is used throughout this analysis. ECISD has estimated state property wealth per weighted ADA or WADA of approximately $347,096 for the 2013-14 school year, which would classify ECISD as a moderate-wealth school district.

ECISD has a compressed tax rate of $0.933 for the purposes of calculating Tier I state aid. With a $1.04 per $100 M&O tax rate, the District has some pennies of local tax effort that are subject to recapture at the $319,500 per WADA level, which is often referred to as the Tier II recapture level. The enrollment and property value assumptions for the 15 years that are the subject of this analysis are summarized in Table 1.

## School Finance Impact

School finance models were prepared for ECISD under the assumptions outlined above through the 2028-29 school year. Beyond the 2014-15 school year, no attempt was made to forecast the 88$^{th}$ percentile or Austin yield that influence future state funding beyond the projected level for that school year. In the analyses for other districts and applicants on earlier projects, these changes appeared to have little impact on the revenue associated with the implementation of the property value limitation, since the baseline and other models incorporate the same underlying assumptions.

Under the proposed agreement, a model is established to make a calculation of the "Baseline Revenue" by adding the value of the proposed Summit Texas facility to the model, but without assuming that a value limitation is approved. The results of this model are shown in Table 2.

A second model is developed which adds the Summit Texas taxable value but imposes the proposed property value limitation effective in the third year, which in this case is the 2016-17 school year. The results of this model are identified as "Value Limitation Revenue Model" under the revenue protection provisions of the proposed agreement. (See Table 3.) A summary of the differences between these models is shown in Table 4.

It should be noted that the revenue-loss methodology used here is the same approach that has been used to calculate hold-harmless losses for school districts since the first property value limitations were approved in 2002. Comparing the limitation model with one assuming that the project is fully taxed has been the accepted approach for more than a decade, with very few exceptions. Major projects such as Toyota and two major Samsung expansions were based on the revenue-loss methodology used in this report. The revenue-loss calculations for the earlier Summit Texas application were also based on this approach.

Under these assumptions, ECISD would experience a revenue loss of $10.2 million as a result of the implementation of the value limitation in the 2016-17 school year, followed by a $2.3 million revenue loss for the 2017-18 school year. The revenue reduction results from the mechanics of the up to six cents beyond the compressed M&O tax rate equalized to the Austin yield or not subject to recapture, which reflect the one-year lag in value associated with the property value study. Some Tier II state aid is lost as a result of the implementation of the value limitation. This is accompanied by a partial offset in reduced Tier II recapture payments that would be owed to the state.

The Comptroller's state property value study significantly influences these calculations. At the school-district level, a taxpayer benefiting from a property value limitation has two property values assigned by the local appraisal district for their property covered by the limitation: (1) a reduced value for M&O taxes, and (2) the full taxable value for I&S taxes. This situation exists for the eight years that the value limitation is in effect. Two state value determinations are also made for school districts granting Chapter 313 agreements, consistent with local practice. A consolidated single state property value had been provided previously.

Beginning in the 2017-18 school year, reduced state M&O taxable values resulting from the implementation of the value limitation are reflected in the state aid calculations for that year, generating a significant state aid offset in the 2017-18 school year and the remaining limitation years. Tier II recapture reductions as a result of the lower property wealth from the limitation are also shown in Table 4.

### Impact on the Taxpayer

Table 5 summarizes the impact of the proposed property value limitation in terms of the potential tax savings under the property value limitation agreement. The focus of this table is on the M&O tax rate only. As noted previously, the property is fully taxable in the first two years under the agreement. A $1.04 per $100 of taxable value M&O rate is assumed in 2012-13 and thereafter.

Under the assumptions used here, the potential tax savings from the value limitation total $73.5 million over the life of the agreement. In addition, Summit Texas would be eligible for a tax credit for M&O taxes paid on value in excess of the value limitation in each of the first two qualifying years. The credit amount is paid out slowly through years 4-10 due to statutory limits on the scale of these payments over these seven years, with catch-up payments permitted in years 11-13. The tax credits are expected to total approximately $5.1 million over the life of the agreement, with no unpaid tax credits anticipated. The school district is to be reimbursed by the Texas Education Agency for the cost of these credits.

The key ECISD revenue losses are expected to total approximately $12.6 million in the first two school years that the value limitatioon is implemented. In total, the potential net tax benefits (inclusive of tax credits but after hold-harmless payments are made) are estimated to reach $66.0 million over the life of the agreement.

### Facilities Funding Impact

The Summit Texas project remains fully taxable for debt services taxes, with ECISD currently levying a $0.0795per $100 I&S rate. The value of the Summit Texas project is expected to depreciate over the life of the agreement and beyond, but full access to the additional value is expected to increase the District's projected I&S tax base by about 10 percent in the project's peak value year. This increased value should assist ECISD in meeting its debt service needs.

The Summit Texas project is not expected to have a significant impact on school facilities once the plant begins operation, with 100 permanent jobs expected. During the construction phase, however, up to 1,600 FTEs are expected to be working on the project, which could have a significant impact on the operations and facilities of ECISD. While housing availability will obviously affect enrollment, provisions to offset extraordinary education-related expenses that might be faced by ECISD during the construction phase are needed as part of the agreement.

### Conclusion

The proposed Summit Texas project enhances the tax base of ECISD. It reflects continued capital investment in keeping with the goals of Chapter 313 of the Tax Code.

Under the assumptions outlined above, the potential tax savings for the applicant under a Chapter 313 agreement could reach an estimated $66 million. (This amount is net of any anticipated revenue losses for the District.) The additional taxable value also enhances the tax base of ECISD in meeting its future debt service obligations.

**Table 1 – Base District Information with Summit Texas Clean Energy, LLC Project Value and Limitation Values**

| Year of Agreement | School Year | ADA | WADA | M&O Tax Rate | I&S Tax Rate | CAD Value with Project | CAD Value with Limitation | CPTD with Project | CPTD With Limitation | CPTD Value with Project per WADA | CPTD Value with Limitation per WADA |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Pre-Year 1 | 2013-14 | 26,941.40 | 34,587.12 | $1.0400 | $0.0795 | $11,834,077,096 | $11,834,077,096 | $12,005,057,664 | $12,005,057,664 | $347,096 | $347,096 |
| 1 | 2014-15 | 26,941.40 | 34,589.26 | $1.0400 | $0.0795 | $11,834,557,096 | $11,834,557,096 | $12,005,057,664 | $12,005,057,664 | $347,075 | $347,075 |
| 2 | 2015-16 | 26,941.40 | 34,589.26 | $1.0400 | $0.0795 | $12,423,723,737 | $12,423,723,737 | $12,005,537,664 | $12,005,537,664 | $347,089 | $347,089 |
| 3 | 2016-17 | 26,941.40 | 34,589.26 | $1.0400 | $0.0795 | $12,884,198,916 | $11,934,077,096 | $12,594,704,305 | $12,594,704,305 | $364,122 | $364,122 |
| 4 | 2017-18 | 26,941.40 | 34,589.26 | $1.0400 | $0.0795 | $13,092,528,714 | $11,934,077,096 | $13,055,179,484 | $12,105,057,664 | $377,434 | $349,966 |
| 5 | 2018-19 | 26,941.40 | 34,589.26 | $1.0400 | $0.0795 | $12,774,533,605 | $11,934,077,096 | $13,263,509,282 | $12,105,057,664 | $383,457 | $349,966 |
| 6 | 2019-20 | 26,941.40 | 34,589.26 | $1.0400 | $0.0795 | $12,768,779,809 | $11,934,077,096 | $12,945,514,173 | $12,105,057,664 | $374,264 | $349,966 |
| 7 | 2020-21 | 26,941.40 | 34,589.26 | $1.0400 | $0.0795 | $12,762,981,294 | $11,934,077,096 | $12,939,760,377 | $12,105,057,664 | $374,098 | $349,966 |
| 8 | 2021-22 | 26,941.40 | 34,589.26 | $1.0400 | $0.0795 | $12,757,139,555 | $11,934,077,096 | $12,933,961,862 | $12,105,057,664 | $373,930 | $349,966 |
| 9 | 2022-23 | 26,941.40 | 34,589.26 | $1.0400 | $0.0795 | $12,751,256,140 | $11,934,077,096 | $12,928,120,123 | $12,105,057,664 | $373,761 | $349,966 |
| 10 | 2023-24 | 26,941.40 | 34,589.26 | $1.0400 | $0.0795 | $12,745,332,641 | $11,934,077,096 | $12,922,236,708 | $12,105,057,664 | $373,591 | $349,966 |
| 11 | 2024-25 | 26,941.40 | 34,589.26 | $1.0400 | $0.0795 | $12,739,370,688 | $12,739,370,688 | $12,916,313,209 | $12,105,057,664 | $373,420 | $349,966 |
| 12 | 2025-26 | 26,941.40 | 34,589.26 | $1.0400 | $0.0795 | $12,733,371,942 | $12,733,371,942 | $12,910,351,256 | $12,910,351,256 | $373,247 | $373,247 |
| 13 | 2026-27 | 26,941.40 | 34,589.26 | $1.0400 | $0.0795 | $12,727,338,090 | $12,727,338,090 | $12,904,352,510 | $12,904,352,510 | $373,074 | $373,074 |
| 14 | 2027-28 | 26,941.40 | 34,589.26 | $1.0400 | $0.0795 | $12,721,270,841 | $12,721,270,841 | $12,898,318,658 | $12,898,318,658 | $372,900 | $372,900 |
| 15 | 2028-29 | 26,941.40 | 34,589.26 | $1.0400 | $0.0795 | $12,715,171,922 | $12,715,171,922 | $12,892,251,409 | $12,892,251,409 | $372,724 | $372,724 |

*Basic Allotment: $5,040; AISD Yield: $61.86; Equalized Wealth: $504,000 per WADA

**Table 2– "Baseline Revenue Model"--Project Value Added with No Value Limitation**

| Year of Agreement | School Year | M&O Taxes @ Compressed Rate | State Aid | Additional State Aid-Hold Harmless | Excess Formula Reduction | Recapture Costs | Additional Local M&O Collections | State Aid From Additional M&O Tax Collections | Recapture from the Additional Local Tax Effort | Total General Fund |
|---|---|---|---|---|---|---|---|---|---|---|
| Pre-Year 1 | 2013-14 | $107,421,420 | $59,271,731 | $0 | $0 | $0 | $12,270,749 | $5,025,437 | -$405,254 | $183,584,084 |
| 1 | 2014-15 | $107,425,811 | $62,335,333 | $0 | $0 | $0 | $12,271,251 | $5,402,424 | -$404,981 | $187,029,838 |
| 2 | 2015-16 | $112,814,991 | $62,330,853 | $0 | $0 | $0 | $12,886,857 | $5,821,275 | -$425,494 | $193,428,482 |
| 3 | 2016-17 | $117,204,379 | $56,831,689 | $0 | $0 | $0 | $13,388,257 | $5,412,419 | -$681,525 | $192,155,219 |
| 4 | 2017-18 | $119,148,888 | $52,533,706 | $0 | $0 | $0 | $13,610,378 | $5,037,993 | -$867,807 | $189,463,159 |
| 5 | 2018-19 | $116,180,785 | $50,589,197 | $0 | $0 | $0 | $13,271,331 | $4,718,026 | -$919,487 | $183,839,853 |
| 6 | 2019-20 | $116,127,080 | $53,557,300 | $0 | $0 | $0 | $13,265,197 | $5,015,055 | -$806,284 | $187,158,349 |
| 7 | 2020-21 | $116,072,958 | $53,611,005 | $0 | $0 | $0 | $13,259,014 | $5,018,265 | -$803,817 | $187,157,425 |
| 8 | 2021-22 | $116,018,433 | $53,665,127 | $0 | $0 | $0 | $13,252,786 | $5,021,499 | -$801,332 | $187,156,513 |
| 9 | 2022-23 | $115,963,518 | $53,719,652 | $0 | $0 | $0 | $13,246,513 | $5,024,759 | -$798,828 | $187,155,614 |
| 10 | 2023-24 | $115,908,229 | $53,774,567 | $0 | $0 | $0 | $13,240,197 | $5,028,042 | -$796,307 | $187,154,729 |
| 11 | 2024-25 | $115,702,253 | $53,829,856 | $0 | $0 | $0 | $13,216,669 | $5,024,820 | -$792,738 | $186,980,859 |
| 12 | 2025-26 | $115,647,381 | $53,885,503 | $0 | $0 | $0 | $13,210,401 | $5,028,189 | -$790,194 | $186,981,280 |
| 13 | 2026-27 | $115,592,189 | $53,941,495 | $0 | $0 | $0 | $13,204,096 | $5,031,580 | -$787,635 | $186,981,726 |
| 14 | 2027-28 | $115,536,691 | $53,997,813 | $0 | $0 | $0 | $13,197,757 | $5,034,991 | -$785,060 | $186,982,192 |
| 15 | 2028-29 | $115,480,904 | $54,054,444 | $0 | $0 | $0 | $13,191,384 | $5,038,422 | -$782,472 | $186,982,682 |

**Table 3– "Value Limitation Revenue Model"--Project Value Added with Value Limit**

| Year of Agreement | School Year | M&O Taxes @ Compressed Rate | State Aid | Additional State Aid- Hold Harmless | Excess Formula Reduction | Recapture Costs | Additional Local M&O Collections | State Aid From Additional M&O Tax Collections | Recapture from the Additional Local Tax Effort | Total General Fund |
|---|---|---|---|---|---|---|---|---|---|---|
| Pre-Year 1 | 2013-14 | $107,421,420 | $59,271,731 | $0 | $0 | $0 | $12,270,749 | $5,025,437 | -$405,254 | $183,584,084 |
| 1 | 2014-15 | $107,425,811 | $62,335,333 | $0 | $0 | $0 | $12,271,251 | $5,402,424 | -$404,981 | $187,029,838 |
| 2 | 2015-16 | $112,814,991 | $62,330,853 | $0 | $0 | $0 | $12,886,857 | $5,821,275 | -$425,494 | $193,428,482 |
| 3 | 2016-17 | $108,336,132 | $56,831,689 | $0 | $0 | $0 | $12,375,237 | $5,002,889 | -$629,958 | $181,915,990 |
| 4 | 2017-18 | $108,336,132 | $61,401,953 | $0 | $0 | $0 | $12,375,237 | $5,486,952 | -$447,505 | $187,152,769 |
| 5 | 2018-19 | $108,336,132 | $61,401,953 | $0 | $0 | $0 | $12,375,237 | $5,486,952 | -$447,505 | $187,152,769 |
| 6 | 2019-20 | $108,336,132 | $61,401,953 | $0 | $0 | $0 | $12,375,237 | $5,486,952 | -$447,505 | $187,152,769 |
| 7 | 2020-21 | $108,336,132 | $61,401,953 | $0 | $0 | $0 | $12,375,237 | $5,486,952 | -$447,505 | $187,152,769 |
| 8 | 2021-22 | $108,336,132 | $61,401,953 | $0 | $0 | $0 | $12,375,237 | $5,486,952 | -$447,505 | $187,152,769 |
| 9 | 2022-23 | $108,336,132 | $61,401,953 | $0 | $0 | $0 | $12,375,237 | $5,486,952 | -$447,505 | $187,152,769 |
| 10 | 2023-24 | $108,336,132 | $61,401,953 | $0 | $0 | $0 | $12,375,237 | $5,486,952 | -$447,505 | $187,152,769 |
| 11 | 2024-25 | $115,702,253 | $61,401,953 | $0 | $0 | $0 | $13,216,669 | $5,860,027 | -$477,932 | $195,702,970 |
| 12 | 2025-26 | $115,647,381 | $53,885,503 | $0 | $0 | $0 | $13,210,401 | $5,028,189 | -$790,194 | $186,981,280 |
| 13 | 2026-27 | $115,592,189 | $53,941,495 | $0 | $0 | $0 | $13,204,096 | $5,031,580 | -$787,635 | $186,981,726 |
| 14 | 2027-28 | $115,536,691 | $53,997,813 | $0 | $0 | $0 | $13,197,757 | $5,034,991 | -$785,060 | $186,982,192 |
| 15 | 2028-29 | $115,480,904 | $54,054,444 | $0 | $0 | $0 | $13,191,384 | $5,038,422 | -$782,472 | $186,982,682 |

**Table 4 – Value Limit less Project Value with No Limit**

| Year of Agreement | School Year | M&O Taxes @ Compressed Rate | State Aid | Additional State Aid- Hold Harmless | Excess Formula Reduction | Recapture Costs | Additional Local M&O Collections | State Aid From Additional M&O Tax Collections | Recapture from the Additional Local Tax Effort | Total General Fund |
|---|---|---|---|---|---|---|---|---|---|---|
| Pre-Year 1 | 2013-14 | $0 | $0 | $0 | $0 | $0 | $0 | $0 | $0 | $0 |
| 1 | 2014-15 | $0 | $0 | $0 | $0 | $0 | $0 | $0 | $0 | $0 |
| 2 | 2015-16 | $0 | $0 | $0 | $0 | $0 | $0 | $0 | $0 | $0 |
| 3 | 2016-17 | -$8,868,247 | $0 | $0 | $0 | $0 | -$1,013,020 | -$409,530 | $51,567 | -$10,239,229 |
| 4 | 2017-18 | -$10,812,756 | $8,868,247 | $0 | $0 | $0 | -$1,235,141 | $448,959 | $420,302 | -$2,310,389 |
| 5 | 2018-19 | -$7,844,653 | $10,812,756 | $0 | $0 | $0 | -$896,095 | $768,926 | $471,982 | $3,312,917 |
| 6 | 2019-20 | -$7,790,948 | $7,844,653 | $0 | $0 | $0 | -$889,960 | $471,897 | $358,779 | -$5,579 |
| 7 | 2020-21 | -$7,736,826 | $7,790,948 | $0 | $0 | $0 | -$883,778 | $468,687 | $356,313 | -$4,656 |
| 8 | 2021-22 | -$7,682,300 | $7,736,826 | $0 | $0 | $0 | -$877,549 | $465,452 | $353,827 | -$3,744 |
| 9 | 2022-23 | -$7,627,386 | $7,682,301 | $0 | $0 | $0 | -$871,276 | $462,193 | $351,323 | -$2,845 |
| 10 | 2023-24 | -$7,572,097 | $7,627,386 | $0 | $0 | $0 | -$864,961 | $458,909 | $348,802 | -$1,960 |
| 11 | 2024-25 | $0 | $7,572,097 | $0 | $0 | $0 | $0 | $835,207 | $314,806 | $8,722,111 |
| 12 | 2025-26 | $0 | $0 | $0 | $0 | $0 | $0 | $0 | $0 | $0 |
| 13 | 2026-27 | $0 | $0 | $0 | $0 | $0 | $0 | $0 | $0 | $0 |
| 14 | 2027-28 | $0 | $0 | $0 | $0 | $0 | $0 | $0 | $0 | $0 |
| 15 | 2028-29 | $0 | $0 | $0 | $0 | $0 | $0 | $0 | $0 | $0 |

**Table 5 - Estimated Financial Impact of the Summit Texas Clean Energy, LLC Project Property Value Limitation Request Submitted to ECISD at $1.04 M&O Tax Rate**

| Year of Agreement | School Year | Project Value | Estimated Taxable Value | Value Savings | Assumed M&O Tax Rate | Taxes Before Value Limit | Taxes after Value Limit | Tax Savings @ Projected M&O Rate | Tax Credits for First Two Years Above Limit | Tax Benefit to Company Before Revenue Protection | School District Revenue Losses | Estimated Net Tax Benefits |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Pre-Year 1 | 2013-14 | $480,000 | $0 | $0 | $1.040 | $4,992 | $4,992 | $0 | $0 | $0 | $0 | $0 |
| 1 | 2014-15 | $480,000 | $480,000 | $0 | $1.040 | $4,992 | $4,992 | $0 | $0 | $0 | $0 | $0 |
| 2 | 2015-16 | $589,646,641 | $589,646,641 | $0 | $1.040 | $6,132,325 | $6,132,325 | $0 | $0 | $0 | $0 | $0 |
| 3 | 2016-17 | $1,050,121,820 | $100,000,000 | $950,121,820 | $1.040 | $10,921,267 | $1,040,000 | $9,881,267 | $0 | $9,881,267 | -$10,239,229 | -$357,962 |
| 4 | 2017-18 | $1,258,451,618 | $100,000,000 | $1,158,451,618 | $1.040 | $13,087,897 | $1,040,000 | $12,047,897 | $727,475 | $12,775,372 | -$2,310,389 | $10,464,983 |
| 5 | 2018-19 | $940,456,509 | $100,000,000 | $840,456,509 | $1.040 | $9,780,748 | $1,040,000 | $8,740,748 | $727,475 | $9,468,223 | $0 | $9,468,223 |
| 6 | 2019-20 | $934,702,713 | $100,000,000 | $834,702,713 | $1.040 | $9,720,908 | $1,040,000 | $8,680,908 | $727,475 | $9,408,383 | -$5,579 | $9,402,804 |
| 7 | 2020-21 | $928,904,198 | $100,000,000 | $828,904,198 | $1.040 | $9,660,604 | $1,040,000 | $8,620,604 | $727,475 | $9,348,079 | -$4,656 | $9,343,423 |
| 8 | 2021-22 | $923,062,459 | $100,000,000 | $823,062,459 | $1.040 | $9,599,850 | $1,040,000 | $8,559,850 | $727,475 | $9,287,325 | -$3,744 | $9,283,580 |
| 9 | 2022-23 | $917,179,044 | $100,000,000 | $817,179,044 | $1.040 | $9,538,662 | $1,040,000 | $8,498,662 | $727,475 | $9,226,137 | -$2,845 | $9,223,292 |
| 10 | 2023-24 | $911,255,545 | $100,000,000 | $811,255,545 | $1.040 | $9,477,058 | $1,040,000 | $8,437,058 | $727,475 | $9,164,533 | -$1,960 | $9,162,573 |
| 11 | 2024-25 | $905,293,592 | $905,293,592 | $0 | $1.040 | $9,415,053 | $9,415,053 | $0 | $0 | $0 | $0 | $0 |
| 12 | 2025-26 | $899,294,846 | $899,294,846 | $0 | $1.040 | $9,352,666 | $9,352,666 | $0 | $0 | $0 | $0 | $0 |
| 13 | 2026-27 | $893,260,994 | $893,260,994 | $0 | $1.040 | $9,289,914 | $9,289,914 | $0 | $0 | $0 | $0 | $0 |
| 14 | 2027-28 | $887,193,745 | $887,193,745 | $0 | $1.040 | $9,226,815 | $9,226,815 | $0 | $0 | $0 | $0 | $0 |
| 15 | 2028-29 | $881,094,826 | $881,094,826 | $0 | $1.040 | $9,163,386 | $9,163,386 | $0 | $0 | $0 | $0 | $0 |
| | | | | Totals | | $134,372,145 | $60,905,152 | $73,466,993 | $5,092,325 | $78,559,318 | -$12,568,402 | $65,990,915 |

Tax Credit for Value Over Limit in First 2 Years

| Year 1 | Year 2 | Max Credits |
|---|---|---|
| $0 | $5,092,325 | $5,092,325 |
| Credits Earned | | $5,092,325 |
| Credits Paid | | $5,092,325 |
| Excess Credits Unpaid | | $0 |

***Note: School District Revenue-Loss estimates are subject to change based on numerous factors, including legislative and Texas Education Agency administrative changes to school finance formulas, year-to-year appraisals of project values, and changes in school district tax rates. One of the most substantial changes to the school finance formulas related to Chapter 313 revenue-loss projections could be the treatment of Additional State Aid for Tax Reduction (ASATR). Legislative intent is to end ASATR in 2017-18 school year. Additional information on the assumptions used in preparing these estimates is provided in the narrative of this Report.**