Chapter 313 Property Value Limitation
Financial Impact of the Proposed Port Arthur LNG, LLC Project in the Sabine Pass Independent School District
(Project # 1117)

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Executive Summary

Port Arthur LNG, LLC (Company) has requested that the Sabine Pass Independent School District (SPISD) 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 SPISD on December 14, 2015 the Company plans to invest $5.4 billion to construct an LNG manufacturing facility. Moak, Casey & Associates (MCA) has been retained to prepare an analysis of this value limitation and help the district navigate the overall application and agreement process.

The Port Arthur LNG 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, SPISD may offer a minimum value limitation of $30 million. This value limitation, under the proposed application, will begin in the 2023-24 school year and remain at that level of taxable value for Maintenance and Operations (M&O) tax purposes for ten years. The entire project value will remain taxable for I&S or debt service purposes for the term of the agreement.

MCA's initial school finance analysis is detailed in this report, incorporating the major legislative changes adopted in May. The overall conclusions are as follows, but please read all of the subsquent details in the report below for more information.

Total Revenue Loss Payment owed to SPISD	$19.0 million
Total Savings to Company after Revenue Loss Payment. (This does not include any supplemental benefit payments to the district.)	$408.1 million

Application Process

After the school district has submitted an application to the Comptroller's Office (Comptroller), the Comptroller begins reviewing the application for completeness. The purpose of this review is to ensure all necessary information and attachments are included in the application before moving forward with the formal review process. The Comptroller's Office issued a Completeness Letter for the application on February 16, 2016.

The issuance of a Completeness Letter is important because it sets the timeline for the rest of process. From the date of issuance, the Comptroller has 90 days to conduct its full review of the project and provide its certificate for a limitation on appraised value. The Comptroller issued the Certificate for the Port Arthur LNG project on May 16, 2016.

Each value limitation agreement is unique and to ensure the proper revenue-loss protection and maximum supplemental benefits are in place, an understanding of the school district's finances and a thorough knowledge of the Ch. 313 statute are required. MCA and O'Hanlon, McCollom & Demerath will ensure the best interests of SPISD are secured. After the Comptroller's certificate is received, a participation agreement was negotiated with the Company, in consultation with the District. A final version of the agreement was submitted to the Comptroller for review prior to final adoption by the school district's board of trustees.

At the final board meeting, the school board will review the Value Limitation Agreement and Findings of Fact that detail the project's conformance with state law. In some instances, the school board will also be required to create a reinvestment zone during this meeting, in the board's consideration of the Port Arthur LNG application. Prior to this meeting, O'Hanlon, McCollom & Demerath will provide the district with the necessary agenda language and any additional action items.

How the 313 Agreement Interacts with Texas School Finance

M&O funding for Texas schools relies on two methods of finance: local school district property taxes and state aid. State aid consists of three components: Tier I, Tier II and additional state aid for tax reduction (ASATR), although ASATR is currently scheduled to be eliminated by the 2017-18 school year. (For more detailed information on the school finance funding system, please review the Texas Education Agency's School Finance 101: Funding of Texas Public Schools.)

Tier I provides state funding based on ADA and special student populations, as well as transportation. The local funds for Tier I are M&O taxes raised at the compressed tax rate—$1.00 per $100 of taxable value for most school districts (less any recapture payments owed to the state from high property-wealth school districts).

Tier II guarantees a specific amount of funding per student in weighted average daily attendance for each penny of a school district's tax effort above a specified level. There are two levels of Tier II funding—funding under the six so-called golden pennies and the eleven so-called copper pennies. Voter approval is required in most cases to access the last two golden pennies and the eleven copper pennies.

Additional State Aid for Tax Reduction (ASATR) guarantees a school district a set amount of state and local M&O funds per student in weighted average daily attendance to compensate for the mandatory reduction in, or compression of, the local M&O tax rate that was adopted in 2005 or 2006. ASATR funding is expected to be eliminated by the 2017-18 school year under current law and is not a factor in the estimates shown below.

For a school district that approves a Chapter 313 value limitation, the first year is often problematic financially. The implementation of the value limitation often results in an M&O revenue loss to the school district in the first year of the limitation that would not be reimbursed by the state, but require some type of compensation from the Company under the revenue protection provisions of the agreement. This is because the general school finance formula system calculates state aid entitlements using the property value for the preceding year as certified by the Comptroller.

In most instances smaller revenue losses would be anticipated in years 2-10 of the limitation 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. **If the full value of the project increases significantly during the value limitation period, the revenue losses may be greater than originally estimated.**

A taxpayer receiving a value limitation pays M&O taxes on the reduced value for the project in years 1-10 and receives a tax bill for I&S taxes based on the full project value throughout the qualifying and value limitation period (and thereafter).

Future legislative action on school funding could potentially affect the impact of the value limitation on the school district's finances and result in revenue-loss estimates that differ from the estimates presented in this report.

Underlying School District Data Assumptions

A key element in any analysis of the school finance implications of a Chapter 313 agreement is the provision for revenue protection in the agreement between the school district and the applicant. The agreement calls for a calculation of the revenue impact of the value limitation in years 1-10 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. This approach also reduces guess work as to future changes in school finance and property tax laws.

The general approach used here to analyze the future revenue stream of the school district under a value limitation is to maintain static enrollment and property values in order to isolate the effects of the value limitation under the school finance system. Student enrollment counts are held constant at 341 students in average daily attendance (ADA) in analyzing the effects of the project on the finances of SPISD. The District's local tax base reached $563.6 million for the 2015 tax year (the most recent year available) and is maintained 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. The impact of any previously-approved Chapter 313 projects is factored into the M&O tax bases used for both models presented below.

SPISD has estimated 2015-16 state property wealth per weighted ADA or WADA of approximately $981.8 million. As a result, SPISD is considered a Chapter 41 or recapture district under the school finance system. Table 1 summarizes the enrollment and property value assumptions for the 15 years that are the subject of this analysis.

Recent legislative changes are incorporated into these estimates. The basic allotment was raised from $5,040 to $5,140 per WADA, which is used throughout the state aid calculations. The Tier II guaranteed yield level for up to six cents of tax effort was increased from $61.86 in 2014-15 to $74.28 and $77.53, respectively, for the 2015-16 and 2016-17 school years.

The mandated school district homestead exemption increase from $15,000 to $25,000 has been incorporated into the analysis. Given that the models below focus exclusively on the Port Arthur LNG, LLC project values, however, the homestead exemption change does not have a significant impact on this analysis.

The M&O tax rate is maintained at $1.04 per $100. Although the impact of the Chapter 313 project value returning to the total tax roll for M&O funding purposes could result in a lower M&O tax rate that analysis is beyond the scope of this revenue report.

Table 1 – Base District Information with Port Arthur LNG 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
QTP0	2020-21	347.40	656.05	$1.0400	$0.1727	$5,292,950,293	$5,292,950,293	$2,690,397,863	$2,690,397,863	$4,100,879	$4,100,879
QTP1	2021-22	347.40	656.05	$1.0400	$0.1727	$3,699,762,293	$3,699,762,293	$5,288,262,543	$5,288,262,543	$8,060,712	$8,060,712
QTP2	2022-23	347.40	656.05	$1.0400	$0.1727	$3,930,974,293	$3,930,974,293	$3,695,074,543	$3,695,074,543	$5,632,272	$5,632,272
VL1	2023-24	347.40	656.05	$1.0400	$0.1727	$5,876,220,293	$1,049,735,613	$3,926,286,543	$3,926,286,543	$5,984,700	$5,984,700
VL2	2024-25	347.40	656.05	$1.0400	$0.1727	$6,237,504,293	$1,049,735,613	$5,871,532,543	$1,045,047,863	$8,949,770	$1,592,930
VL3	2025-26	347.40	656.05	$1.0400	$0.1727	$5,909,759,293	$1,049,735,613	$6,232,816,543	$1,045,047,863	$9,500,463	$1,592,930
VL4	2026-27	347.40	656.05	$1.0400	$0.1727	$5,599,402,293	$1,049,735,613	$5,905,071,543	$1,045,047,863	$9,000,893	$1,592,930
VL5	2027-28	347.40	656.05	$1.0400	$0.1727	$5,305,552,293	$1,049,735,613	$5,594,714,543	$1,045,047,863	$8,527,826	$1,592,930
VL6	2028-29	347.40	656.05	$1.0400	$0.1727	$5,027,369,293	$1,049,735,613	$5,300,864,543	$1,045,047,863	$8,079,921	$1,592,930
VL7	2029-30	347.40	656.05	$1.0400	$0.1727	$8,777,138,770	$5,062,822,090	$5,022,681,543	$1,045,047,863	$7,655,897	$1,592,930
VL8	2030-31	347.40	656.05	$1.0400	$0.1727	$9,991,105,297	$6,525,994,617	$8,772,451,020	$5,058,134,340	$13,371,538	$7,709,936
VL9	2031-32	347.40	656.05	$1.0400	$0.1727	$9,532,779,677	$6,303,483,997	$9,986,417,547	$6,521,306,867	$15,221,944	$9,940,198
VL10	2032-33	347.40	656.05	$1.0400	$0.1727	$9,096,057,986	$6,089,870,306	$9,528,091,927	$6,298,796,247	$14,523,335	$9,601,033
VP1	2033-34	347.40	656.05	$1.0400	$0.1727	$8,679,935,439	$8,679,935,439	$9,091,370,236	$6,085,182,556	$13,857,655	$9,275,429
VP2	2034-35	347.40	656.05	$1.0400	$0.1727	$8,283,450,489	$8,283,450,489	$8,675,247,689	$8,675,247,689	$13,223,374	$13,223,374
VP3	2035-36	347.40	656.05	$1.0400	$0.1727	$7,905,692,443	$7,905,692,443	$8,278,762,739	$8,278,762,739	$12,619,026	$12,619,026
VP4	2036-37	347.40	656.05	$1.0400	$0.1727	$7,545,790,710	$7,545,790,710	$7,901,004,693	$7,901,004,693	$12,043,223	$12,043,223
VP5	2037-38	347.40	656.05	$1.0400	$0.1727	$7,202,913,270	$7,202,913,270	$7,541,102,959	$7,541,102,959	$11,494,638	$11,494,638

QTP=	Qualifying Time Period
VL=	Value Limitation
VP=	Viable Presence

M&O Impact of the Port Arthur LNG project on SPISD

School finance models were prepared for SPISD under these assumptions through the 2037-38 school year. Under the proposed agreement, a model is established to make a calculation of the "Baseline Revenue Model" by adding the total value of the project to the model, but without assuming that a value limitation is approved. These model results are detailed in Table 2.

Additionally, a separate model is established to make a calculation of the "Value Limitation Revenue Model" by adding the project's limited value of $30 million to the model. These results are shown in Table 3.

Table 4 displays the results of the comparison between the Baseline Revenue Model and the Value Limitation Revenue Model (Tables 2 and 3). The difference between the two models indicates there will be a total revenue loss of $19.0 million over the course of the Agreement, with much of this loss reflected in the first limitation year (2023-24). Nearly all of the reduction in M&O taxes under the limitation agreement is offset through a reduction in recapture costs owed to the state under current law.

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	Recapture Costs	Additional Local M&O Collections	State Aid From Additional M&O Tax Collections	Recapture from the Additional Local Tax Effort	Homestead Hold Harmless	Other State Aid	Total General Fund
QTP0	2020-21	$51,795,578	$126,708	$0	-$43,998,031	$2,071,823	$0	$0	$2,992	$10,125	$10,009,195
QTP1	2021-22	$36,182,336	$126,708	$0	-$33,368,862	$1,447,293	$0	$0	$2,090	$10,125	$4,399,690
QTP2	2022-23	$38,448,213	$126,708	$0	-$34,203,675	$1,537,929	$0	$0	$2,221	$10,125	$5,921,521
VL1	2023-24	$58,502,186	$126,708	$0	-$52,452,430	$2,340,087	$0	$0	$3,379	$10,125	$8,530,055
VL2	2024-25	$62,115,026	$126,708	$0	-$57,800,706	$2,484,601	$0	$0	$3,588	$10,125	$6,939,342
VL3	2025-26	$58,837,576	$126,708	$0	-$54,980,717	$2,353,503	$0	$0	$3,398	$10,125	$6,350,594
VL4	2026-27	$55,734,006	$126,708	$0	-$51,877,805	$2,229,360	$0	$0	$3,219	$10,125	$6,225,614
VL5	2027-28	$52,795,506	$126,708	$0	-$48,939,969	$2,111,820	$0	$0	$3,049	$10,125	$6,107,240
VL6	2028-29	$50,013,676	$126,708	$0	-$46,158,810	$2,000,547	$0	$0	$2,889	$10,125	$5,995,135
VL7	2029-30	$86,708,753	$126,708	$0	-$79,709,853	$3,468,350	$0	$0	$5,008	$10,125	$10,609,092
VL8	2030-31	$98,555,784	$126,708	$0	-$93,978,132	$3,942,231	$0	$0	$5,692	$10,125	$8,662,409
VL9	2031-32	$94,017,030	$126,708	$0	-$90,170,403	$3,760,681	$0	$0	$5,430	$10,125	$7,749,572
VL10	2032-33	$89,692,536	$126,708	$0	-$85,846,313	$3,587,701	$0	$0	$5,181	$10,125	$7,575,938
VP1	2033-34	$85,013,297	$126,708	$0	-$81,192,173	$3,400,532	$0	$0	$4,910	$10,125	$7,363,400
VP2	2034-35	$81,127,745	$126,708	$0	-$77,306,362	$3,245,110	$0	$0	$4,686	$10,125	$7,208,013
VP3	2035-36	$77,425,716	$126,708	$0	-$73,604,054	$3,097,029	$0	$0	$4,472	$10,125	$7,059,997
VP4	2036-37	$73,898,679	$126,708	$0	-$70,076,718	$2,955,947	$0	$0	$4,268	$10,125	$6,919,010
VP5	2037-38	$70,538,480	$126,708	$0	-$66,716,200	$2,821,539	$0	$0	$4,074	$10,125	$6,784,727

22*Basic Allotment: $5,140; AISD Yield: $77.53; Equalized Wealth: $514,000 per WADA

QTP= Qualifying Time Period
VL= Value Limitation
VP= Viable Presence

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	Recapture Costs	Additional Local M&O Collections	State Aid From Additional M&O Tax Collections	Recapture from the Additional Local Tax Effort	Homestead Hold Harmless	Other State Aid	Total General Fund
QTP0	2020-21	$51,820,843	$126,708	$0	-$44,019,525	$2,072,834	$0	$0	$2,993	$10,125	$10,013,979
QTP1	2021-22	$36,207,600	$126,708	$0	-$33,392,207	$1,448,304	$0	$0	$2,091	$10,125	$4,402,622
QTP2	2022-23	$38,473,478	$126,708	$0	-$34,226,194	$1,538,939	$0	$0	$2,222	$10,125	$5,925,278
VL1	2023-24	$10,237,339	$126,708	$0	-$9,124,563	$409,494	$0	$0	$591	$10,125	$1,659,695
VL2	2024-25	$10,237,339	$126,708	$0	-$6,237,472	$409,494	$0	$0	$591	$10,125	$4,546,786
VL3	2025-26	$10,237,339	$126,708	$0	-$6,237,472	$409,494	$0	$0	$591	$10,125	$4,546,786
VL4	2026-27	$10,237,339	$126,708	$0	-$6,237,472	$409,494	$0	$0	$591	$10,125	$4,546,786
VL5	2027-28	$10,237,339	$126,708	$0	-$6,237,472	$409,494	$0	$0	$591	$10,125	$4,546,786
VL6	2028-29	$10,237,339	$126,708	$0	-$6,237,472	$409,494	$0	$0	$591	$10,125	$4,546,786
VL7	2029-30	$49,565,586	$126,708	$0	-$30,451,671	$1,982,623	$0	$0	$2,863	$10,125	$21,236,235
VL8	2030-31	$63,904,677	$126,708	$0	-$58,765,022	$2,556,187	$0	$0	$3,691	$10,125	$7,836,366
VL9	2031-32	$61,724,073	$126,708	$0	-$57,857,166	$2,468,963	$0	$0	$3,565	$10,125	$6,476,269
VL10	2032-33	$59,630,659	$126,708	$0	-$55,762,946	$2,385,226	$0	$0	$3,444	$10,125	$6,393,217
VP1	2033-34	$85,013,297	$126,708	$0	-$79,336,881	$3,400,532	$0	$0	$4,910	$10,125	$9,218,692
VP2	2034-35	$81,127,745	$126,708	$0	-$77,306,362	$3,245,110	$0	$0	$4,686	$10,125	$7,208,013
VP3	2035-36	$77,425,716	$126,708	$0	-$73,604,054	$3,097,029	$0	$0	$4,472	$10,125	$7,059,997
VP4	2036-37	$73,898,679	$126,708	$0	-$70,076,718	$2,955,947	$0	$0	$4,268	$10,125	$6,919,010
VP5	2037-38	$70,538,480	$126,708	$0	-$66,716,200	$2,821,539	$0	$0	$4,074	$10,125	$6,784,727

***Basic Allotment: $5,140; AISD Yield: $77.53; Equalized Wealth: $514,000 per WADA**

QTP= Qualifying Time Period
VL= Value Limitation
VP= Viable Presence

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	Recapture Costs	Additional Local M&O Collections	State Aid From Additional M&O Tax Collections	Recapture from the Additional Local Tax Effort	Homestead Hold Harmless	Other State Aid	Total General Fund
QTP0	2020-21	$25,265	$0	$0	-$21,493	$1,011	$0	$0	$1	$0	$4,784
QTP1	2021-22	$25,264	$0	$0	-$23,345	$1,011	$0	$0	$1	$0	$2,931
QTP2	2022-23	$25,265	$0	$0	-$22,519	$1,010	$0	$0	$1	$0	$3,758
VL1	2023-24	-$48,264,847	$0	$0	$43,327,867	-$1,930,593	$0	$0	-$2,788	$0	-$6,870,360
VL2	2024-25	-$51,877,687	$0	$0	$51,563,234	-$2,075,107	$0	$0	-$2,996	$0	-$2,392,556
VL3	2025-26	-$48,600,237	$0	$0	$48,743,246	-$1,944,009	$0	$0	-$2,807	$0	-$1,803,807
VL4	2026-27	-$45,496,667	$0	$0	$45,640,333	-$1,819,866	$0	$0	-$2,628	$0	-$1,678,828
VL5	2027-28	-$42,558,167	$0	$0	$42,702,497	-$1,702,326	$0	$0	-$2,458	$0	-$1,560,454
VL6	2028-29	-$39,776,337	$0	$0	$39,921,339	-$1,591,053	$0	$0	-$2,297	$0	-$1,448,349
VL7	2029-30	-$37,143,167	$0	$0	$49,258,182	-$1,485,727	$0	$0	-$2,145	$0	$10,627,143
VL8	2030-31	-$34,651,107	$0	$0	$35,213,110	-$1,386,044	$0	$0	-$2,001	$0	-$826,043
VL9	2031-32	-$32,292,957	$0	$0	$32,313,237	-$1,291,718	$0	$0	-$1,865	$0	-$1,273,304
VL10	2032-33	-$30,061,877	$0	$0	$30,083,367	-$1,202,475	$0	$0	-$1,736	$0	-$1,182,721
VP1	2033-34	$0	$0	$0	$1,855,292	$0	$0	$0	$0	$0	$1,855,292
VP2	2034-35	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
VP3	2035-36	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
VP4	2036-37	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
VP5	2037-38	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0

QTP=	Qualifying Time Period
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VP=	Viable Presence

M&O Impact on the Taxpayer

Table 5 summarizes the impact of the property value limitation in terms of the potential tax savings to the taxpayer under the property value limitation agreement. The focus of this table is on the M&O tax rate only. A $1.04 per $100 M&O tax rate is assumed in 2015-16 (the most recent year available) and thereafter.

Under the assumptions used here, the potential tax savings from the value limitation total $427.2 million over the life of the agreement. The SPISD revenue losses are expected to total approximately $19.0 million over the course of the agreement. In total, the potential net tax benefits (after hold-harmless payments are made) are estimated to total $408.1 million, prior to any negotiations with Port Arthur LNG on supplemental payments.

Table 5 - Estimated Financial Impact of the Port Arthur LNG Project Property Value Limitation Request Submitted to SPISD at $1.04 per $100 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	School District Revenue Losses	Estimated Net Tax Benefits
QTP0	2020-21	$427,614,680	$427,614,680	$0	$1.040	$4,447,193	$4,447,193	$0	$0	$0
QTP1	2021-22	$1,589,976,680	$1,589,976,680	$0	$1.040	$16,535,757	$16,535,757	$0	$0	$0
QTP2	2022-23	$2,911,238,680	$2,911,238,680	$0	$1.040	$30,276,882	$30,276,882	$0	$0	$0
VL1	2023-24	$4,856,484,680	$30,000,000	$4,826,484,680	$1.040	$50,507,441	$312,000	$50,195,441	-$6,870,360	$43,325,080
VL2	2024-25	$5,217,768,680	$30,000,000	$5,187,768,680	$1.040	$54,264,794	$312,000	$53,952,794	-$2,392,556	$51,560,238
VL3	2025-26	$4,890,023,680	$30,000,000	$4,860,023,680	$1.040	$50,856,246	$312,000	$50,544,246	-$1,803,807	$48,740,439
VL4	2026-27	$4,579,666,680	$30,000,000	$4,549,666,680	$1.040	$47,628,533	$312,000	$47,316,533	-$1,678,828	$45,637,706
VL5	2027-28	$4,285,816,680	$30,000,000	$4,255,816,680	$1.040	$44,572,493	$312,000	$44,260,493	-$1,560,454	$42,700,040
VL6	2028-29	$4,007,633,680	$30,000,000	$3,977,633,680	$1.040	$41,679,390	$312,000	$41,367,390	-$1,448,349	$39,919,041
VL7	2029-30	$3,744,316,680	$30,000,000	$3,714,316,680	$1.040	$38,940,893	$312,000	$38,628,893	$0	$38,628,893
VL8	2030-31	$3,495,110,680	$30,000,000	$3,465,110,680	$1.040	$36,349,151	$312,000	$36,037,151	-$826,043	$35,211,108
VL9	2031-32	$3,259,295,680	$30,000,000	$3,229,295,680	$1.040	$33,896,675	$312,000	$33,584,675	-$1,273,304	$32,311,372
VL10	2032-33	$3,036,187,680	$30,000,000	$3,006,187,680	$1.040	$31,576,352	$312,000	$31,264,352	-$1,182,721	$30,081,631
VP1	2033-34	$2,825,137,680	$2,825,137,680	$0	$1.040	$29,381,432	$29,381,432	$0	$0	$0
VP2	2034-35	$2,625,527,680	$2,625,527,680	$0	$1.040	$27,305,488	$27,305,488	$0	$0	$0
VP3	2035-36	$2,436,774,680	$2,436,774,680	$0	$1.040	$25,342,457	$25,342,457	$0	$0	$0
VP4	2036-37	$2,258,322,680	$2,258,322,680	$0	$1.040	$23,486,556	$23,486,556	$0	$0	$0
VP5	2037-38	$2,089,641,680	$2,089,641,680	$0	$1.040	$21,732,273	$21,732,273	$0	$0	$0
						$587,797,058	$160,645,088	$427,151,970	-$19,036,421	$408,115,549

QTP= Qualifying Time Period
VL= Value Limitation
VP= Viable Presence

I&S Funding Impact on School District

The project remains fully taxable for debt services taxes, with SPISD currently levying a $0.1727 per $100 I&S rate. While the value of the Port Arthur LNG project is expected to depreciate over the life of the agreement and beyond, local taxpayers should see a significant benefit from the addition of the Port Arthur LNG project to the local I&S tax roll.

The project is not expected to affect SPISD in terms of enrollment. Continued expansion of the project and related development could result in additional employment and housing in the area and an increase in the school-age population, but this project is unlikely to have much impact on a stand-alone basis.

Note: School district revenue-loss estimates are subject to change based on numerous factors, including:

- **Legislative and Texas Education Agency administrative changes to the underlying school finance formulas used in these calculations.**
- **Legislative changes addressing property value appraisals and exemptions.**
- **Year-to-year appraisals of project values and district taxable values.**
- **Changes in school district tax rates and student enrollment.**