



GLENN HEGAR TEXAS COMPTROLLER OF PUBLIC ACCOUNTS

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

August 3, 2021

AMENDED CERTIFICATION

Andrew Seigrist
Superintendent
Tidehaven Independent School District
P. O. Box 129
El Maton, Texas 7744

Re: Amended Certificate for Limitation on Appraised Value of Property for School District Maintenance and Operations taxes by and between Tidehaven Independent School District and Danish Fields Solar, LLC, Application 1470

Dear Superintendent Seigrist:

This application (Application 1470) was originally submitted on March 2, 2020, to the Tidehaven Independent School District (school district) by Danish Fields Solar, LLC (applicant) for a limitation on appraised value under the provisions of Tax Code Chapter 313.¹ On May 14, 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 24, 2020. The applicant and school district executed an agreement for a limitation on appraised value (agreement) on November 9, 2020.

On June 21, 2021, the Comptroller received an amendment to the agreement to enlarge the project boundary and increase investments. 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.

¹ 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 within a year from the date of this letter.

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,

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 Danish Fields Solar, LLC (project) applying to Tidehaven 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 Danish Fields Solar, LLC.

	Original	Amendment No. 1
Applicant	Danish Fields Solar, LLC	Danish Fields Solar, LLC
Tax Code, 313.024 Eligibility Category	Electric Power Generation, Solar	Electric Power Generation, Solar
School District	Tidehaven ISD	Tidehaven ISD
2018-2019 Average Daily Attendance	915	915
County	Matagorda	Matagorda
Proposed Total Investment in District	\$315,000,000	\$344,850,000
Proposed Qualified Investment	\$315,000,000	\$304,279,412
Limitation Amount	\$30,000,000	\$30,000,000
Qualifying Time Period (Full Years)	2022-2023	2022-2023
Number of new qualifying jobs committed to by applicant	2*	2*
Number of new non-qualifying jobs estimated by applicant	0	0
Average weekly wage of qualifying jobs committed to by applicant	\$1,310	\$1,310
Minimum weekly wage required for each qualifying job by Tax Code, 313.021(5)(B)	\$1,310	\$1,310
Minimum annual wage committed to by applicant for qualified jobs	\$68,100	\$68,100
Minimum weekly wage required for non-qualifying jobs	\$1,087	\$1,087
Minimum annual wage required for non-qualifying jobs	\$56,524	\$56,524
Investment per Qualifying Job	\$157,500,000	\$172,425,000
Estimated M&O levy without any limit (15 years)	\$19,250,864	\$15,284,271
Estimated M&O levy with Limitation (15 years)	\$6,588,968	\$5,736,459
Estimated gross M&O tax benefit (15 years)	\$12,661,896	\$9,547,812

* 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 Danish Fields Solar, LLC (modeled).

Year	Employment			Personal Income		
	Direct	Indirect + Induced	Total	Direct	Indirect + Induced	Total
2021	50	76	126	\$0	\$10,670,000	\$10,670,000
2022	200	289	489.22	\$13,000,000	\$27,760,000	\$40,760,000
2023	2	44	46	\$136,200	\$6,713,800	\$6,850,000
2024	2	26	28	\$136,200	\$4,623,800	\$4,760,000
2025	2	8	10	\$136,200	\$2,713,800	\$2,850,000
2026	2	(2)	0	\$136,200	\$1,503,800	\$1,640,000
2027	2	(5)	-3	\$136,200	\$813,800	\$950,000
2028	2	(6)	-4	\$136,200	\$493,800	\$630,000
2029	2	(4)	-2	\$136,200	\$413,800	\$550,000
2030	2	(3)	-1	\$136,200	\$443,800	\$580,000
2031	2	(0)	2	\$136,200	\$563,800	\$700,000
2032	2	2	4	\$136,200	\$753,800	\$890,000
2033	2	3	5	\$136,200	\$913,800	\$1,050,000
2034	2	5	7	\$136,200	\$1,083,800	\$1,220,000
2035	2	6	8	\$136,200	\$1,223,800	\$1,360,000
2036	2	6	8	\$136,200	\$1,323,800	\$1,460,000

Source: CPA REMI, Danish Fields Solar, 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	Tidehaven ISD I&S Tax Levy	Tidehaven ISD M&O Tax Levy	M&O and I&S Tax Levies	Matagorda County Tax Levy	Matagorda County Hospital District Tax Levy	Matagorda Drainage District #2 Tax Levy	Port of Bay City Tax Levy	Costal Plains GCD Tax Levy	Conservation & Reclamation Tax Levy	Estimated Total Property Taxes	
			0.2476	0.9700			0.4334	0.3216	0.0461	0.0548	0.0047	0.0078		
2023	\$222,248,900	\$222,248,900		\$550,288	\$2,155,814	\$2,706,103	\$645,392	\$478,869	\$33,781	\$81,556	\$6,999	\$11,555	\$3,964,255	
2024	\$202,953,110	\$202,953,110		\$502,512	\$1,968,645	\$2,471,157	\$589,358	\$437,294	\$30,848	\$74,475	\$6,391	\$10,552	\$3,620,076	
2025	\$183,657,630	\$183,657,630		\$454,736	\$1,781,479	\$2,236,215	\$533,326	\$395,718	\$27,916	\$67,395	\$5,783	\$9,549	\$3,275,902	
2026	\$161,951,990	\$161,951,990		\$400,993	\$1,570,934	\$1,971,927	\$470,295	\$348,950	\$24,616	\$59,430	\$5,100	\$8,420	\$2,888,739	
2027	\$140,246,640	\$140,246,640		\$347,251	\$1,360,392	\$1,707,643	\$407,264	\$302,183	\$21,317	\$51,465	\$4,416	\$7,292	\$2,501,580	
2028	\$118,541,580	\$118,541,580		\$293,509	\$1,149,853	\$1,443,362	\$344,235	\$255,416	\$18,018	\$43,500	\$3,733	\$6,163	\$2,114,427	
2029	\$94,426,340	\$94,426,340		\$233,800	\$915,935	\$1,149,735	\$274,206	\$203,456	\$14,353	\$34,651	\$2,973	\$4,909	\$1,684,283	
2030	\$63,080,020	\$63,080,020		\$156,186	\$611,876	\$768,062	\$183,179	\$135,916	\$9,588	\$23,148	\$1,986	\$3,280	\$1,125,159	
2031	\$48,607,110	\$48,607,110		\$120,351	\$471,489	\$591,840	\$141,151	\$104,731	\$7,388	\$17,837	\$1,531	\$2,527	\$867,005	
2032	\$48,597,160	\$48,597,160		\$120,327	\$471,392	\$591,719	\$141,122	\$104,710	\$7,387	\$17,833	\$1,530	\$2,527	\$866,828	
2033	\$48,587,460	\$48,587,460		\$120,303	\$471,298	\$591,601	\$141,094	\$104,689	\$7,385	\$17,830	\$1,530	\$2,526	\$866,655	
2034	\$48,578,000	\$48,578,000		\$120,279	\$471,207	\$591,486	\$141,066	\$104,669	\$7,384	\$17,826	\$1,530	\$2,526	\$866,486	
2035	\$48,568,780	\$48,568,780		\$120,256	\$471,117	\$591,373	\$141,040	\$104,649	\$7,382	\$17,823	\$1,529	\$2,525	\$866,322	
2036	\$48,559,790	\$48,559,790		\$120,234	\$471,030	\$591,264	\$141,013	\$104,629	\$7,381	\$17,819	\$1,529	\$2,525	\$866,161	
2037	\$48,551,020	\$48,551,020		\$120,212	\$470,945	\$591,157	\$140,988	\$104,611	\$7,380	\$17,816	\$1,529	\$2,524	\$866,005	
2038	\$48,542,470	\$48,542,470		\$120,191	\$470,862	\$591,053	\$140,963	\$104,592	\$7,378	\$17,813	\$1,529	\$2,524	\$865,852	
				Total	\$3,901,428	\$15,284,271	\$19,185,699	\$4,575,691	\$3,395,082	\$239,503	\$578,217	\$49,619	\$81,924	\$28,105,735

Source: CPA, Danish Fields Solar, LLC

*Tax Rate per \$100 Valuation

Table 4 examines the estimated direct impact on ad valorem taxes to the school district and Matagorda 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	Tax Rate	Tidehaven ISD I&S Tax Levy	Tidehaven ISD M&O Tax Levy	M&O and I&S Tax Levies	Matagorda County Tax Levy	Matagorda County Hospital District Tax Levy	Matagorda Drainage District #2 Tax Levy	Port of Bay City Tax Levy	Costal Plains GCD Tax Levy	Conservation & Reclamation Tax Levy	Estimated Total Property Taxes	
				0.2476	0.9700		0.4334	0.3216	0.0461	0.0548	0.0047	0.0078		
2023	\$222,248,900	\$30,000,000		\$550,288	\$291,000	\$841,288	\$645,392	\$478,869	\$33,781	\$81,556	\$6,999	\$11,555	\$2,099,441	
2024	\$202,953,110	\$30,000,000		\$502,512	\$291,000	\$793,512	\$589,358	\$437,294	\$30,848	\$74,475	\$6,391	\$10,552	\$1,942,431	
2025	\$183,657,630	\$30,000,000		\$454,736	\$291,000	\$745,736	\$533,326	\$395,718	\$27,916	\$67,395	\$5,783	\$9,549	\$1,785,423	
2026	\$161,951,990	\$30,000,000		\$400,993	\$291,000	\$691,993	\$470,295	\$348,950	\$24,616	\$59,430	\$5,100	\$8,420	\$1,608,804	
2027	\$140,246,640	\$30,000,000		\$347,251	\$291,000	\$638,251	\$407,264	\$302,183	\$21,317	\$51,465	\$4,416	\$7,292	\$1,432,188	
2028	\$118,541,580	\$30,000,000		\$293,509	\$291,000	\$584,509	\$344,235	\$255,416	\$18,018	\$43,500	\$3,733	\$6,163	\$1,255,574	
2029	\$94,426,340	\$30,000,000		\$233,800	\$291,000	\$524,800	\$274,206	\$203,456	\$14,353	\$34,651	\$2,973	\$4,909	\$1,059,348	
2030	\$63,080,020	\$30,000,000		\$156,186	\$291,000	\$447,186	\$183,179	\$135,916	\$9,588	\$23,148	\$1,986	\$3,280	\$804,283	
2031	\$48,607,110	\$30,000,000		\$120,351	\$291,000	\$411,351	\$141,151	\$104,731	\$7,388	\$17,837	\$1,531	\$2,527	\$686,516	
2032	\$48,597,160	\$30,000,000		\$120,327	\$291,000	\$411,327	\$141,122	\$104,710	\$7,387	\$17,833	\$1,530	\$2,527	\$686,435	
2033	\$48,587,460	\$48,587,460		\$120,303	\$471,298	\$591,601	\$141,094	\$104,689	\$7,385	\$17,830	\$1,530	\$2,526	\$866,655	
2034	\$48,578,000	\$48,578,000		\$120,279	\$471,207	\$591,486	\$141,066	\$104,669	\$7,384	\$17,826	\$1,530	\$2,526	\$866,486	
2035	\$48,568,780	\$48,568,780		\$120,256	\$471,117	\$591,373	\$141,040	\$104,649	\$7,382	\$17,823	\$1,529	\$2,525	\$866,322	
2036	\$48,559,790	\$48,559,790		\$120,234	\$471,030	\$591,264	\$141,013	\$104,629	\$7,381	\$17,819	\$1,529	\$2,525	\$866,161	
2037	\$48,551,020	\$48,551,020		\$120,212	\$470,945	\$591,157	\$140,988	\$104,611	\$7,380	\$17,816	\$1,529	\$2,524	\$866,005	
2038	\$48,542,470	\$48,542,470		\$120,191	\$470,862	\$591,053	\$140,963	\$104,592	\$7,378	\$17,813	\$1,529	\$2,524	\$865,852	
				Total	\$3,901,428	\$5,736,459	\$9,637,887	\$4,575,691	\$3,395,082	\$239,503	\$578,217	\$49,619	\$81,924	\$18,557,923
				Diff	\$0	\$9,547,812	\$9,547,812	\$0	\$0	\$0	\$0	\$0	\$0	\$9,547,812

Assumes School Value Limitation and Tax Abatements with the County.

Source: CPA, Danish Fields Solar, 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 Danish Fields Solar, 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 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	2020	\$0	\$0	\$0	\$0
	2021	\$0	\$0	\$0	\$0
	2022	\$118,060	\$118,060	\$0	\$0
Limitation Period (10 Years)	2023	\$291,000	\$409,060	\$1,864,814	\$1,864,814
	2024	\$291,000	\$700,060	\$1,677,645	\$3,542,459
	2025	\$291,000	\$991,060	\$1,490,479	\$5,032,939
	2026	\$291,000	\$1,282,060	\$1,279,934	\$6,312,873
	2027	\$291,000	\$1,573,060	\$1,069,392	\$7,382,265
	2028	\$291,000	\$1,864,060	\$858,853	\$8,241,119
	2029	\$291,000	\$2,155,060	\$624,935	\$8,866,054
	2030	\$291,000	\$2,446,060	\$320,876	\$9,186,930
	2031	\$291,000	\$2,737,060	\$180,489	\$9,367,419
	2032	\$291,000	\$3,028,060	\$180,392	\$9,547,812
	Maintain Viable Presence (5 Years)	2033	\$471,298	\$3,499,359	\$0
2034		\$471,207	\$3,970,565	\$0	\$9,547,812
2035		\$471,117	\$4,441,683	\$0	\$9,547,812
2036		\$471,030	\$4,912,713	\$0	\$9,547,812
2037		\$470,945	\$5,383,657	\$0	\$9,547,812
Additional Years as Required by 313.026(c)(1) (10 Years)	2038	\$470,862	\$5,854,519	\$0	\$9,547,812
	2039	\$470,781	\$6,325,300	\$0	\$9,547,812
	2040	\$470,702	\$6,796,003	\$0	\$9,547,812
	2041	\$470,625	\$7,266,628	\$0	\$9,547,812
	2042	\$470,550	\$7,737,178	\$0	\$9,547,812
	2043	\$470,477	\$8,207,656	\$0	\$9,547,812
	2044	\$470,406	\$8,678,062	\$0	\$9,547,812
	2045	\$470,337	\$9,148,398	\$0	\$9,547,812
	2046	\$470,269	\$9,618,667	\$0	\$9,547,812
	2047	\$470,203	\$10,088,870	\$0	\$9,547,812
		\$10,088,870	is greater than	\$9,547,812	
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

Source: CPA, Danish Fields Solar, LLC

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.