



CUMMINGS WESTLAKE
PROPERTY TAX ADVISORS

September 17, 2020

Sara Leon
Sara Leon and Associates, LLC
2901 Via Fortuna, Bldg. 6, Suite 475
Austin, Texas 78746

Sara;

Attached please find the hard copies of the Amended Application pages for the Bluebonnet Wind Power, LLC project (Application # 1511 in Goldthwaite ISD).

The changes to the original Application are as follows in response to the attached August 25, 2020 e-mail from Comptroller staff :

- Section 14 – Please note that TWC has released 1st quarter wages for 2020 in QCEW. As such, Wages for Section 14, questions 6 and 7 and Tab 13 must be updated to reflect the 4 most recent quarters.
Section 14, questions 4, 6 and 7 of form 50-296-A have been updated and correspond to the Amended Wage Date in Tab 13.
- Tab 13 and 14 – Please provide the most recent wage data for Scurry County and West Central Texas Council of Governments the 2020 Manufacturing Average Wages by Council of Government Region Wages for All Occupations have been released by TWC, therefore; you will need to updated on Section 14 and in Tab 13 Schedule C, if needed.
Tab 13 Wage Data has been amended to include the most recent quarterly wage data as well as the most recent Council of Government Region Wage Data for Mills County where the project is proposed for construction. Schedule C has been updated as well.
- Map Revisions – Please provide a map showing only the project area, ISD boundary, county boundary and proposed location of turbines related to Goldthwaite ISD with landmarks, roads or highways.

Because of the size restrictions in capturing one map with all boundaries, an additional map has been supplied which shows the project boundary with proposed turbine locations and roads and highways identified. Maps already included in the Application show the Project Area, ISD boundary and County boundary with sufficient detail to verify that the project is located solely in Goldthwaite ISD and Mills County.

Please submit above questions as Amendment 1 and include the submission date and number on each corrected page (Example: Amendment 1- 1511- Goldthwaite ISD– Bluebonnet Wind Power, LLC-Date). A new signature page will be required for Amendment 1.

New signature page executed and notarized by the company is attached

The below questions (1) may be answered via email and do not require a new signature page:

1. Please provide the website for tax rate of the following: Mills County (0.539882);

Section 10, Question 4 has been amended to include the County tax Rate found on the Comptroller's Tax Rate website.

Please let me know if you have questions or need additional information.

Sincerely,



Sam A. Gregson
Senior Consultant

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.

SECTION 9: Projected Timeline

NOTE: Only construction beginning after the application review start date (the date the Texas Comptroller of Public Accounts deems the application complete) can be considered qualified property and/or qualified investment.

1. Estimated school board ratification of final agreement December 2020
 2. Estimated commencement of construction Q4 - 2020
 3. Beginning of qualifying time period (MM/DD/YYYY) 01/01/2021
 4. First year of limitation (MM/DD/YYYY) 01/01/2022
- 4a. For the beginning of the limitation period, notate which **one of the following** will apply according to provision of 313.027(a-1)(2):
- A. January 1 following the application date B. January 1 following the end of QTP
- C. January 1 following the commencement of commercial operations
5. Commencement of commercial operations December 2021

SECTION 10: The Property

1. Identify county or counties in which the proposed project will be located Mills County
2. Identify Central Appraisal District (CAD) that will be responsible for appraising the property Mills 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:

M&O (ISD): <u>Goldthwaite ISD; \$0.97, 100%</u> (Name, tax rate and percent of project)	I&S (ISD): <u>Goldthwaite ISD; \$0.32187 100%</u> (Name, tax rate and percent of project)
County: <u>Mills County, \$0.7039, 100%</u> (Name, tax rate and percent of project)	City: <u>N/A</u> (Name, tax rate and percent of project)
Hospital District: <u>N/A</u> (Name, tax rate and percent of project)	Water District: <u>N/A</u> (Name, tax rate and percent of project)
Other (describe): _____ (Name, tax rate and percent of project)	Other (describe): _____ (Name, tax rate and percent of project)

SECTION 14: Wage and Employment Information

1. What is the number of new qualifying jobs you are committing to create? 2
2. What is the number of new non-qualifying jobs you are estimating you will create? (See TAC 9.1051(14)) 0
3. 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) and TAC 9.1051(b)(1)? Yes No
 - 3a. If yes, attach evidence of industry standard 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.
4. 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). **Note:** If a more recent quarter of information becomes available before the application is deemed complete, updated wage information will be required.
 - a. Non-qualified job wages
- average weekly wage for all jobs (all industries) in the county is 679.50
 - b. Qualifying job wage minimum option §313.021(5)(A)
- 110% of the average weekly wage for manufacturing jobs in the county is 659.73
 - c. Qualifying job wage minimum option §313.021(5)(B)
- 110% of the average weekly wage for manufacturing jobs in the region is 926.98
5. 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)
6. What is the minimum required annual wage for each qualifying job based on the qualified property? 34,305.70
7. What is the annual wage you are committing to pay for each of the new qualifying jobs you create on the qualified property? 34,400.00
8. Will the qualifying jobs meet all minimum requirements set out in Tax Code §313.021(3)? Yes No
9. 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
 - 9a. If yes, attach in **Tab 12** supporting documentation from the TWC, pursuant to §313.021(3)(F).
10. 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
 - 10a. 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, and C 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**.

**BLUEBONNET WIND POWER, LLC
TAB 13 TO CHAPTER 313 APPLICATION**

**MILLS COUNTY
CHAPTER 313 WAGE CALCULATION - ALL JOBS - ALL INDUSTRIES**

QUARTER	YEAR	AVG WEEKLY WAGES*	ANNUALIZED
FIRST	2020	\$ 681	\$ 35,412
SECOND	2019	\$ 668	\$ 34,736
THIRD	2019	\$ 676	\$ 35,152
FOURTH	2019	\$ 693	\$ 36,036
AVERAGE		\$ 679.50	\$ 35,334.00

**MILLS COUNTY
CHAPTER 313 WAGE CALCULATION - MANUFACTURING JOBS**

QUARTER	YEAR	AVG WEEKLY WAGES*	ANNUALIZED
FIRST	2020	\$ 562	\$ 29,224
SECOND	2019	\$ 595	\$ 30,940
THIRD	2019	\$ 643	\$ 33,436
FOURTH	2019	\$ 599	\$ 31,148
AVERAGE		\$ 599.75	\$ 31,187
		X 110%	110%
		\$ 659.73	\$ 34,305.70

CHAPTER 313 WAGE CALCULATION - REGIONAL WAGE RATE

YEAR	AVG WEEKLY WAGES*	ANNUALIZED
2019	\$ 843	\$ 43,821
	X 110%	110%
	\$ 926.98	\$ 48,203.10

* SEE ATTACHED TWC DOCUMENTATION

1511 - Goldthwaite ISD - Bluebonnet Wind Power, LLC - Amendment 1
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Year	Period	Area	Ownership	Industry Code	Industry	Level	Average Weekly Wage
2019	02	Mills	Total All	10	Total, All Industries	0	668
2019	03	Mills	Total All	10	Total, All Industries	0	676
2019	04	Mills	Total All	10	Total, All Industries	0	693
2020	01	Mills	Total All	10	Total, All Industries	0	681

1511 - Goldthwaite ISD - Bluebonnet Wind Power, LLC - Amendment 1
September 17, 2020

Year	Period	Area	Ownership	Industry Code	Industry	Level	Average Weekly Wage
2019	02	Mills	Private	31-33	Manufacturing	2	595
2019	03	Mills	Private	31-33	Manufacturing	2	643
2019	04	Mills	Private	31-33	Manufacturing	2	599
2020	01	Mills	Private	31-33	Manufacturing	2	562

2019 Manufacturing Average Wages by Council of Government Region
Wages for All Occupations

COG	COG Number	Wages	
		Hourly	Annual
Panhandle Regional Planning Commission	1	\$22.31	\$46,399
South Plains Association of Governments	2	\$18.97	\$39,448
NORTEX Regional Planning Commission	3	\$20.38	\$42,395
North Central Texas Council of Governments	4	\$32.92	\$68,476
Ark-Tex Council of Governments	5	\$20.09	\$41,780
East Texas Council of Governments	6	\$28.95	\$60,211
West Central Texas Council of Governments	7	\$21.83	\$45,406
Rio Grande Council of Governments	8	\$18.15	\$37,749
Permian Basin Regional Planning Commission	9	\$21.87	\$45,499
Concho Valley Council of Governments	10	\$26.74	\$55,625
Heart of Texas Council of Governments	11	\$22.41	\$46,614
Capital Area Council of Governments	12	\$29.37	\$61,091
Brazos Valley Council of Governments	13	\$17.60	\$36,613
Deep East Texas Council of Governments	14	\$21.06	\$43,796
South East Texas Regional Planning Commission	15	\$25.52	\$53,079
Houston-Galveston Area Council	16	\$28.85	\$60,015
Golden Crescent Regional Planning Commission	17	\$21.43	\$44,565
Alamo Area Council of Governments	18	\$26.64	\$55,401
South Texas Development Council	19	\$18.70	\$38,889
Coastal Bend Council of Governments	20	\$34.94	\$72,668
Lower Rio Grande Valley Development Council	21	\$20.05	\$41,698
Texoma Council of Governments	22	\$18.40	\$38,280
Central Texas Council of Governments	23	\$21.07	\$43,821
Middle Rio Grande Development Council	24	\$22.74	\$47,296
Texas		\$27.25	\$56,673

Calculated by the Texas Workforce Commission Labor Market and Career Information Department.
Data published: August 2020.
Data published annually, next update will likely be July 31, 2021
Annual Wage Figure assumes a 40-hour work week.

110% X \$43,821 = \$48,203.10

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 implementing Chapter 313, Texas Tax Code.

Schedule C: Employment Information

Date 6/10/2020
Applicant Name BLUEBONNET WIND PROJECT, LLC
ISD Name GOLDTHWAITE ISD

Form 50-296A

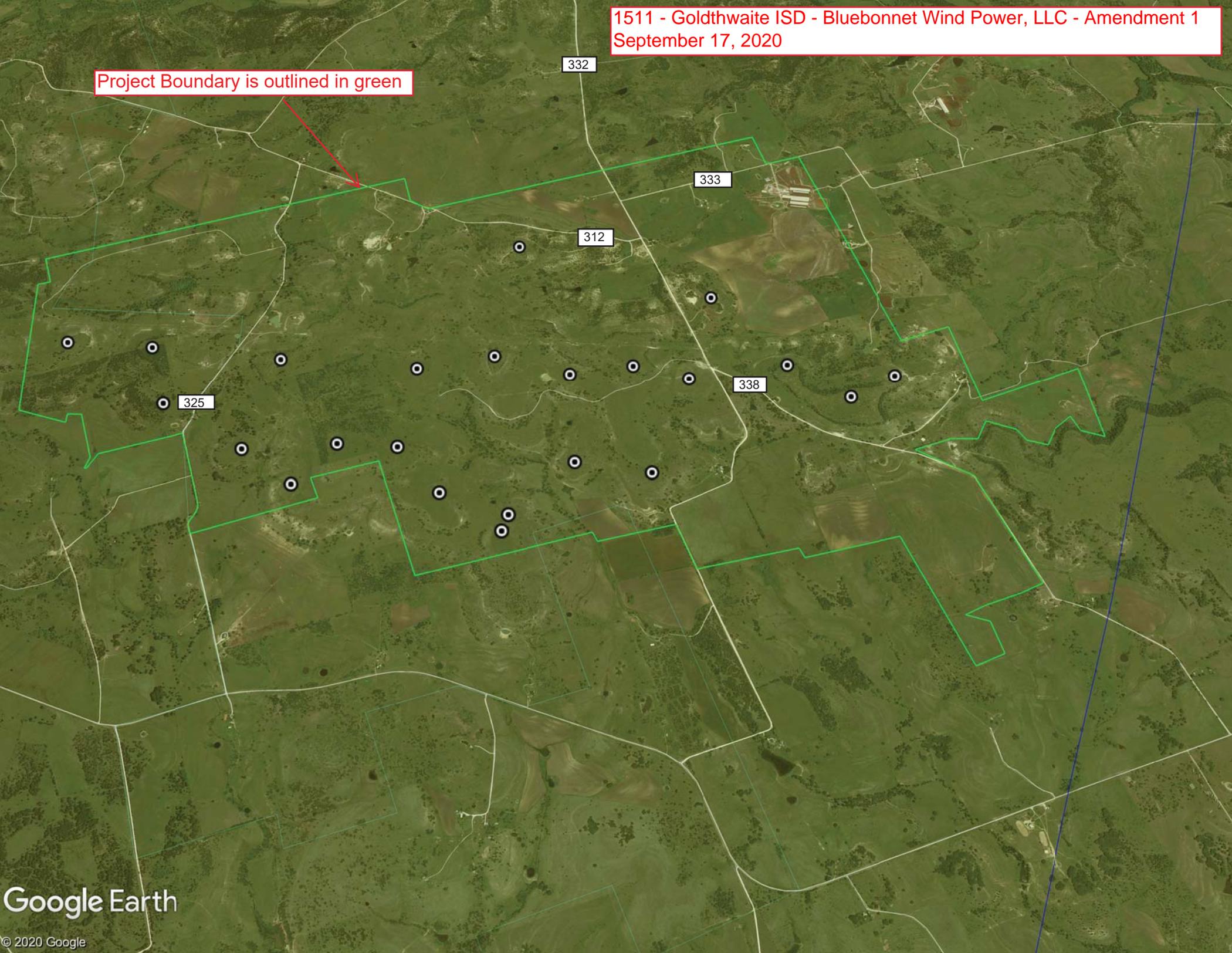
Revised May 2014

	Year	School Year (YYYY-YYYY)	Tax Year (Actual tax year) YYYY	Construction		Non-Qualifying Jobs	Qualifying Jobs	
				Column A Number of Construction FTE's or man-hours (specify)	Column B Average annual wage rates for construction workers	Column C Number of non-qualifying jobs applicant estimates it will create (cumulative)	Column D Number of new qualifying jobs applicant commits to create meeting all criteria of Sec. 313.021(3) (cumulative)	Column E Average annual wage of new qualifying jobs
Each year prior to start of Value Limitation Period <i>Insert as many rows as necessary</i>	0	2020-2021	2020	200 FTE	43,000	0	0	0
	0	2021-20022	2021	200 FTE	43,000	0	0	0
Value Limitation Period <i>The qualifying time period could overlap the value limitation period.</i>	1	2022-2023	2022	N/A	N/A	0	2	34,400
	2	2023-2024	2023	N/A	N/A	0	2	34,400
	3	2024-2025	2024	N/A	N/A	0	2	34,400
	4	2025-2026	2025	N/A	N/A	0	2	34,400
	5	2026-2027	2026	N/A	N/A	0	2	34,400
	6	2027-2028	2027	N/A	N/A	0	2	34,400
	7	2028-2029	2028	N/A	N/A	0	2	34,400
	8	2029-2030	2029	N/A	N/A	0	2	34,400
	9	2030-2031	2030	N/A	N/A	0	2	34,400
10	2031-2032	2031	N/A	N/A	0	2	34,400	
Years Following Value Limitation Period	11 through 25	2034-2046	2034-2046	N/A	N/A	0	2	34,400

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 Yes No
qualifying jobs in Subchapter B districts, 10 qualifying jobs in Subchapter C districts)
If yes, answer the following two questions:
- C1a. Will the applicant request a job waiver, as provided under 313.025(f-1)? Yes No
- C1b. Will the applicant avail itself of the provision in 313.021(3)(F)? Yes No

Project Boundary is outlined in green



Texas Comptroller of Public Accounts

Data Analysis and
Transparency
Form 50-296-A

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

Ronnie Wright

Print Name (Authorized School District Representative)

Superintendent

Title

sign here

Ronnie Wright

Signature (Authorized School District Representative)

9/21/2020

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

William Kelsey

Print Name (Authorized Company Representative (Applicant))

Partner

Title

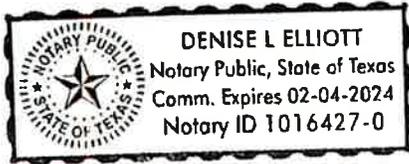
sign here

William Kelsey

Signature (Authorized Company Representative (Applicant))

9/16/20

Date



(Notary Seal)

GIVEN under my hand and seal of office this, the

16th day of Sept. 2020
Denise Elliott

Notary Public in and for the State of Texas

My Commission expires. 02-04-24

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.