



GLENN HEGAR TEXAS COMPTROLLER OF PUBLIC ACCOUNTS

P.O. Box 13528 • Austin, TX 78711-3528

December 18, 2019

Yliana Gonzalez
Superintendent
Ramirez Common School District
10492 School Street
Realitos, TX 78834

Re: Certificate for Limitation on Appraised Value of Property for School District Maintenance and Operations taxes by and between Ramirez Common School District and Dove Run Solar Project, LLC, Application 1413

Dear Superintendent Gonzalez:

On November 19, 2019, the Comptroller issued written notice that Dove Run Solar, Project, LLC (applicant) submitted a completed application (Application 1413) for a limitation on appraised value under the provisions of Tax Code Chapter 313.¹ This application was originally submitted on June 20, 2019, to the Ramirez Common School District (school district) by the applicant.

This presents the results of the Comptroller's review of the application and determinations required:

- 1) under Section 313.025(h) to determine if the property meets the requirements of Section 313.024 for eligibility for a limitation on appraised value under Chapter 313, Subchapter C; and
- 2) under Section 313.025(d), to issue a certificate for a limitation on appraised value of the property and provide the certificate to the governing body of the school district or provide the governing body a written explanation of the Comptroller's decision not to issue a certificate, using the criteria set out in Section 313.026.

Determination required by 313.025(h)

Sec. 313.024(a) Applicant is subject to tax imposed by Chapter 171.
Sec. 313.024(b) Applicant is proposing to use the property for an eligible project.

¹ All Statutory references are to the Texas Tax Code, unless otherwise noted.

Sec. 313.024(d) Applicant has requested a waiver to create the required number of new qualifying jobs and pay all jobs created that are not qualifying jobs a wage that exceeds the county average weekly wage for all jobs in the county where the jobs are located.

Sec. 313.024(d-2) Not applicable to Application 1413.

Based on the information provided by the applicant, the Comptroller has determined that the property meets the requirements of Section 313.024 for eligibility for a limitation on appraised value under Chapter 313, Subchapter C.

Certificate decision required by 313.025(d)

Determination required by 313.026(c)(1)

The Comptroller has determined that the project proposed by the applicant is reasonably likely to generate tax revenue in an amount sufficient to offset the school district's maintenance and operations *ad valorem tax* revenue lost as a result of the agreement before the 25th anniversary of the beginning of the limitation period, see Attachment B.

Determination required by 313.026(c)(2)

The Comptroller has determined that the limitation on appraised value is a determining factor in the applicant's decision to invest capital and construct the project in this state, see Attachment C.

Based on these determinations, the Comptroller issues a certificate for a limitation on appraised value. This certificate is contingent on the school district's receipt and acceptance of the Texas Education Agency's determination per 313.025(b-1).

The Comptroller's review of the application assumes the accuracy and completeness of the statements in the application. If the application is approved by the school district, the applicant shall perform according to the provisions of the Texas Economic Development Act Agreement (Form 50-826) executed with the school district. The school district shall comply with and enforce the stipulations, provisions, terms, and conditions of the agreement, applicable Texas Administrative Code and Chapter 313, per TAC 9.1054(i)(3).

This certificate is no longer valid if the application is modified, the information presented in the application changes, or the limitation agreement does not conform to the application. Additionally, this certificate is contingent on the school district approving and executing the agreement within a year from the date of this letter.

Note that any building or improvement existing as of the application review start date of November 19, 2019, or any tangible personal property placed in service prior to that date may not become "Qualified Property" as defined by 313.021(2) and the Texas Administrative Code.

Should you have any questions, please contact Will Counihan, Director, Data Analysis & Transparency, by email at will.counihan@cpa.texas.gov or by phone toll-free at 1-800-531-5441, ext. 6-0758, or at 512-936-0758.

Sincerely,

A handwritten signature in cursive script that reads "Lisa Craven".

Lisa Craven
Deputy Comptroller

Enclosure

cc: Will Counihan

CORRECTED - Attachment A – Economic Impact Analysis

The following tables summarize the Comptroller’s economic impact analysis of Dove Run Solar Project, LLC (project) applying to Ramirez Common School District (district), as required by Tax Code, 313.026 and Texas Administrative Code 9.1055(d)(2).

Table 1 is a summary of investment, employment and tax impact of Dove Run Solar Project, LLC.

Applicant	Dove Run Solar Project, LLC
Tax Code, 313.024 Eligibility Category	Renewable Energy - Solar
School District	Ramirez Common SD
2018-2019 Average Daily Attendance	23
County	Duval
Proposed Total Investment in District	\$121,800,000
Proposed Qualified Investment	\$121,800,000
Limitation Amount	\$15,000,000
Qualifying Time Period (Full Years)	2022-2023
Number of new qualifying jobs committed to by applicant	2*
Number of new non-qualifying jobs estimated by applicant	0
Average weekly wage of qualifying jobs committed to by applicant	\$1,255
Minimum weekly wage required for each qualifying job by Tax Code, 313.021(5)(B)	\$1,255
Minimum annual wage committed to by applicant for qualified jobs	\$65,250
Minimum weekly wage required for non-qualifying jobs	\$744
Minimum annual wage required for non-qualifying jobs	\$38,663
Investment per Qualifying Job	\$60,900,00
Estimated M&O levy without any limit (15 years)	\$8,742,804
Estimated M&O levy with Limitation (15 years)	\$2,636,460
Estimated gross M&O tax benefit (15 years)	\$6,106,344

* Applicant is requesting district to waive requirement to create minimum number of qualifying jobs pursuant to Tax Code, 313.025 (f-1).

Table 2 is the estimated statewide economic impact of Dove Run Solar Project, LLC (modeled).

Year	Employment			Personal Income		
	Direct	Indirect + Induced	Total	Direct	Indirect + Induced	Total
2022	200	148	348	\$5,207,400	\$15,792,600	\$21,000,000
2023	1	474	475	\$65,250	\$35,934,750	\$36,000,000
2024	1	19	20	\$65,250	\$5,934,750	\$6,000,000
2025	1	5	6	\$65,250	\$2,934,750	\$3,000,000
2026	1	(7)	-6	\$65,250	\$1,934,750	\$2,000,000
2027	1	(11)	-10	\$65,250	\$934,750	\$1,000,000
2028	1	(13)	-12	\$65,250	-\$65,250	\$0
2029	1	(13)	-12	\$65,250	-\$65,250	\$0
2030	1	(9)	-8	\$65,250	-\$65,250	\$0
2031	1	(9)	-8	\$65,250	-\$65,250	\$0
2032	1	(5)	-4	\$65,250	-\$65,250	\$0
2033	1	(3)	-2	\$65,250	-\$65,250	\$0
2034	1	1	2	\$65,250	-\$65,250	\$0
2035	1	(1)	0	\$65,250	-\$65,250	\$0

Source: CPA REMI, Dove Run Solar Project, LLC

Table 3 examines the estimated direct impact on ad valorem taxes to the region if all taxes are assessed.

Year	Estimated Taxable Value for I&S	Estimated Taxable Value for M&O	Tax Rate*	Ramirez CSD ISD I&S Tax Levy	Ramirex CSD M&O Tax Levy	Ramirez CSD M&O and I&S Tax Levies	Duval County Tax Levy	Estimated Total Property Taxes
			0.0000		0.9700		0.9148	
2024	\$121,800,000	\$121,800,000		\$0	\$1,181,460	\$1,181,460	\$1,114,201	\$2,295,661
2025	\$112,056,000	\$112,056,000		\$0	\$1,086,943	\$1,086,943	\$1,025,065	\$2,112,008
2026	\$102,312,000	\$102,312,000		\$0	\$992,426	\$992,426	\$935,929	\$1,928,355
2027	\$92,568,000	\$92,568,000		\$0	\$897,910	\$897,910	\$846,793	\$1,744,702
2028	\$82,824,000	\$82,824,000		\$0	\$803,393	\$803,393	\$757,657	\$1,561,049
2029	\$73,080,000	\$73,080,000		\$0	\$708,876	\$708,876	\$668,520	\$1,377,396
2030	\$63,336,000	\$63,336,000		\$0	\$614,359	\$614,359	\$579,384	\$1,193,744
2031	\$53,592,000	\$53,592,000		\$0	\$519,842	\$519,842	\$490,248	\$1,010,091
2032	\$43,848,000	\$43,848,000		\$0	\$425,326	\$425,326	\$401,112	\$826,438
2033	\$34,104,000	\$34,104,000		\$0	\$330,809	\$330,809	\$311,976	\$642,785
2034	\$24,360,000	\$24,360,000		\$0	\$236,292	\$236,292	\$222,840	\$459,132
2035	\$24,360,000	\$24,360,000		\$0	\$236,292	\$236,292	\$222,840	\$459,132
2036	\$24,360,000	\$24,360,000		\$0	\$236,292	\$236,292	\$222,840	\$459,132
2037	\$24,360,000	\$24,360,000		\$0	\$236,292	\$236,292	\$222,840	\$459,132
2038	\$24,360,000	\$24,360,000		\$0	\$236,292	\$236,292	\$222,840	\$459,132
			Total	\$0	\$8,742,804	\$8,742,804	\$8,245,086	\$16,987,890

Source: CPA, Dove Run Solar Project, LLC

*Tax Rate per \$100 Valuation

Table 4 examines the estimated direct impact on ad valorem taxes to the school district and Duval County, with all property tax incentives sought being granted using estimated market value from the application. The project has applied for a value limitation under Chapter 313, Tax Code and tax abatement with the county.

The difference noted in the last line is the difference between the totals in Table 3 and Table 4.

Year	Estimated Taxable Value for I&S	Estimated Taxable Value for M&O		Ramirez CSD ISD I&S Tax Levy	Ramirex CSD M&O Tax Levy	Ramirez CSD M&O and I&S Tax Levies	Duval County Tax Levy	Estimated Total Property Taxes
			Tax Rate*	0.0000	0.9700		0.9148	
2024	\$121,800,000	\$15,000,000		\$0	\$145,500	\$145,500	\$167,130	\$312,630
2025	\$112,056,000	\$15,000,000		\$0	\$145,500	\$145,500	\$153,760	\$299,260
2026	\$102,312,000	\$15,000,000		\$0	\$145,500	\$145,500	\$140,389	\$285,889
2027	\$92,568,000	\$15,000,000		\$0	\$145,500	\$145,500	\$127,019	\$272,519
2028	\$82,824,000	\$15,000,000		\$0	\$145,500	\$145,500	\$113,648	\$259,148
2029	\$73,080,000	\$15,000,000		\$0	\$145,500	\$145,500	\$100,278	\$245,778
2030	\$63,336,000	\$15,000,000		\$0	\$145,500	\$145,500	\$86,908	\$232,408
2031	\$53,592,000	\$15,000,000		\$0	\$145,500	\$145,500	\$73,537	\$219,037
2032	\$43,848,000	\$15,000,000		\$0	\$145,500	\$145,500	\$60,167	\$205,667
2033	\$34,104,000	\$15,000,000		\$0	\$145,500	\$145,500	\$46,796	\$192,296
2034	\$24,360,000	\$24,360,000		\$0	\$236,292	\$236,292	\$222,840	\$459,132
2035	\$24,360,000	\$24,360,000		\$0	\$236,292	\$236,292	\$222,840	\$459,132
2036	\$24,360,000	\$24,360,000		\$0	\$236,292	\$236,292	\$222,840	\$459,132
2037	\$24,360,000	\$24,360,000		\$0	\$236,292	\$236,292	\$222,840	\$459,132
2038	\$24,360,000	\$24,360,000		\$0	\$236,292	\$236,292	\$222,840	\$459,132
			Total	\$0	\$2,636,460	\$2,636,460	\$2,183,834	\$4,820,294
			Diff	\$0	\$6,106,344	\$6,106,344	\$6,061,252	\$12,167,596

Source: CPA, Dove Run Solar Project, LLC

*Tax Rate per \$100 Valuation

Disclaimer: This examination is based on information from the application submitted to the school district and forwarded to the comptroller. It is intended to meet the statutory requirement of Chapter 313 of the Tax Code and is not intended for any other purpose.

Attachment B – Tax Revenue before 25th Anniversary of Limitation Start

This represents the Comptroller’s determination that Dove Run Solar Project (project) is reasonably likely to generate, before the 25th anniversary of the beginning of the limitation period, tax revenue in an amount sufficient to offset the school district maintenance and operations ad valorem tax revenue lost as a result of the agreement. This evaluation is based on an analysis of the estimated M&O portion of the school district property tax levy and direct, indirect and induced tax effects from project employment directly related to this project, using estimated taxable values provided in the application.

	Tax Year	Estimated ISD M&O Tax Levy Generated (Annual)	Estimated ISD M&O Tax Levy Generated (Cumulative)	Estimated ISD M&O Tax Levy Loss as Result of Agreement (Annual)	Estimated ISD M&O Tax Levy Loss as Result of Agreement (Cumulative)
Limitation Pre-Years	2021	\$0	\$0	\$0	\$0
	2022	\$0	\$0	\$0	\$0
	2023	\$0	\$0	\$0	\$0
Limitation Period (10 Years)	2024	\$145,500	\$145,500	\$1,035,960	\$1,035,960
	2025	\$145,500	\$291,000	\$941,443	\$1,977,403
	2026	\$145,500	\$436,500	\$846,926	\$2,824,330
	2027	\$145,500	\$582,000	\$752,410	\$3,576,739
	2028	\$145,500	\$727,500	\$657,893	\$4,234,632
	2029	\$145,500	\$873,000	\$563,376	\$4,798,008
	2030	\$145,500	\$1,018,500	\$468,859	\$5,266,867
	2031	\$145,500	\$1,164,000	\$374,342	\$5,641,210
	2032	\$145,500	\$1,309,500	\$279,826	\$5,921,035
	2033	\$145,500	\$1,455,000	\$185,309	\$6,106,344
Maintain Viable Presence (5 Years)	2034	\$236,292	\$1,691,292	\$0	\$6,106,344
	2035	\$236,292	\$1,927,584	\$0	\$6,106,344
	2036	\$236,292	\$2,163,876	\$0	\$6,106,344
	2037	\$236,292	\$2,400,168	\$0	\$6,106,344
	2038	\$236,292	\$2,636,460	\$0	\$6,106,344
Additional Years as Required by 313.026(c)(1) (10 Years)	2039	\$236,292	\$2,872,752	\$0	\$6,106,344
	2040	\$236,292	\$3,109,044	\$0	\$6,106,344
	2041	\$236,292	\$3,345,336	\$0	\$6,106,344
	2042	\$236,292	\$3,581,628	\$0	\$6,106,344
	2043	\$236,292	\$3,817,920	\$0	\$6,106,344
	2044	\$236,292	\$4,054,212	\$0	\$6,106,344
	2045	\$236,292	\$4,290,504	\$0	\$6,106,344
	2046	\$236,292	\$4,526,796	\$0	\$6,106,344
	2047	\$236,292	\$4,763,088	\$0	\$6,106,344
	2048	\$236,292	\$4,999,380	\$0	\$6,106,344

\$4,999,380 is less than **\$6,106,344**

Analysis Summary	
Is the project reasonably likely to generate tax revenue in an amount sufficient to offset the M&O levy loss as a result of the limitation agreement?	No

Source: CPA, Dove Run Solar Project, LLC

Year	Employment			Personal Income			Revenue & Expenditure		
	Direct	Indirect + Induced	Total	Direct	Indirect + Induced	Total	Revenue	Expenditure	Net Tax Effect
2022	200	148	348	\$5,207,400	\$15,792,600	\$21,000,000	1050000	-650000	\$1,700,000
2023	1	474	475	\$65,250	\$35,934,750	\$36,000,000	4090000	-630000	\$4,720,000
2024	1	19	20	\$65,250	\$5,934,750	\$6,000,000	300000	570000	-\$270,000
2025	1	5	6	\$65,250	\$2,934,750	\$3,000,000	200000	580000	-\$380,000
2026	1	(7)	-6	\$65,250	\$1,934,750	\$2,000,000	180000	560000	-\$380,000
2027	1	(11)	-10	\$65,250	\$934,750	\$1,000,000	140000	530000	-\$390,000
2028	1	(13)	-12	\$65,250	-\$65,250	\$0	130000	500000	-\$370,000
2029	1	(13)	-12	\$65,250	-\$65,250	\$0	140000	470000	-\$330,000
2030	1	(9)	-8	\$65,250	-\$65,250	\$0	140000	430000	-\$290,000
2031	1	(9)	-8	\$65,250	-\$65,250	\$0	110000	420000	-\$310,000
2032	1	(5)	-4	\$65,250	-\$65,250	\$0	110000	410000	-\$300,000
2033	1	(3)	-2	\$65,250	-\$65,250	\$0	90000	350000	-\$260,000
2034	1	1	2	\$65,250	-\$65,250	\$0	80000	310000	-\$230,000
2035	1	(1)	0	\$65,250	-\$65,250	\$0	60000	280000	-\$220,000
2036	1	3	4	\$65,250	-\$65,250	\$0	60000	240000	-\$180,000
2037	1	3	4	\$65,250	-\$65,250	\$0	20000	190000	-\$170,000
2038	1	1	2	\$65,250	-\$65,250	\$0	30000	190000	-\$160,000
2039	1	5	6	\$65,250	-\$65,250	\$0	20000	150000	-\$130,000
2040	1	3	4	\$65,250	-\$65,250	\$0	-20000	90000	-\$110,000
2041	1	9	10	\$65,250	\$934,750	\$1,000,000	0	80000	-\$80,000
2042	1	3	4	\$65,250	-\$65,250	\$0	-20000	100000	-\$120,000
2043	1	1	2	\$65,250	\$934,750	\$1,000,000	30000	110000	-\$80,000
2044	1	3	4	\$65,250	\$1,934,750	\$2,000,000	80000	110000	-\$30,000
2045	1	7	8	\$65,250	\$1,934,750	\$2,000,000	60000	50000	\$10,000
2046	1	9	10	\$65,250	\$1,934,750	\$2,000,000	140000	80000	\$60,000
Total							\$7,220,000	\$5,520,000	\$1,700,000
							\$6,699,380	is greater than	\$6,106,144
Analysis Summary									
Is the project reasonably likely to generate tax revenue in an amount sufficient to offset the M&O levy loss as a result of the limitation agreement?									Yes

Disclaimer: This examination is based on information from the application submitted to the school district and forwarded to the comptroller. It is intended to meet the statutory requirement of Chapter 313 of the Tax Code and is not intended for any other purpose.

Attachment C – Limitation as a Determining Factor

Tax Code 313.026 states that the Comptroller may not issue a certificate for a limitation on appraised value under this chapter for property described in an application unless the comptroller determines that “the limitation on appraised value is a determining factor in the applicant's decision to invest capital and construct the project in this state.” This represents the basis for the Comptroller’s determination.

Methodology

Texas Administrative Code 9.1055(d) states the Comptroller shall review any information available to the Comptroller including:

- the application, including the responses to the questions in Section 8 (Limitation as a Determining Factor);
- public documents or statements by the applicant concerning business operations or site location issues or in which the applicant is a subject;
- statements by officials of the applicant, public documents or statements by governmental or industry officials concerning business operations or site location issues;
- existing investment and operations at or near the site or in the state that may impact the proposed project;
- announced real estate transactions, utility records, permit requests, industry publications or other sources that may provide information helpful in making the determination; and
- market information, raw materials or other production inputs, availability, existing facility locations, committed incentives, infrastructure issues, utility issues, location of buyers, nature of market, supply chains, other known sites under consideration.

Determination

The Comptroller **has determined** that the limitation on appraised value is a determining factor in the Dove Run Solar Project, LLC’s (Savion, LLC is the parent company of Dove Run Solar Project, LLC) decision to invest capital and construct the project in this state. This is based on information available, including information provided by the applicant. Specifically, the comptroller notes the following:

- Savion LLC in Tab 5 of their Application for a Limitation on Appraised Value:
 - A. “Savion’s management team is uniquely qualified to develop and construct PV solar energy projects in the United States with favorable solar energy resources. With a combined 15+ years of experience in the renewable energy industries, the Savion team has a proven track record of developing, financing, and constructing large -scale renewable energy projects. Based on this experience, the management team evaluates all potential projects for feasibility, finance-ability, and the economic return they represent in comparison to other project opportunities both outside the State of Texas as well as within the State of Texas. Without a Value Limitation program, Savion would seek to move to alternative sites outside of the State of Texas.”
 - B. “A 313 Limitation of Appraised Value Agreement is a vital tax incentive necessary to ensure the Project is on a level playing field with other solar energy projects with similar incentives. Without the requested limitation the Project will be unable to generate sufficient operating margins and next income to produce economically competitive energy and associate return necessary to attract tax and sponsor equity investment.”
- Savion LLC in Tab 4 of their Application for a Limitation on Appraised Value:
 - A. “Dove Run Solar Project, LLC (“Dove Run”), is the project entity formed to facilitate the development of a utility-scale photovoltaic (“PV”) solar energy project (“The Project”). Dove Run is a wholly owned subsidiary of Savion, LLC (“Savion”). Savion is one of the most successful independent renewable energy development companies in the U.S., with over 56 full-time employees. Savion’s team of subject matter experts in solar resources analysis, mapping systems, environmental studies, permitting, land acquisition, and power marketing places a unique emphasis on the development craft, which is unparalleled in the U.S. renewable energy market. Savion has developed over 11.2 gigawatts of solar energy facilities across 130 projects, which are either operating, in-construction, or contracted to be in constructed.”

- B. "Dove Run has invested additional capital in interconnection studies with ERCOT, environmental and wildlife studies, and in leasing land for the Project. Should the Appraised Value Limitation be granted, Dove Run has created a development and investment plan that is capitalized to implement the Project. Without such a limitation, the Project, competing against other Texas projects that have qualified, would likely be forced to redeploy its assets and capital to other state competing for similar solar energy projects."

Supporting Information

- a) Section 8 of the Application for a Limitation on Appraised Value
- b) Attachments provided in Tab 5 of the Application for a Limitation on Appraised Value
- c) Additional information provided by the Applicant or located by the Comptroller

Disclaimer: This examination is based on information from the application submitted to the school district and forwarded to the comptroller. It is intended to meet the statutory requirement of Chapter 313 of the Tax Code and is not intended for any other purpose.

Supporting Information

**Section 8 of the Application for
a Limitation on Appraised Value**

SECTION 6: Eligibility Under Tax Code Chapter 313.024

1. Are you an entity subject to the tax under Tax Code, Chapter 171? Yes No
2. The property will be used for one of the following activities:
 - (1) manufacturing Yes No
 - (2) research and development Yes No
 - (3) a clean coal project, as defined by Section 5.001, Water Code Yes No
 - (4) an advanced clean energy project, as defined by Section 382.003, Health and Safety Code Yes No
 - (5) renewable energy electric generation Yes No
 - (6) electric power generation using integrated gasification combined cycle technology Yes No
 - (7) nuclear electric power generation Yes No
 - (8) a computer center that is used as an integral part or as a necessary auxiliary part for the activity conducted by applicant in one or more activities described by Subdivisions (1) through (7) Yes No
 - (9) a Texas Priority Project, as defined by 313.024(e)(7) and TAC 9.1051 Yes No
3. Are you requesting that any of the land be classified as qualified investment? Yes No
4. Will any of the proposed qualified investment be leased under a capitalized lease? Yes No
5. Will any of the proposed qualified investment be leased under an operating lease? Yes No
6. Are you including property that is owned by a person other than the applicant? Yes No
7. Will any property be pooled or proposed to be pooled with property owned by the applicant in determining the amount of your qualified investment? Yes No

SECTION 7: Project Description

1. In **Tab 4**, attach a detailed description of the scope of the proposed project, including, at a minimum, the type and planned use of real and tangible personal property, the nature of the business, a timeline for property construction or installation, and any other relevant information.
2. Check the project characteristics that apply to the proposed project:

<input checked="" type="checkbox"/> Land has no existing improvements	<input type="checkbox"/> Land has existing improvements (<i>complete Section 13</i>)
<input type="checkbox"/> Expansion of existing operation on the land (<i>complete Section 13</i>)	<input type="checkbox"/> Relocation within Texas

SECTION 8: Limitation as Determining Factor

1. Does the applicant currently own the land on which the proposed project will occur? Yes No
2. Has the applicant entered into any agreements, contracts or letters of intent related to the proposed project? Yes No
3. Does the applicant have current business activities at the location where the proposed project will occur? Yes No
4. Has the applicant made public statements in SEC filings or other documents regarding its intentions regarding the proposed project location? Yes No
5. Has the applicant received any local or state permits for activities on the proposed project site? Yes No
6. Has the applicant received commitments for state or local incentives for activities at the proposed project site? Yes No
7. Is the applicant evaluating other locations not in Texas for the proposed project? Yes No
8. Has the applicant provided capital investment or return on investment information for the proposed project in comparison with other alternative investment opportunities? Yes No
9. Has the applicant provided information related to the applicant's inputs, transportation and markets for the proposed project? Yes No
10. Are you submitting information to assist in the determination as to whether the limitation on appraised value is a determining factor in the applicant's decision to invest capital and construct the project in Texas? Yes No

Chapter 313.026(e) states "the applicant may submit information to the Comptroller that would provide a basis for an affirmative determination under Subsection (c)(2)." If you answered "yes" to any of the questions in Section 8, attach supporting information in Tab 5.

Supporting Information

Attachments provided in Tab 5
of the Application for a
Limitation on Appraised Value

Tab 5

Documentation to assist in determining if limitation is a determining factor.

Chapter 313.026(e) states “the applicant may submit information to the Comptroller that would provide a basis for an affirmative determination under Subsection (c) (2).” If you answered “yes” to any of the questions in Section 8, attach supporting information in Tab 5.

2. Has the applicant entered into any agreements, contracts or letters of intent related to the proposed project?

Dove Run Solar Project, LLC has entered into the following representative agreements and contracts for the development of a project within Ramirez CSD:

- Letters of Intent and Purchase Options covering approximately 1,400 acres;
- Interconnect Studies and Agreement; and
- Third-party contracts for development-related work, such as resource estimation, legal review, and construction planning.

7. Is the applicant evaluating other locations not in Texas for the proposed project?

Yes. Savion’s management team is uniquely qualified to develop and construct PV solar energy projects in the United States with favorable solar energy resource. With a combined 15+ years of experience in the renewable energy industries, the Savion team has a proven track record of developing, financing, and constructing large-scale renewable energy projects. Our collective experience includes over 11.2 gigawatts of solar projects. Based on this experience, the management team evaluates all potential projects for feasibility, finance-ability, and the economic returns they represent in comparison to other project opportunities both OUTSIDE the State of Texas as well as WITHIN the State of Texas. Other locations being evaluated include, but are not limited to:

Colorado	Indiana
Florida	New Mexico
Georgia	South Carolina
Illinois	Wisconsin
Kansas	Oklahoma
Arkansas	Louisiana
Alabama	Mississippi
Kentucky	Virginia
Michigan	New York
Pennsylvania	

For these reasons, Savion studies various competing sites throughout the market areas outside and inside the State of Texas where solar energy development is attractive. Without a Value Limitation program, Savion would seek to move to alternative sites OUTSIDE of the State of Texas.

Dove Run Solar Project, LLC is currently in a period of evaluation to determine whether the identified site in Ramirez CSD represents the best location or whether redeployment of its development resources and capital to other power markets in the United States is more advisable. As such, the development resources necessary to advance the planned 101.5 MW Dove Run could be redeployed to other renewable energy development projects in other power markets in the United States.

Therefore, a 313 Limitation of Appraised Value Agreement is a vital tax incentive necessary to ensure the Project is on a level playing field with other solar energy projects with similar incentives. Without the requested limitation, the Project will be unable to generate sufficient operating margins and net income to produce economically competitive energy and associate returns necessary to attract tax and sponsor equity investment. Such third-party investment is mandatory to finance the projected capital costs of approximately \$122M needed to purchase solar modules and other infrastructure and to fund the construction of the facility.

10. Are you submitting information to assist in the determination as to whether the limitation on appraised value is a determining factor in the applicant's decision to invest capital and construct the project in Texas?

The information provided in this Attachment and throughout the Application has been assembled to provide the reviewer with the best possible information to make an assessment and determination of the critical nature of the Limitation on Appraised Value to the feasibility of Dove Run Solar Project, LLC.

Supporting Information

Additional information
provided by the Applicant or
located by the Comptroller

COMPTROLLER QUERY RELATED TO TAX CODE CHAPTER 313.026(c)(2)
Ramirez Common School District – Dove Run Solar Project, LLC App. #1413

Comptroller Questions (via email on September 27, 2019 and December 5, 2019):

1. *Is the Dove Run Solar Project, LLC currently known by any other project names?*
2. *Has this project applied to ERCOT at this time? If so, please provide the project's IGNR number and when was it assigned.*
3. *Please also list any other names by which this project may have been known in the past-in media reports, investor presentations, or any listings with any federal or state agency*

Applicant Response (via email on December 5, 2019):

1. *No, the project began & remains to be known as the Dove Run Solar Project.*
2. *21INR0326, assigned in May/June 2019.*
3. *NONE. Only name used is Dove Run Solar Project.*