

**O'HANLON, DEMERATH & CASTILLO**

ATTORNEYS AND COUNSELORS AT LAW

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December 11, 2019

Local Government Assistance & Economic Analysis  
Texas Comptroller of Public Accounts  
P.O. Box 13528  
Austin, Texas 78711-3528

RE: Amendment001 to Roma Independent School District from Starr Solar Ranch LLC

To the Local Government Assistance & Economic Analysis Division:

Enclosed. Please find Amendment001 to Roma Independent School District from Starr Solar Ranch LLC. The following changes have been made:

1. Section 9 – Q4: Please provide month, date and year. – **Updated Date**
2. Section 14 - Q7: TCW has released 2nd quarter wages for 2019 in QCEW. As such, wages for question 7 (a, b and c)) and Tab 13 must be updated to reflect the 4 most recent quarters. – **Corrected Wages**
3. Section 14 – Q 9 & 10: committed wage (b) is not sufficient (off \$1.73). Please adjust. – **Corrected Wages**
4. Map: Please provide an additional map includes ALL of the following: a labeled project boundary, full county and full ISD boundaries, the reinvestment zone, and the qualified property. These should also be reflected in the legend. Recognizable landmarks should be shown (i.e., highways, etc.). I am accepting the original maps turned in with this application, but also need one full map with all these requirements. – **Updated maps**
5. Schedule D: Need percentages in Annual Incentive column. – **Updated Percentages**

A copy of the application will be submitted to the Starr County Appraisal District.

Sincerely,



Kevin O'Hanlon  
School District Consultant

Cc: Starr County Appraisal District  
Starr Solar Ranch LLC

**SECTION 9: Projected Timeline**

- 1. Application approval by school board ..... March 1, 2020
- 2. Commencement of construction ..... Q2 2020
- 3. Beginning of qualifying time period ..... March 1, 2020
- 4. First year of limitation ..... January 1, 2022
- 5. Begin hiring new employees ..... Q3 2021
- 6. Commencement of commercial operations ..... Q3 2021
- 7. Do you propose to construct a new building or to erect or affix a new improvement after your application review start date (*date your application is finally determined to be complete*)? .....  Yes  No  
**Note:** Improvements made before that time may not be considered qualified property.
- 8. When do you anticipate the new buildings or improvements will be placed in service? ..... Q3 2021

**SECTION 10: The Property**

- 1. Identify county or counties in which the proposed project will be located ..... Starr County
- 2. Identify Central Appraisal District (CAD) that will be responsible for appraising the property ..... Starr CAD
- 3. Will this CAD be acting on behalf of another CAD to appraise this property? .....  Yes  No
- 4. List all taxing entities that have jurisdiction for the property, the portion of project within each entity and tax rates for each entity:  
 County: Starr County, .7684 City: \_\_\_\_\_  
(Name, tax rate and percent of project) (Name, tax rate and percent of project)  
 Hospital District: SCMH, .268163 Water District: \_\_\_\_\_  
(Name, tax rate and percent of project) (Name, tax rate and percent of project)  
 Other (describe): South Texas College, .178 Other (describe): Drainage District, .01  
(Name, tax rate and percent of project) (Name, tax rate and percent of project)
- 5. Is the project located entirely within the ISD listed in Section 1? .....  Yes  No  
 5a. If no, attach in **Tab 6** additional information on the project scope and size to assist in the economic analysis.
- 6. Did you receive a determination from the Texas Economic Development and Tourism Office that this proposed project and at least one other project seeking a limitation agreement constitute a single unified project (SUP), as allowed in §313.024(d-2)? .....  Yes  No  
 6a. If yes, attach in **Tab 6** supporting documentation from the Office of the Governor.

**SECTION 11: Investment**

**NOTE:** The minimum amount of qualified investment required to qualify for an appraised value limitation and the minimum amount of appraised value limitation vary depending on whether the school district is classified as Subchapter B or Subchapter C, and the taxable value of the property within the school district. For assistance in determining estimates of these minimums, access the Comptroller's website at [comptroller.texas.gov/economy/local/ch313/](http://comptroller.texas.gov/economy/local/ch313/).

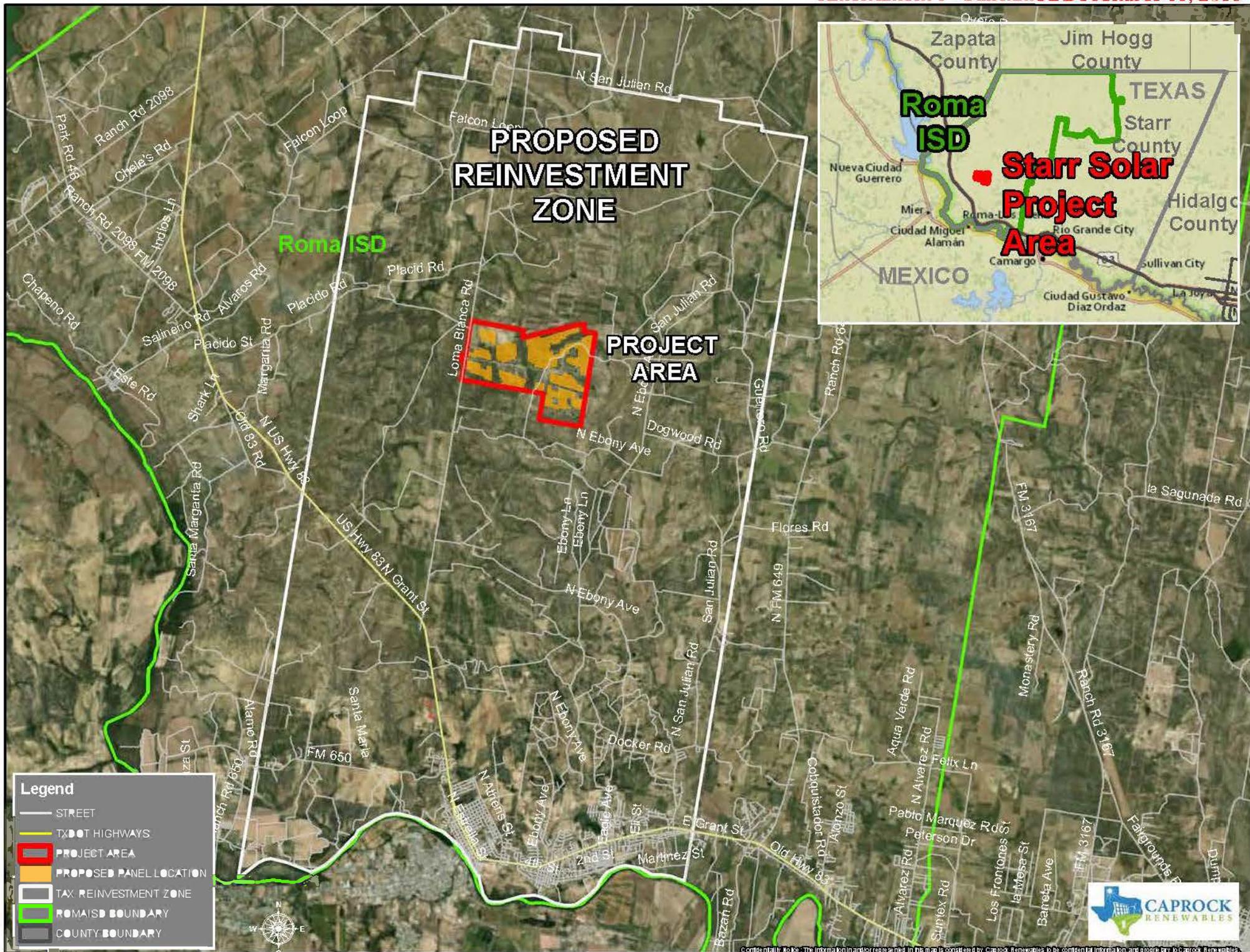
- 1. At the time of application, what is the estimated minimum qualified investment required for this school district? ..... 20,000,000.00
- 2. What is the amount of appraised value limitation for which you are applying? ..... 25,000,000.00  
**Note:** The property value limitation amount is based on property values available at the time of application and may change prior to the execution of any final agreement.
- 3. Does the qualified investment meet the requirements of Tax Code §313.021(1)? .....  Yes  No
- 4. Attach a description of the qualified investment [See §313.021(1).] The description must include:
  - a. a specific and detailed description of the qualified investment you propose to make on the property for which you are requesting an appraised value limitation as defined by Tax Code §313.021 (**Tab 7**);
  - b. a description of any new buildings, proposed new improvements or personal property which you intend to include as part of your minimum qualified investment (**Tab 7**); and
  - c. a detailed map of the qualified investment showing location of tangible personal property to be placed in service during the qualifying time period and buildings to be constructed during the qualifying time period, with vicinity map (**Tab 11**).
- 5. Do you intend to make at least the minimum qualified investment required by Tax Code §313.023 (or §313.053 for Subchapter C school districts) for the relevant school district category during the qualifying time period? .....  Yes  No

SECTION 14: Wage and Employment Information

1. What is the estimated number of permanent jobs (more than 1,600 hours a year), with the applicant or a contractor of the applicant, on the proposed qualified property during the last complete quarter before the application review start date (date your application is finally determined to be complete)? ..... 0
2. What is the last complete calendar quarter before application review start date:  
 First Quarter     Second Quarter     Third Quarter     Fourth Quarter of 2019  
(year)
3. What were the number of permanent jobs (more than 1,600 hours a year) this applicant had in Texas during the most recent quarter reported to the Texas Workforce Commission (TWC)? ..... 0  
**Note:** For job definitions see TAC §9.1051 and Tax Code §313.021(3).
4. What is the number of new qualifying jobs you are committing to create? ..... 1
5. What is the number of new non-qualifying jobs you are estimating you will create? ..... 0
6. Do you intend to request that the governing body waive the minimum new qualifying job creation requirement, as provided under Tax Code §313.025(f-1)? .....  Yes     No
  - 6a. If yes, attach evidence in **Tab 12** documenting that the new qualifying job creation requirement above exceeds the number of employees necessary for the operation, according to industry standards.
7. Attach in **Tab 13** the four most recent quarters of data for each wage calculation below, including documentation from the TWC website. The final actual statutory minimum annual wage requirement for the applicant for each qualifying job — which may differ slightly from this estimate — will be based on information from the four quarterly periods for which data were available at the time of the application review start date (date of a completed application). See TAC §9.1051(21) and (22).
  - a. Average weekly wage for all jobs (all industries) in the county is ..... 588.00
  - b. 110% of the average weekly wage for manufacturing jobs in the county is ..... 4 ~~5~~.00
  - c. 110% of the average weekly wage for manufacturing jobs in the region is ..... 785.00
8. Which Tax Code section are you using to estimate the qualifying job wage standard required for this project? .....  §313.021(5)(A) or  §313.021(5)(B)
9. What is the minimum required annual wage for each qualifying job based on the qualified property? ..... 23,4 ~~3~~.70
10. What is the annual wage you are committing to pay for each of the new qualifying jobs you create on the qualified property? ..... 23,4 3800
11. Will the qualifying jobs meet all minimum requirements set out in Tax Code §313.021(3)? .....  Yes     No
12. Do you intend to satisfy the minimum qualifying job requirement through a determination of cumulative economic benefits to the state as provided by §313.021(3)(F)? .....  Yes     No
  - 12a. If yes, attach in **Tab 12** supporting documentation from the TWC, pursuant to §313.021(3)(F).
13. Do you intend to rely on the project being part of a single unified project, as allowed in §313.024(d-2), in meeting the qualifying job requirements? .....  Yes     No
  - 13a. If yes, attach in **Tab 6** supporting documentation including a list of qualifying jobs in the other school district(s).

SECTION 15: Economic Impact

1. Complete and attach Schedules A1, A2, B, C, and D in **Tab 14**. Note: Excel spreadsheet versions of schedules are available for download and printing at URL listed below.
2. Attach an Economic Impact Analysis, if supplied by other than the Comptroller's Office, in **Tab 15**. (*not required*)
3. If there are any other payments made in the state or economic information that you believe should be included in the economic analysis, attach a separate schedule showing the amount for each year affected, including an explanation, in **Tab 15**.



STARR SOLAR LOCATION, STARR COUNTY



Confidentially Notice: The information and/or represented in this map is considered by Caprock Renewables to be confidential information and property to Caprock Renewables.

TAB 13

Wage Requirement Calculation

**1. Average Weekly Wages for All Jobs (All Industries) in STARR County, Q3 - Q4 2018, & Q1 - Q2 2019**

Category	Area	Period	Avg. Weekly Wage
All Industries	STARR County	Q3 2018	\$578
All Industries	STARR County	Q4 2018	\$617
All Industries	STARR County	Q1 2019	\$578
All Industries	STARR County	Q2 2019	\$579
		AVERAGE	\$588

Quarterly Census of Employment and Wages (QCEW) Report

Customize the report/Help with Accessibility

Drag a column header and drop it here to group by that column

Year	Period	Area	Ownership	Industry Code	Industry	Average Weekly Wage
2018	01	Starr	Total All	10	Total, All Industries	578
2018	02	Starr	Total All	10	Total, All Industries	559
2018	03	Starr	Total All	10	Total, All Industries	578
2018	04	Starr	Total All	10	Total, All Industries	617
2019	01	Starr	Total All	10	Total, All Industries	578
2019	02	Starr	Total All	10	Total, All Industries	579

**2. 110% of Average Weekly Wages for Manufacturing Jobs in STARR County, Q3 - Q4 2018, & Q1 - Q2 2019**

Category	Area	Period	Avg. Weekly Wage
Manufacturing	STARR County	Q3 2018	\$425
Manufacturing	STARR County	Q4 2018	\$382
Manufacturing	STARR County	Q1 2019	\$421
Manufacturing	STARR County	Q2 2019	\$411
		AVERAGE	\$410
		110% OF AVERAGE	\$451

Quarterly Census of Employment and Wages (QCEW) Report

Customize the report/Help with Accessibility

Drag a column header and drop it here to group by that column

Year	Period	Area	Ownership	Industry Code	Industry	Average Weekly Wage
2018	01	Starr	Private	1013	Manufacturing	392
2018	02	Starr	Private	1013	Manufacturing	406
2018	03	Starr	Private	1013	Manufacturing	425
2018	04	Starr	Private	1013	Manufacturing	382
2019	01	Starr	Private	1013	Manufacturing	421
2019	02	Starr	Private	1013	Manufacturing	411

## TAB 13

## Wage Requirement Calculation

## 3. COG Region Wage Calculation

Year	Region	Annual Wage	Avg. Weekly Wage
2018	South Texas Development Council	\$ 37,088	\$713
		110% OF AVERAGE	\$785

**2018 Manufacturing Average Wages by Council of Government Region  
Wages for All Occupations**

COG	COG Number	Wages	
		Hourly	Annual
Texas		\$27.04	\$56,240
<a href="#">Alamo Area Council of Governments</a>	18	\$22.80	\$47,428
<a href="#">Ark-Tex Council of Governments</a>	5	\$18.73	\$38,962
<a href="#">Brazos Valley Council of Governments</a>	13	\$18.16	\$37,783
<a href="#">Capital Area Council of Governments</a>	12	\$32.36	\$67,318
<a href="#">Central Texas Council of Governments</a>	23	\$19.60	\$40,771
<a href="#">Coastal Bend Council of Governments</a>	20	\$28.52	\$59,318
<a href="#">Concho Valley Council of Governments</a>	10	\$21.09	\$43,874
<a href="#">Deep East Texas Council of Governments</a>	14	\$18.28	\$38,021
<a href="#">East Texas Council of Governments</a>	6	\$21.45	\$44,616
<a href="#">Golden Crescent Regional Planning Commission</a>	17	\$28.56	\$59,412
<a href="#">Heart of Texas Council of Governments</a>	11	\$22.71	\$47,245
<a href="#">Houston-Galveston Area Council</a>	16	\$29.76	\$61,909
<a href="#">Lower Rio Grande Valley Development Council</a>	21	\$17.21	\$35,804
<a href="#">Middle Rio Grande Development Council</a>	24	\$20.48	\$42,604
<a href="#">NORTEX Regional Planning Commission</a>	3	\$25.14	\$52,284
<a href="#">North Central Texas Council of Governments</a>	4	\$27.93	\$58,094
<a href="#">Panhandle Regional Planning Commission</a>	1	\$24.19	\$50,314
<a href="#">Permian Basin Regional Planning Commission</a>	9	\$25.90	\$53,882
<a href="#">Rio Grande Council of Governments</a>	8	\$18.51	\$38,493
<a href="#">South East Texas Regional Planning Commission</a>	15	\$36.26	\$75,430
<a href="#">South Plains Association of Governments</a>	2	\$20.04	\$41,691
<a href="#">South Texas Development Council</a>	19	\$17.83	\$37,088
<a href="#">Texoma Council of Governments</a>	22	\$21.73	\$45,198
<a href="#">West Central Texas Council of Governments</a>	7	\$21.84	\$45,431

Calculated by the Texas Workforce Commission Labor Market and Career Information Department.

Data published: July 2019

Data published annually, next update will be July 31, 2020

Annual wage figure assumes a 40-hour work week.

Note: Data is not supported by the Bureau of Labor Statistics (BLS).

Wage data is produced from Texas Occupational Employment Statistics (OES) data, and is not to be compared to BLS estimates.

Data intended only for use in implementing Chapter 313, Tax Code.

Schedule C: Employment Information

Date 12/10/2019  
 Applicant Name Starr Solar Ranch, LLC  
 ISD Name Roma ISD

Form 50-296A  
 Revised May 2014

				Construction		Non-Qualifying Jobs	Qualifying Jobs	
				Column A	Column B	Column C	Column D	Column E
	Year	School Year (YYYY-YYYY)	Tax Year (Fill in actual tax year) YYYY	Number of Construction FTE's or man-hours (specify)	Average annual wage rates for construction workers	Number of non-qualifying jobs applicant estimates it will create (cumulative)	Number of new qualifying jobs applicant commits to create meeting all criteria of Sec. 313.021(3) (cumulative)	Average annual wage of new qualifying jobs
Each year prior to start of value Limitation Period <small>insert as many rows as necessary</small>	0	2019-2020	2019	0	\$0	0	0	n/a
Each year prior to start of value Limitation Period <small>insert as many rows as necessary</small>	Stub	2020-2021	2020	200 FTE avg; 300 FTE peak	\$50,000	0	0	n/a
Each year prior to start of value Limitation Period <small>insert as many rows as necessary</small>	QTP1	2021-2022	2021	200 FTE avg; 300 FTE peak	\$50,000	0	1	n/a
Value Limitation Period <small>The qualifying time period could overlap the value limitation period.</small>	QTP2/LP1	2022-2023	2022	0	n/a	0	1	\$23,438
	2	2023-2024	2023	0	n/a	0	1	\$23,438
	3	2024-2025	2024	0	n/a	0	1	\$23,438
	4	2025-2026	2025	0	n/a	0	1	\$23,438
	5	2026-2027	2026	0	n/a	0	1	\$23,438
	6	2027-2028	2027	0	n/a	0	1	\$23,438
	7	2028-2029	2028	0	n/a	0	1	\$23,438
	8	2029-2030	2029	0	n/a	0	1	\$23,438
	9	2030-2031	2030	0	n/a	0	1	\$23,438
	10	2031-2032	2031	0	n/a	0	1	\$23,438
Years Following Value Limitation Period	11 through 25	2031-2047	2031-2047	0	n/a	0	1	\$23,438

Notes: See TAC 9.1051 for definition of non-qualifying jobs.  
 Only include jobs on the project site in this school district

C1. Are the cumulative number of qualifying jobs listed in Column D less than the number of qualifying jobs required by statute? (25 qualifying jobs in Subchapter B districts, 10 qualifying jobs in Subchapter C districts)

C1a. Will the applicant request a job waiver as provided under 313.025(f-1)?

C1b. Will the applicant avail itself of the provision in 313.021(3)(F)?

<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No

Schedule D: Other Incentives (Estimated)

Date 12/10/2019  
 Applicant Name Starr Solar Ranch, LLC  
 ISD Name Roma ISD

Form 50-296A  
 Revised May 2014

State and Local Incentives for which the Applicant Intends to apply (Estimated)						
Incentive Description	Taxing Entity (as applicable)	Beginning Year of Benefit	Duration of Benefit	Annual Tax Levy without Incentive	Annual Incentive	Annual Net Tax Levy
Tax Code Chapter 311	County:					
	City:					
	Other:					
Tax Code Chapter 312	County: Starr County	2022	Ten years	\$405,704	36%	\$259,651
	City: n/a					
	Other: Starr County Hospital District	2022	Ten years	\$191,619	45%	\$105,391
Local Government Code Chapters 380/381	County:					
	City:					
	Other:					
Freeport Exemptions						
Non-Annexation Agreements						
Enterprise Zone/Project						
Economic Development Corporation						
Texas Enterprise Fund						
Employee Recruitment						
Skills Development Fund						
Training Facility Space and Equipment						
Infrastructure Incentives						
Permitting Assistance						
Other:						
Other:						
Other:						
Other:						
				\$597,324		\$442,500

Additional information on incentives for this project:

1. Calculations above use estimated Taxable Value for 2022 and current tax rates.

SECTION 16: Authorized Signatures and Applicant Certification

After the application and schedules are complete, an authorized representative from the school district and the business should review the application documents and complete this authorization page. Attach the completed authorization page in Tab 17. NOTE: If you amend your application, you will need to obtain new signatures and resubmit this page, Section 16, with the amendment request.

1. Authorized School District Representative Signature

I am the authorized representative for the school district to which this application is being submitted. I understand that this application is a government record as defined in Chapter 37 of the Texas Penal Code.

print here

Carlos Guzman

Print Name (Authorized School District Representative)

Superintendent

Title

sign here

*Carlos Guzman*

Signature (Authorized School District Representative)

12/10/19

Date

2. Authorized Company Representative (Applicant) Signature and Notarization

I am the authorized representative for the business entity for the purpose of filing this application. I understand that this application is a government record as defined in Chapter 37 of the Texas Penal Code. The information contained in this application and schedules is true and correct to the best of my knowledge and belief.

I hereby certify and affirm that the business entity I represent is in good standing under the laws of the state in which the business entity was organized and that no delinquent taxes are owed to the State of Texas.

print here

Raina Hornaday

Print Name (Authorized Company Representative (Applicant))

General Manager

Title

sign here

Signature (Authorized Company Representative (Applicant))

Date

GIVEN under my hand and seal of office this, the

\_\_\_\_\_ day of \_\_\_\_\_,

Notary Public in and for the State of Texas

(Notary Seal)

My Commission expires: \_\_\_\_\_

If you make a false statement on this application, you could be found guilty of a Class A misdemeanor or a state jail felony under Texas Penal Code Section 37.10.

SECTION 16: Authorized Signatures and Applicant Certification

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print here

Print Name (Authorized School District Representative)

Title

sign here

Signature (Authorized School District Representative)

Date

2. Authorized Company Representative (Applicant) Signature and Notarization

I am the authorized representative for the business entity for the purpose of filing this application. I understand that this application is a government record as defined in Chapter 37 of the Texas Penal Code. The information contained in this application and schedules is true and correct to the best of my knowledge and belief.

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print here

Raina Hornaday

General Manager

Print Name (Authorized Company Representative (Applicant))

Title

sign here

Signature (Authorized Company Representative (Applicant))

Dec 10th, 2019

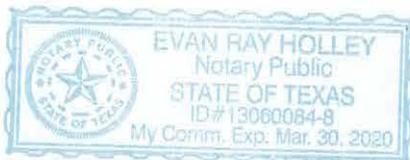
Date

GIVEN under my hand and seal of office this, the

10 day of December, 2019

Notary Public in and for the State of Texas

My Commission expires: Mar 30, 2020



(Notary Seal)

If you make a false statement on this application, you could be found guilty of a Class A misdemeanor or a state jail felony under Texas Penal Code Section 37.10.