

**GLENN HEGAR** TEXAS COMPTROLLER OF PUBLIC ACCOUNTS

---

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

December 18, 2020

AMENDED CERTIFICATION

Eddie Bland  
Superintendent  
Snyder Independent School District  
2901 37th Street  
Snyder, Texas ZIP 79549

Re: Amended Certificate for Limitation on Appraised Value of Property for School District Maintenance and Operations taxes by and between Snyder Independent School District and Canyon Wind Farm, LLC, Application 1442

Dear Superintendent Bland:

This application (Application 1442) was originally submitted on October 10, 2019, to the Snyder Independent School District (school district) by Canyon Wind Farm, LLC (applicant) for a limitation on appraised value under the provisions of Tax Code Chapter 313.<sup>1</sup> On April 2, 2020, the Comptroller issued written notice that the applicant submitted a completed application; and later issued a certificate for a limitation on appraised value on June 19, 2020. The applicant and school district executed an agreement for a limitation on appraised value (agreement) on November 12, 2020.

On November 30, 2020, the Comptroller received an amendment to the agreement to move the limitation from 2022 to 2023; change qualified time period from 2021 to 2022; increase the number of new qualifying jobs from 3 to 4 and increase MW from 87 to 203. This presents the Comptroller's review of that amendment per Section 10.2 of the agreement 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)**

The information provided by the applicant related to eligibility has not changed and therefore, 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.

---

<sup>1</sup> All statutory references are to the Texas Tax Code, unless otherwise noted.

**Certificate decision required by 313.025(d)**

Determination required by 313.026(c)(1)

Based on the amended information provided by the applicant, 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 previously 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.

Based on these determinations, the Comptroller issues a certificate for a limitation on appraised value for the amendment.

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 amendment to the agreement by December 31, 2020.

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

Sincerely,

DocuSigned by:  
  
11EA6DEF0EC441E...

Lisa Craven  
Deputy Comptroller

Enclosure

cc: Will Counihan

### Amended Attachment A - Economic Impact Analysis

The following tables summarize the Comptroller's economic impact analysis of Canyon Wind Farm, LLC (project) applying to Snyder Independent 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 Canyon Wind Farm, LLC.

	<b>Original</b>	<b>Amendment No. 1</b>
Applicant	Canyon Wind Farm, LLC	Canyon Wind Farm, LLC
Tax Code, 313.024 Eligibility Category	Wind	Wind
School District	Snyder ISD	Snyder ISD
2018-2019 Average Daily Attendance	2,460	2,460
County	Scurry	Scurry
Proposed Total Investment in District	\$95,800,000	\$246,350,000
Proposed Qualified Investment	\$95,800,000	\$246,350,000
Limitation Amount	\$30,000,000	\$30,000,000
Qualifying Time Period (Full Years)	2021-2022	2022-2023
Number of new qualifying jobs committed to by applicant	3*	4*
Number of new non-qualifying jobs estimated by applicant	0	0
Average weekly wage of qualifying jobs committed to by applicant	\$962	\$962
Minimum weekly wage required for each qualifying job by Tax Code, 313.021(5)(B)	\$962	\$962
Minimum annual wage committed to by applicant for qualified jobs	\$50,000	\$50,000
Minimum weekly wage required for non-qualifying jobs	\$1,087	\$1,087
Minimum annual wage required for non-qualifying jobs	\$56,525	\$56,525
Investment per Qualifying Job	\$31,933,333	\$82,116,667
Estimated M&O levy without any limit (15 years)	\$8,872,008	\$21,501,277
Estimated M&O levy with Limitation (15 years)	\$5,081,794	\$7,106,726
Estimated gross M&O tax benefit (15 years)	\$3,790,214	\$14,394,551

\* 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 Canyon Wind Farm, LLC (modeled).

Year	Employment			Personal Income		
	Direct	Indirect + Induced	Total	Direct	Indirect + Induced	Total
2021	129	117	246	\$6,446,750	\$10,553,250	\$17,000,000
2022	129	1,070	1199	\$6,446,750	\$78,553,250	\$85,000,000
2023	4	43	47	\$200,000	\$10,800,000	\$11,000,000
2024	4	4	8	\$200,000	\$6,800,000	\$7,000,000
2025	4	(14)	-10	\$200,000	\$2,800,000	\$3,000,000
2026	4	(25)	-21	\$200,000	\$800,000	\$1,000,000
2027	4	(29)	-25	\$200,000	-\$200,000	\$0
2028	4	(29)	-25	\$200,000	-\$200,000	\$0
2029	4	(25)	-21	\$200,000	-\$200,000	\$0
2030	4	(22)	-18	\$200,000	-\$1,200,000	-\$1,000,000
2031	4	(20)	-16	\$200,000	-\$1,200,000	-\$1,000,000
2032	4	(8)	-4	\$200,000	-\$1,200,000	-\$1,000,000
2033	4	(6)	-2	\$200,000	-\$200,000	\$0
2034	4	(6)	-2	\$200,000	-\$200,000	\$0
2035	4	(2)	2	\$200,000	-\$200,000	\$0
2036	4	0	4	\$200,000	-\$200,000	\$0
2037	4	2	6	\$200,000	-\$200,000	\$0

Source: CPA REMI, Canyon Wind Farm, 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		Snyder ISD I&S Tax Levy	Snyder ISD M&O Tax Levy	Snyder ISD M&O and I&S Tax Levies	Scurry County Tax Levy	Scurry County Hospital District Tax Levy	Western TX College Tax Levy	Estimated Total Property Taxes
			Tax Rate*	0.0630	0.9700		0.4498	0.2421	0.2655	
2022	\$2,340,325	\$2,340,325		\$1,474	\$22,701	\$24,176	\$10,527	\$5,666	\$6,214	\$46,582
2023	\$233,798,468	\$233,798,468		\$147,293	\$2,267,845	\$2,415,138	\$1,051,626	\$566,026	\$620,735	\$4,653,525
2024	\$221,487,126	\$221,487,126		\$139,537	\$2,148,425	\$2,287,962	\$996,249	\$536,220	\$588,048	\$4,408,480
2025	\$209,175,785	\$209,175,785		\$131,781	\$2,029,005	\$2,160,786	\$940,873	\$506,415	\$555,362	\$4,163,435
2026	\$196,864,444	\$196,864,444		\$124,025	\$1,909,585	\$2,033,610	\$885,496	\$476,609	\$522,675	\$3,918,390
2027	\$184,553,103	\$184,553,103		\$116,268	\$1,790,165	\$1,906,434	\$830,120	\$446,803	\$489,988	\$3,673,345
2028	\$172,241,761	\$172,241,761		\$108,512	\$1,670,745	\$1,779,257	\$774,743	\$416,997	\$457,302	\$3,428,300
2029	\$159,930,420	\$159,930,420		\$100,756	\$1,551,325	\$1,652,081	\$719,367	\$387,192	\$424,615	\$3,183,255
2030	\$147,619,079	\$147,619,079		\$93,000	\$1,431,905	\$1,524,905	\$663,991	\$357,386	\$391,929	\$2,938,210
2031	\$135,307,738	\$135,307,738		\$85,244	\$1,312,485	\$1,397,729	\$608,614	\$327,580	\$359,242	\$2,693,165
2032	\$122,996,396	\$122,996,396		\$77,488	\$1,193,065	\$1,270,553	\$553,238	\$297,774	\$326,555	\$2,448,120
2033	\$110,685,055	\$110,685,055		\$69,732	\$1,073,645	\$1,143,377	\$497,861	\$267,969	\$293,869	\$2,203,075
2034	\$98,373,714	\$98,373,714		\$61,975	\$954,225	\$1,016,200	\$442,485	\$238,163	\$261,182	\$1,958,030
2035	\$86,062,373	\$86,062,373		\$54,219	\$834,805	\$889,024	\$387,109	\$208,357	\$228,496	\$1,712,985
2036	\$73,751,031	\$73,751,031		\$46,463	\$715,385	\$761,848	\$331,732	\$178,551	\$195,809	\$1,467,941
2037	\$61,439,690	\$61,439,690		\$38,707	\$595,965	\$634,672	\$276,356	\$148,745	\$163,122	\$1,222,896
			<b>Total</b>	<b>\$1,396,475</b>	<b>\$21,501,277</b>	<b>\$22,897,752</b>	<b>\$9,970,386</b>	<b>\$5,366,453</b>	<b>\$5,885,143</b>	<b>\$44,119,734</b>

Source: CPA, Canyon Wind Farm, LLC

\*Tax Rate per \$100 Valuation

**Table 4** examines the estimated direct impact on ad valorem taxes to the school district and Scurry 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		Snyder ISD I&S Tax Levy	Snyder ISD M&O Tax Levy	Snyder ISD M&O and I&S Tax Levies	Scurry County Tax Levy	Scurry County Hospital District Tax Levy	Western TX College Tax Levy	Estimated Total Property Taxes
			Tax Rate*	0.0630	0.9700		0.4498	0.2421	0.2655	
2022	\$2,340,325	\$2,340,325		\$1,474	\$22,701	\$24,176	\$10,527	\$5,666	\$6,214	\$46,582
2023	\$233,798,468	\$30,000,000		\$147,293	\$291,000	\$438,293	\$0	\$0	\$0	\$438,293
2024	\$221,487,126	\$30,000,000		\$139,537	\$291,000	\$430,537	\$0	\$0	\$0	\$430,537
2025	\$209,175,785	\$30,000,000		\$131,781	\$291,000	\$422,781	\$0	\$0	\$0	\$422,781
2026	\$196,864,444	\$30,000,000		\$124,025	\$291,000	\$415,025	\$0	\$0	\$0	\$415,025
2027	\$184,553,103	\$30,000,000		\$116,268	\$291,000	\$407,268	\$0	\$0	\$0	\$407,268
2028	\$172,241,761	\$30,000,000		\$108,512	\$291,000	\$399,512	\$0	\$0	\$0	\$399,512
2029	\$159,930,420	\$30,000,000		\$100,756	\$291,000	\$391,756	\$0	\$0	\$0	\$391,756
2030	\$147,619,079	\$30,000,000		\$93,000	\$291,000	\$384,000	\$0	\$0	\$0	\$384,000
2031	\$135,307,738	\$30,000,000		\$85,244	\$291,000	\$376,244	\$0	\$0	\$0	\$376,244
2032	\$122,996,396	\$30,000,000		\$77,488	\$291,000	\$368,488	\$0	\$0	\$0	\$368,488
2033	\$110,685,055	\$110,685,055		\$69,732	\$1,073,645	\$1,143,377	\$497,861	\$267,969	\$293,869	\$2,203,075
2034	\$98,373,714	\$98,373,714		\$61,975	\$954,225	\$1,016,200	\$442,485	\$238,163	\$261,182	\$1,958,030
2035	\$86,062,373	\$86,062,373		\$54,219	\$834,805	\$889,024	\$387,109	\$208,357	\$228,496	\$1,712,985
2036	\$73,751,031	\$73,751,031		\$46,463	\$715,385	\$761,848	\$331,732	\$178,551	\$195,809	\$1,467,941
2037	\$61,439,690	\$61,439,690		\$38,707	\$595,965	\$634,672	\$276,356	\$148,745	\$163,122	\$1,222,896
			<b>Total</b>	<b>\$1,396,475</b>	<b>\$7,106,726</b>	<b>\$8,503,201</b>	<b>\$1,946,070</b>	<b>\$1,047,451</b>	<b>\$1,148,692</b>	<b>\$12,645,413</b>
			<b>Diff</b>	<b>\$0</b>	<b>\$14,394,551</b>	<b>\$14,394,551</b>	<b>\$8,024,316</b>	<b>\$4,319,002</b>	<b>\$4,736,452</b>	<b>\$31,474,321</b>

Assumes School Value Limitation and Tax Abatements with the County.

Source: CPA, Canyon Wind Farm, 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 25<sup>th</sup> Anniversary of Limitation Start

This represents the Comptroller’s determination that Canyon Wind Farm, LLC (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)
<b>Limitation Pre-Years</b>	2020	\$0	\$0	\$0	\$0
	2021	\$0	\$0	\$0	\$0
	2022	\$22,701	\$22,701	\$0	\$0
<b>Limitation Period (10 Years)</b>	2023	\$291,000	\$313,701	\$1,976,845	\$1,976,845
	2024	\$291,000	\$604,701	\$1,857,425	\$3,834,270
	2025	\$291,000	\$895,701	\$1,738,005	\$5,572,275
	2026	\$291,000	\$1,186,701	\$1,618,585	\$7,190,860
	2027	\$291,000	\$1,477,701	\$1,499,165	\$8,690,026
	2028	\$291,000	\$1,768,701	\$1,379,745	\$10,069,771
	2029	\$291,000	\$2,059,701	\$1,260,325	\$11,330,096
	2030	\$291,000	\$2,350,701	\$1,140,905	\$12,471,001
	2031	\$291,000	\$2,641,701	\$1,021,485	\$13,492,486
	2032	\$291,000	\$2,932,701	\$902,065	\$14,394,551
<b>Maintain Viable Presence (5 Years)</b>	2033	\$1,073,645	\$4,006,346	\$0	\$14,394,551
	2034	\$954,225	\$4,960,571	\$0	\$14,394,551
	2035	\$834,805	\$5,795,376	\$0	\$14,394,551
	2036	\$715,385	\$6,510,761	\$0	\$14,394,551
	2037	\$595,965	\$7,106,726	\$0	\$14,394,551
<b>Additional Years as Required by 313.026(c)(1) (10 Years)</b>	2038	\$477,680	\$7,584,406	\$0	\$14,394,551
	2039	\$477,680	\$8,062,086	\$0	\$14,394,551
	2040	\$477,680	\$8,539,766	\$0	\$14,394,551
	2041	\$477,680	\$9,017,446	\$0	\$14,394,551
	2042	\$477,680	\$9,495,126	\$0	\$14,394,551
	2043	\$477,680	\$9,972,806	\$0	\$14,394,551
	2044	\$477,680	\$10,450,487	\$0	\$14,394,551
	2045	\$477,680	\$10,928,167	\$0	\$14,394,551
	2046	\$477,680	\$11,405,847	\$0	\$14,394,551
	2047	\$477,680	\$11,883,527	\$0	\$14,394,551

**\$11,883,527**

is less than

**\$14,394,551**

#### 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

NOTE: The analysis above only takes into account this project's estimated impact on the M&O portion of the school district property tax levy directly related to this project.

Source: CPA, Canyon Wind Farm, LLC

Year	Employment			Personal Income			Revenue & Expenditure		
	Direct	Indirect + Induced	Total	Direct	Indirect + Induced	Total	Revenue	Expenditure	Net Tax Effect
2021	129	117	246	\$6,446,750	\$10,553,250	\$17,000,000	850000	-470000	\$1,320,000
2022	129	1,070	1199	\$6,446,750	\$78,553,250	\$85,000,000	9140000	-2080000	\$11,220,000
2023	4	43	47	\$200,000	\$10,800,000	\$11,000,000	400000	980000	-\$580,000
2024	4	4	8	\$200,000	\$6,800,000	\$7,000,000	380000	990000	-\$610,000
2025	4	(14)	-10	\$200,000	\$2,800,000	\$3,000,000	230000	970000	-\$740,000
2026	4	(25)	-21	\$200,000	\$800,000	\$1,000,000	210000	910000	-\$700,000
2027	4	(29)	-25	\$200,000	-\$200,000	\$0	160000	820000	-\$660,000
2028	4	(29)	-25	\$200,000	-\$200,000	\$0	170000	760000	-\$590,000
2029	4	(25)	-21	\$200,000	-\$200,000	\$0	120000	680000	-\$560,000
2030	4	(22)	-18	\$200,000	-\$1,200,000	-\$1,000,000	130000	600000	-\$470,000
2031	4	(20)	-16	\$200,000	-\$1,200,000	-\$1,000,000	110000	520000	-\$410,000
2032	4	(8)	-4	\$200,000	-\$1,200,000	-\$1,000,000	140000	480000	-\$340,000
2033	4	(6)	-2	\$200,000	-\$200,000	\$0	110000	420000	-\$310,000
2034	4	(6)	-2	\$200,000	-\$200,000	\$0	90000	390000	-\$300,000
2035	4	(2)	2	\$200,000	-\$200,000	\$0	80000	360000	-\$280,000
2036	4	0	4	\$200,000	-\$200,000	\$0	70000	290000	-\$220,000
2037	4	2	6	\$200,000	-\$200,000	\$0	50000	260000	-\$210,000
2038	4	(4)	0	\$200,000	-\$200,000	\$0	20000	240000	-\$220,000
2039	4	2	6	\$200,000	-\$200,000	\$0	0	190000	-\$190,000
2040	4	(4)	0	\$200,000	-\$200,000	\$0	-80000	110000	-\$190,000
2041	4	(2)	2	\$200,000	-\$200,000	\$0	-110000	80000	-\$190,000
2042	4	(6)	-2	\$200,000	-\$1,200,000	-\$1,000,000	-120000	50000	-\$170,000
2043	4	(6)	-2	\$200,000	-\$200,000	\$0	-50000	50000	-\$100,000
2044	4	(6)	-2	\$200,000	\$800,000	\$1,000,000	-30000	60000	-\$90,000
2045	4	0	4	\$200,000	\$800,000	\$1,000,000	-30000	-20000	-\$10,000
2046	4	0	4	\$200,000	\$1,800,000	\$2,000,000	50000	20000	\$30,000
2047	4	6	10	\$200,000	\$1,800,000	\$2,000,000	80000	20000	\$60,000
2048	4	8	12	\$200,000	\$2,800,000	\$3,000,000	30000	20000	\$10,000
						<b>Total</b>	<b>\$12,200,000</b>	<b>\$7,700,000</b>	<b>\$4,500,000</b>
							<b>\$16,383,527</b>	is greater than	<b>\$14,394,551</b>

**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.