SARA LEON
& ASSOCIATES, LLC

September 29, 2020

Via Electronic Mail
Local Government Assistance & Economic Analysis
Texas Comptroller of Public Accounts
111 E. 17th Street
Austin, Texas 78774

Re: Application for a Chapter 313 Value Limitation Agreement between the Snyder Independent School District and IP Lumina, LLC

First Year of Qualifying Time Period – 2023
First Year of Limitation – 2024

Dear Local Government Assistance and Economic Analysis Division:

The Snyder Independent School District Board of Trustees approved the enclosed Application for Appraised Value Limitation on Qualified Property at a duly called meeting held on September 10, 2020. The Application was determined to be complete on September 29, 2020. The Applicant plans to construct an estimated 360 MW wind farm in Scurry County, One Hundred percent of which will be qualified investment located in Snyder ISD.

A copy is being provided to the Scurry County Appraisal District by copy of this correspondence. The Board of Trustees believes this project will be beneficial to the District and looks forward to your review and certification of this Application.

Thanks so much for your kind attention to this matter.

Respectfully submitted,

Sara Hardner Leon

SHL:vr
Enclosures

512.637.4244 | saraleonlaw.com
Austin | Houston | Corpus Christi

S|L

2901 Via Fortuna, Building 6, Suite 475
Austin, Texas 78746

cc: *Via Electronic Mail: jmartin@scurrytex.com*
Ms. Jackie Martin, RPA, RTA, CTA
Chief Appraiser
Scurry County Appraisal District
2612 College Avenue
Snyder, Texas 79549-3334

Via Electronic Mail: ebland@snyderisd.net
Dr. J. Eddie Bland, Superintendent of Schools, Snyder Independent School District

Via Electronic Mail: luke@intersectpower.com
Mr. Lucas Dunnington, Vice President of IP Renewable Energy Holdings, LLC, sole member of IP Portfolio I, LLC, sole member of IP Pipeline Portfolio Holdco, LLC sole member of IP Lumina, LLC

Via Electronic Mail: christian@intersectpower.com
Mr. Christian Feine, IP Lumina, LLC

Via Electronic Mail: bwestlake@cwlp.net
Mr. Brandon Westlake, Senior Tax Consultant, Cummings Westlake, LLC

Via Electronic Mail: saraleongroup@saraleonlaw.com

TAB 1

Pages 1 through 9 of application

Application for Appraised Value Limitation on Qualified Property

(Tax Code, Chapter 313, Subchapter B or C)

INSTRUCTIONS: This application must be completed and filed with the school district. In order for an application to be processed, the governing body (school board) must elect to consider an application, but — by Comptroller rule — the school board may elect to consider the application only after the school district has received a completed application. Texas Tax Code, Section 313.025 requires that any completed application and any supplemental materials received by the school district must be forwarded within seven days to the Comptroller of Public Accounts.

If the school board elects to consider the application, the school district must:

- notify the Comptroller that the school board has elected to consider the application. This notice must include:
  - the date on which the school district received the application;
  - the date the school district determined that the application was complete;
  - the date the school board decided to consider the application; and
  - a request that the Comptroller prepare an economic impact analysis of the application;
- provide a copy of the notice to the appraisal district;
- must complete the sections of the application reserved for the school district and provide information required in the Comptroller rules located at 34 Texas Administrative Code (TAC) Section 9.1054; and
- forward the original hard copy of the completed application to the Comptroller, as indicated on page 9 of this application, separating each section of the documents in addition to an electronic copy. See 34 TAC Chapter 9, Subchapter F.

The governing body may, at its discretion, allow the applicant to supplement or amend the application after the filing date, subject to the restrictions in 34 TAC Chapter 9, Subchapter F.

When the Comptroller receives the notice and required information from the school district, and has determined that all assertions of confidentiality are appropriate, the Comptroller will publish all submitted non-confidential application materials on its website. The Comptroller is authorized to treat some application information as confidential and withhold it from publication on the Internet. To do so, however, the information must be segregated and comply with the other requirements set out in the Comptroller rules. For more information, see guidelines on Comptroller's website.

The Comptroller will independently determine whether the application has been completed according to the Comptroller's rules (34 TAC Chapter 9, Subchapter F). If the Comptroller finds the application is not complete, the Comptroller will request additional materials from the school district. Pursuant to 9.1053(a)(1)(C), requested information shall be provided within 20 days of the date of the request. When the Comptroller determines that the application is complete, it will send the school district a notice indicating so. The Comptroller will determine the eligibility of the project, issue a certificate for a limitation on appraised value to the school board regarding the application and prepare an economic impact evaluation by the 90th day after the Comptroller receives a complete application—as determined by the Comptroller.

The school board must approve or disapprove the application not later than the 150th day after the application review start date (the date the application is finally determined to be complete), unless an extension is granted. The Comptroller and school district are authorized to request additional information from the applicant that is reasonably necessary to issue a certificate, complete the economic impact evaluation or consider the application at any time during the application review period.

Please visit the Comptroller's website to find out more about the program at comptroller.texas.gov/economy/local/ch313/. There are links to the Chapter 313 statute, rules, guidelines and forms. Information about minimum limitation values for particular districts and wage standards may also be found at that site.

SECTION 1: School District Information

1. Authorized School District Representative

September 10, 2020
Date Application Received by District

Eddie
First Name

Bland
Last Name

Superintendent
Title

Snyder Independent School District
School District Name

2910 37th Street
Street Address

2910 37th Street
Mailing Address

Snyder
City

TX
State

79549
ZIP

325-574-8900
Phone Number

Fax Number

Mobile Number (optional)

ebland@snyderisd.net
Email Address

2. Does the district authorize the consultant to provide and obtain information related to this application? ..... ☑ Yes ☐ No

SECTION 1: School District Information *(continued)*

3. Authorized School District Consultant *(If Applicable)*

First Name: Sara
Last Name: Leon
Title: Attorney
Firm Name: Sara Leon & Associates, LLC
Phone Number: 512-637-4244
Fax Number: 512-637-4245
Mobile Number (optional):
Email Address: saraleongroup@saraleonlaw.com

4. On what date did the district determine this application complete? September 29, 2020

5. Has the district determined that the electronic copy and hard copy are identical? ☑ Yes ☐ No

SECTION 2: Applicant Information

1. Authorized Company Representative *(Applicant)*

First Name: Lucas
Last Name: Dunnington
Title: Vice President of IP Renewable Energy Holdings LLC, sole member of IP Portfolio I, LLC, sole member of IP Pipeline Portfolio Holdco, LLC sole member of IP Lumina, LLC
Organization: IP Lumina, LLC
Street Address: c/o Intersect Power, LLC
Mailing Address: 9450 SW Gemini Drive PMB #68743
City: Beaverton
State: OR
ZIP: 97008-7105
Phone Number: 317-345-0632
Fax Number:
Mobile Number (optional):
Business Email Address: luke@intersectpower.com

2. Will a company official other than the authorized company representative be responsible for responding to future information requests? ☑ Yes ☐ No

2a. If yes, please fill out contact information for that person.

First Name: Christian
Last Name: Fiene
Title: Principal
Organization: IP Lumina, LLC
Street Address: c/o Intersect Power, LLC
Mailing Address: 9450 SW Gemini Drive PMB #68743
City: Beaverton
State: OR
ZIP: 97008
Phone Number: 317-345-0632
Fax Number:
Mobile Number (optional):
Business Email Address: christian@intersectpower.com

3. Does the applicant authorize the consultant to provide and obtain information related to this application? ☑ Yes ☐ No

SECTION 2: Applicant Information *(continued)*

4. Authorized Company Consultant *(If Applicable)*

First Name: Brandon
Last Name: Westlake
Title: Senior Tax Consultant
Firm Name: Cummings Westlake LLC
Phone Number: 713-266-4456
Fax Number: 713-266-2333
Business Email Address: bwestlake@cwlp.net

SECTION 3: Fees and Payments

1. Has an application fee been paid to the school district? ☑ Yes ☐ No

The total fee shall be paid at time of the application is submitted to the school district. Any fees not accompanying the original application shall be considered supplemental payments.

1a. If yes, include all transaction information below. Include proof of application fee paid to the school district in **Tab 2**. Any confidential banking information provided will not be publicly posted.

Payment Amount: $75,000
Transaction Type: Check
Payor: IP Lumina, LLC
Payee: Snyder ISD
Date transaction was processed: September 10, 2020

For the purpose of questions 2 and 3, "payments to the school district" include any and all payments or transfers of things of value made to the school district or to any person or persons in any form if such payment or transfer of thing of value being provided is in recognition of, anticipation of, or consideration for the agreement for limitation on appraised value.

2. Will any "payments to the school district" that you may make in order to receive a property tax value limitation agreement result in payments that are not in compliance with Tax Code §313.027(i)? ☐ Yes ☑ No ☐ N/A

3. If "payments to the school district" will only be determined by a formula or methodology without a specific amount being specified, could such method result in "payments to the school district" that are not in compliance with Tax Code §313.027(i)? ☐ Yes ☑ No ☐ N/A

SECTION 4: Business Applicant Information

1. What is the legal name of the applicant under which this application is made? IP Lumina, LLC
2. List the Texas Taxpayer I.D. number of entity subject to Tax Code, Chapter 171 (11 digits) 32068514515
3. Parent Company Name IP Renewable Energy Holdings, LLC
4. Parent Company Tax ID 82-2081095
5. List the NAICS code 221114
6. Is the applicant a party to any other pending or active Chapter 313 agreements? ☐ Yes ☑ No

6a. If yes, please list application number, name of school district and year of agreement

SECTION 5: Applicant Business Structure

1. Identify Business Organization of Applicant (corporation, limited liability corporation, etc) Limited Liability Company
2. Is applicant a combined group, or comprised of members of a combined group, as defined by Tax Code §171.0001(7)? ☑ Yes ☐ No

2a. If yes, attach in **Tab 3** a copy of Texas Comptroller Franchise Tax Form No. 05-165, No. 05-166, or any other documentation from the Franchise Tax Division to demonstrate the applicant's combined group membership and contact information.

SECTION 5: Applicant Business Structure *(continued)*

2b. List the Texas Franchise Tax Reporting Entity Taxpayer Name

IP Renewable Energy Holdings, LLC

2c. List the Reporting Entity Taxpayer Number

32071139383

3. Is the applicant current on all tax payments due to the State of Texas? ☑ Yes ☐ No
4. Are all applicant members of the combined group current on all tax payments due to the State of Texas? ☑ Yes ☐ No ☐ N/A

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

*__Note__: Applicants requesting eligibility under this category should note that there are additional application and reporting data submission requirements.

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. If the project is an amendment or a reapplication please specify and provide details regarding the original project.
2. Check the project characteristics that apply to the proposed project:
   - ☑ Land has no existing improvements
   - ☐ Land has existing improvements (complete Section 13)
   - ☐ Expansion of existing operation on the land (complete Section 13)
   - ☐ 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.

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: March 2021
2. Estimated commencement of construction: Q4 - 2022
3. Beginning of qualifying time period (MM/DD/YYYY): 01/01/2023
4. First year of limitation (MM/DD/YYYY): 01/01/2024

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 2023

SECTION 10: The Property

1. Identify county or counties in which the proposed project will be located: Scurry County
2. Identify Central Appraisal District (CAD) that will be responsible for appraising the property: Scurry 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): Snyder ISD; 100%; $0.97 (Name, tax rate and percent of project)

I&S (ISD): Snyder ISD; 100%; $0.063 (Name, tax rate and percent of project)

County: Scurry County; 100%; $0.4498 (Name, tax rate and percent of project)

City: N/A (Name, tax rate and percent of project)

Hospital District: Scurry County HD; 100%; $0.242145 (Name, tax rate and percent of project)

Water District: N/A (Name, tax rate and percent of project)

Other (describe): WT College; 100%: $0.2655 (Name, tax rate and percent of project)

Other (describe): 312 Abatement, 100%, 2024-2033 (Name, tax rate and percent of project)

SECTION 10: The Property *(continued)*

5. List all state and local incentives as an annual percentage. Include the estimated start and end year of the incentive:

County: 312 Abatement, 100%, 2024-2033
(Incentive type, percentage, start and end year)

City: _____
(Incentive type, percentage, start and end year)

Hospital District: 312 Abatement, 100%, 2024-2033
(Incentive type, percentage, start and end year)

Water District: _____
(Incentive type, percentage, start and end yeart)

Other (describe): 312 Abatement, 100%, 2024-2033
(Incentive type, percentage, start and end year)

Other (describe): _____
(Incentive type, percentage, start and end year)

6. Is the project located entirely within the ISD listed in Section 1? ..... ☑ Yes ☐ No

   6a. If no, attach in **Tab 6** maps of the entire project (depicting all other relevant school districts) and additional information on the project scope and size. Please note that only the qualified property within the ISD listed in Section 1 is eligible for the limitation from this application. Please verify that all information in **Tabs 7** and **8**, Section 11, 12 and 13, and map project boundaries pertain to only the property within the ISD listed in Section 1.

7. 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

   7a. If yes, attach in **Tab 6** supporting documentation from the Office of the Governor.

SECTION 11: Texas Tax Code 313.021(1) Qualified 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/.

1. At the time of application, what is the estimated minimum qualified investment required for this school district? 30,000,000

2. What is the amount of appraised value limitation for which you are applying? 30,000,000

   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 within the project boundary 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 12: Texas Tax Code 313.021(2) Qualified Property

1. Attach a detailed description of the qualified property. [See §313.021(2)] The description must include:
   1a. a specific and detailed description of the qualified property for which you are requesting an appraised value limitation as defined by Tax Code §313.021 (**Tab 8**);
   1b. a description of any new buildings, proposed new improvements or personal property which you intend to include as part of your qualified property (**Tab 8**);
   1c. a map or site plan of the proposed qualified property showing the location of the new buildings or new improvements inside the project area boundaries within a vicinity map that includes school district, county and RZ boundaries (**Tab 11**); and
   1d. Will any of the proposed qualified property be used to renovate, refurbish, upgrade, maintain, modify, improve, or functionally replace existing buildings or existing improvements inside or outside the project area? ..... ☐ Yes ☑ No

   Note: Property used to renovate, refurbish, upgrade, maintain, modify, improve, or functionally replace existing buildings or existing improvements inside or outside the project area cannot be considered qualified property and will not be eligible for a limitation. See TAC §9.1051(16).

SECTION 12: Texas Tax Code 313.021(2) Qualified Property *(continued)*

2. Is the land upon which the new buildings or new improvements will be built part of the qualified property described by §313.021(2)(A)? ..... ☐ Yes ☑ No

   2a. If yes, attach complete documentation including:
   - a. legal description of the land (**Tab 9**);
   - b. each existing appraisal parcel number of the land on which the new improvements will be constructed, regardless of whether or not all of the land described in the current parcel will become qualified property (**Tab 9**);
   - c. owner (**Tab 9**);
   - d. the current taxable value of the land, attach estimate if land is part of larger parcel (**Tab 9**); and
   - e. a detailed map showing the location of the land with vicinity map (**Tab 11**).

3. Is the land on which you propose new construction or new improvements currently located in an area designated as a reinvestment zone under Tax Code Chapter 311 or 312 or as an enterprise zone under Government Code Chapter 2303? ..... ☐ Yes ☑ No

   3a. If yes, attach the applicable supporting documentation:
   - a. evidence that the area qualifies as a enterprise zone as defined by the Governor's Office (**Tab 16**);
   - b. legal description of reinvestment zone (**Tab 16**);
   - c. order, resolution or ordinance establishing the reinvestment zone (**Tab 16**);
   - d. guidelines and criteria for creating the zone (**Tab 16**); and
   - e. a map of the reinvestment zone or enterprise zone boundaries with vicinity map (**Tab 11**)

   3b. If no, submit detailed description of proposed reinvestment zone or enterprise zone with a map indicating the boundaries of the zone on which you propose new construction or new improvements to the Comptroller's office within 30 days of the application date.

   What is the anticipated date on which you will submit final proof of a reinvestment zone or enterprise zone? ..... December 2020

SECTION 13: Information on Property Not Eligible to Become Qualified Property

1. In **Tab 10**, attach a specific and detailed description of all **existing property within the project boundary**. This includes buildings and improvements existing as of the application review start date (the date the application is determined to be complete by the Comptroller). The description must provide sufficient detail to locate all existing property on the land that will be subject to the agreement and distinguish existing property from future proposed property.

2. In **Tab 10**, attach a specific and detailed description of all **proposed new property within the project boundary that will not become new improvements** as defined by TAC 9.1051. This includes proposed property that: functionally replaces existing or demolished/removed property; is used to maintain, refurbish, renovate, modify or upgrade existing property; or is affixed to existing property; or is otherwise ineligible to become qualified property. The description must provide sufficient detail to distinguish existing property (question 1) and all proposed new property that cannot become qualified property from proposed qualified property that will be subject to the agreement (as described in Section 12 of this application).

3. For the property not eligible to become qualified property within the project boundary in response to questions 1 and 2 of this section, provide the following supporting information in **Tab 10**:
   - a. maps and/or detailed site plan;
   - b. surveys;
   - c. appraisal district values and parcel numbers;
   - d. inventory lists;
   - e. existing and proposed property lists;
   - f. model and serial numbers of existing property; or
   - g. other information of sufficient detail and description.

4. Total estimated market value of existing property within the project boundary (that property described in response to question 1): ..... $ 0.00

5. In **Tab 10**, include an appraisal value by the CAD of all the buildings and improvements existing as of a date within 15 days of the date the application is received by the school district.

6. Total estimated market value of proposed property not eligible to become qualified property (that property described in response to question 2): ..... $ 0.00

Note: Investment for the property listed in question 2 may count towards qualified investment in Column C of Schedules A-1 and A-2, if it meets the requirements of 313.021(1). Such property **cannot** become qualified property on Schedule B.

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 1,106.50

   b. Qualifying job wage minimum option §313.021(5)(A)
   -110% of the average weekly wage for manufacturing jobs in the county is 1576.58

   c. Qualifying job wage minimum option §313.021(5)(B)
   -110% of the average weekly wage for manufacturing jobs in the region is 961.04

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? 49,974.00
7. What is the annual wage you are committing to pay for each of the new qualifying jobs you create on the qualified property? 49,974.00
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**.

TAB 2

Proof of Payment of Application Fee

Please find on the attached page, copy of the check for the $75,000 application fee to Snyder Independent School District.

Proof of payment of filing fee received by the Comptroller of Public Accounts per TAC Rule §9.1054 (b)(5)

(Page Inserted by Office of Texas Comptroller of Public Accounts)

TAB 3

Documentation of Combined Group membership under Texas Tax Code 171.0001(7), history of tax default, delinquencies and/or material litigation (if applicable)

IP Lumina, LLC will be reported on the 2020 report for IP Renewable Energy Holdings, LLC. Attached is page 1 of the 2019 report.

Response to Section 5 question 2a., documentation of combined group membership, received by CPA

TAB 4

Detailed Description of the Project

Provide 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.

IP Lumina, LLC (IP Lumina) is requesting an appraised value limitation from Snyder Independent School District (CISD) for the IP Lumina Project (the "Project"), a proposed solar powered electric generating facility in Scurry County. The proposed Snyder ISD Project (this application) will be constructed within a Reinvestment Zone that will be created by Scurry County. A map showing the location of the project is included in TAB 11.

The proposed Project is anticipated to have a capacity of approximately 360 MW located in Snyder ISD. The exact number and location of panels and inverters will vary depending upon ongoing siting analysis, manufacturer's availability, prices, and the final megawatt generating capacity of the Project when completed. Current estimated plans are to install approximately 1,160,000 PV modules and 515 inverters with all improvements located in Snyder ISD. The Applicant requests a value limitation for all facilities and equipment installed for the Project, including; solar modules/panels, tracking equipment, racking and mounting structures, O&M building, substation, inverters boxes, combiner boxes, meteorological equipment, foundations, roadways, paving, fencing, collection system, generation transmission lines, interconnection facilities and all necessary equipment for commercial generation of electricity.

Full construction of the Project is anticipated to begin in Q4 of 2022 with completion by December 31, 2023.

**NOTE:* The map in TAB 11 shows the potential locations of improvements within Snyder ISD boundaries; however, the final number of panels and inverters and the location of each of these facilities is dependent upon ongoing negotiations with power purchasers and other factors.

TAB 5

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

IP Renewable Energy Holdings, LLC, the parent of IP Lumina, LLC, is a national solar developer with project opportunities across the United States. The ability to enter into a value limitation agreement with Snyder ISD is a determining factor for constructing the project in Scurry County, Texas, as opposed to building and investing in another county, state or region. IP Renewable Energy Holdings LLC is considering investing in California and Colorado.

IP Renewable Energy Holdings, LLC is actively developing and constructing other projects throughout the US. The applicant requires this value limitation agreement in order to move forward with constructing this project in Texas. Specifically, without the available property tax incentives, the economics of the project become unappealing to investors and the likelihood of constructing the project becomes unlikely. The property tax liability of a project without tax incentives in Texas, including a value limitation agreement with Snyder ISD, lowers the return to investors and financiers to an unacceptable level at current contracted power rates under a power purchase agreement. As such, the applicant would not be able to finance and build its project without the property tax incentives. We want to avoid a situation where the applicant would be forced to have its development capital and prospective investment funds spent in other states where the rate of return is higher on a project basis.

However, the proposed site in Scurry County is a desirable business location and can provide electricity at a price that is competitive with other projects in Scurry County and elsewhere in Texas, assuming that the expected tax incentives, including a value limitation agreement, are obtained. Electric utilities and other wholesale electricity buyers are focused on providing low cost energy to their customers, and contracting for the sale of solar electricity is highly competitive. Receiving a value limitation agreement from Snyder ISD is vital to ensuring the economics justify building the project and placing it into commercial operation in Scurry County.

About IP Renewable Energy Holdings LLC

The IP Renewable Energy Holdings, LLC team has the collective experience in all phases of development across 60+ projects, and 2GWp of operating solar power with a total value of over $6 billion. Our team has been involved in almost $9B of successful debt and long-term equity financing for mid to late stage development projects. Our team has been successful together throughout the evolution of clean infrastructure, from the early days of kW scale solar, to pioneering 5-20MW projects and on to increasingly sophisticated and complex transactions of 100-500MW projects.

TAB 6

Description of how project is located in more than one district, including list of percentage in each district and, if determined to be a single unified project, documentation from the Office of the Governor (if applicable)

District	Percentage
Scurry County	100%
Scurry County Hospital	100%
Western Texas College	100%
Snyder ISD	100%

TAB 7

Description of Qualified Investment

IP Lumina, LLC plans to construct a 360 MW solar farm in Scurry County.

This application covers all qualified property in the reinvestment zone and the project boundary within Snyder ISD necessary for the commercial operations of the proposed solar farm described in Tab 4. Three hundred and sixty megawatts (360 MW) will be located in Snyder ISD. Panel placement is subject to change but for purposes of this application, the Project anticipates using approximately 1,160,000 PV modules or equivalent and 515 inverters.

This application covers all qualified investment and qualified property necessary for the commercial operations of the solar farm.

Qualified Investment and qualified property includes; solar modules/panels, tracking systems, racking and mounting structures, inverters boxes, combiner boxes, meteorological equipment, foundations, roadways, paving, fencing, O&M Building, substation, collection system, generation transmission line, interconnection facilities, control systems necessary for commercial generation of electricity and all and all necessary equipment for commercial generation of electricity.

*NOTE: The map in TAB 11 shows the potential locations of improvements within Snyder ISD boundaries; however, the final number of panels and inverters and the location of each of these facilities is dependent upon ongoing negotiations with power purchasers and other factors.

TAB 8

Description of Qualified Property

IP Lumina, LLC plans to construct a 360 MW solar farm in Scurry County.

This application covers all qualified property in the reinvestment zone and the project boundary within Snyder ISD necessary for the commercial operations of the proposed solar farm described in Tab 4. Three hundred and sixty megawatts (360 MW) will be located in Snyder ISD. Panel placement is subject to change but for purposes of this application, the Project anticipates using approximately 1,160,000 PV modules or equivalent and 515 inverters.

This application covers all qualified investment and qualified property necessary for the commercial operations of the solar farm.

Qualified Investment and qualified property includes; solar modules/panels, tracking systems, racking and mounting structures, inverters boxes, combiner boxes, meteorological equipment, foundations, roadways, paving, fencing, O&M Building, substation, collection system, generation transmission line, interconnection facilities, control systems necessary for commercial generation of electricity and all and all necessary equipment for commercial generation of electricity.

*NOTE: The map in TAB 11 shows the potential locations of improvements within Snyder ISD boundaries; however, the final number of panels and inverters and the location of each of these facilities is dependent upon ongoing negotiations with power purchasers and other factors.

TAB 9

Description of Land

Not Applicable

TAB 10

Description of all property not eligible to become qualified property (if applicable)

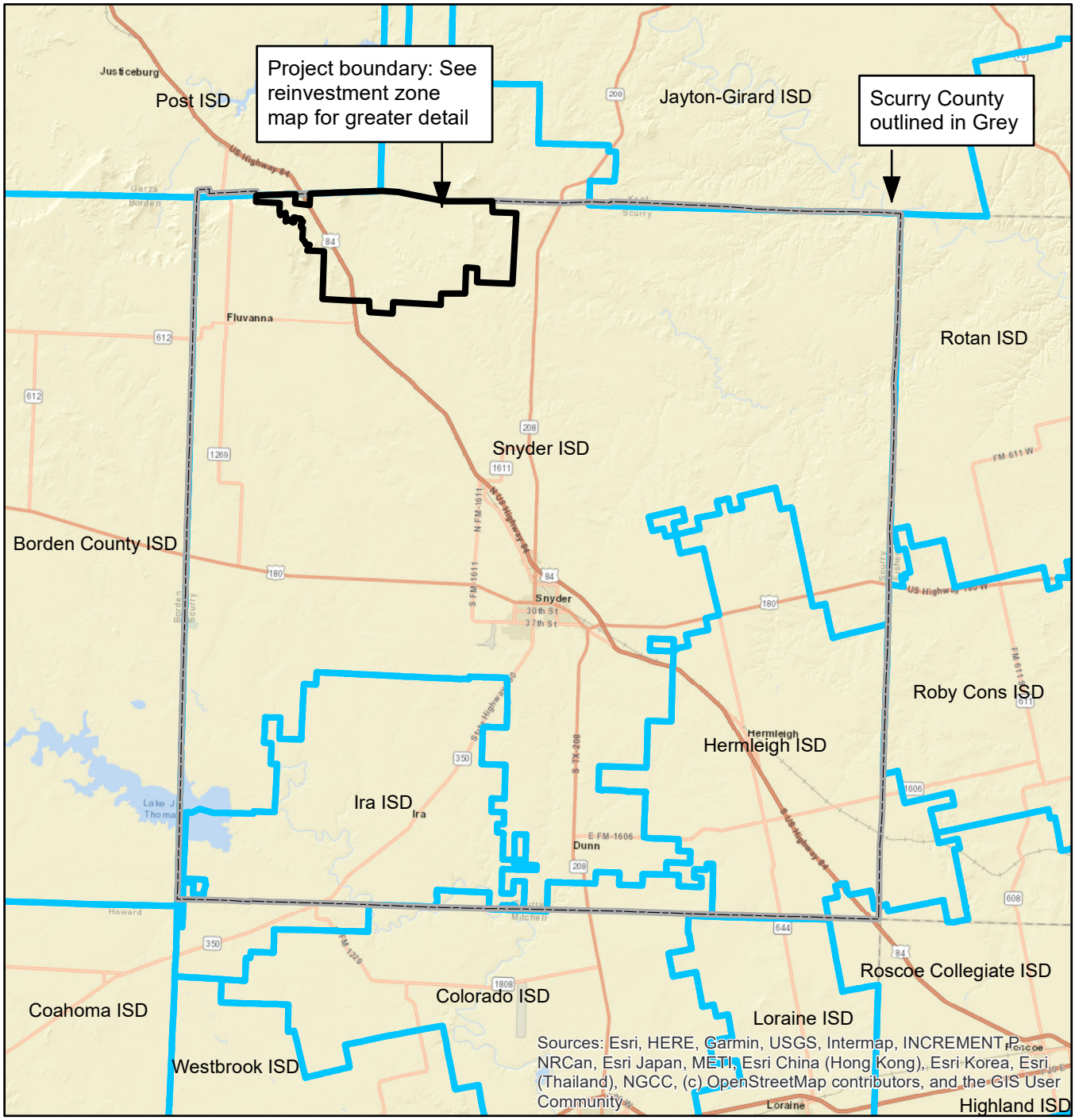
Not Applicable

TAB 11

Maps that clearly show:

a) *Project vicinity*
b) *Qualified investment including location of new building or new improvements*
c) *Qualified property including location of new building or new improvements*
d) *Existing property*
e) *Land location within vicinity map*
f) *Reinvestment or Enterprise Zone within vicinity map, showing the actual or proposed boundaries and size*

ISD Vicinity Map



Reinvestment Zone Boundary

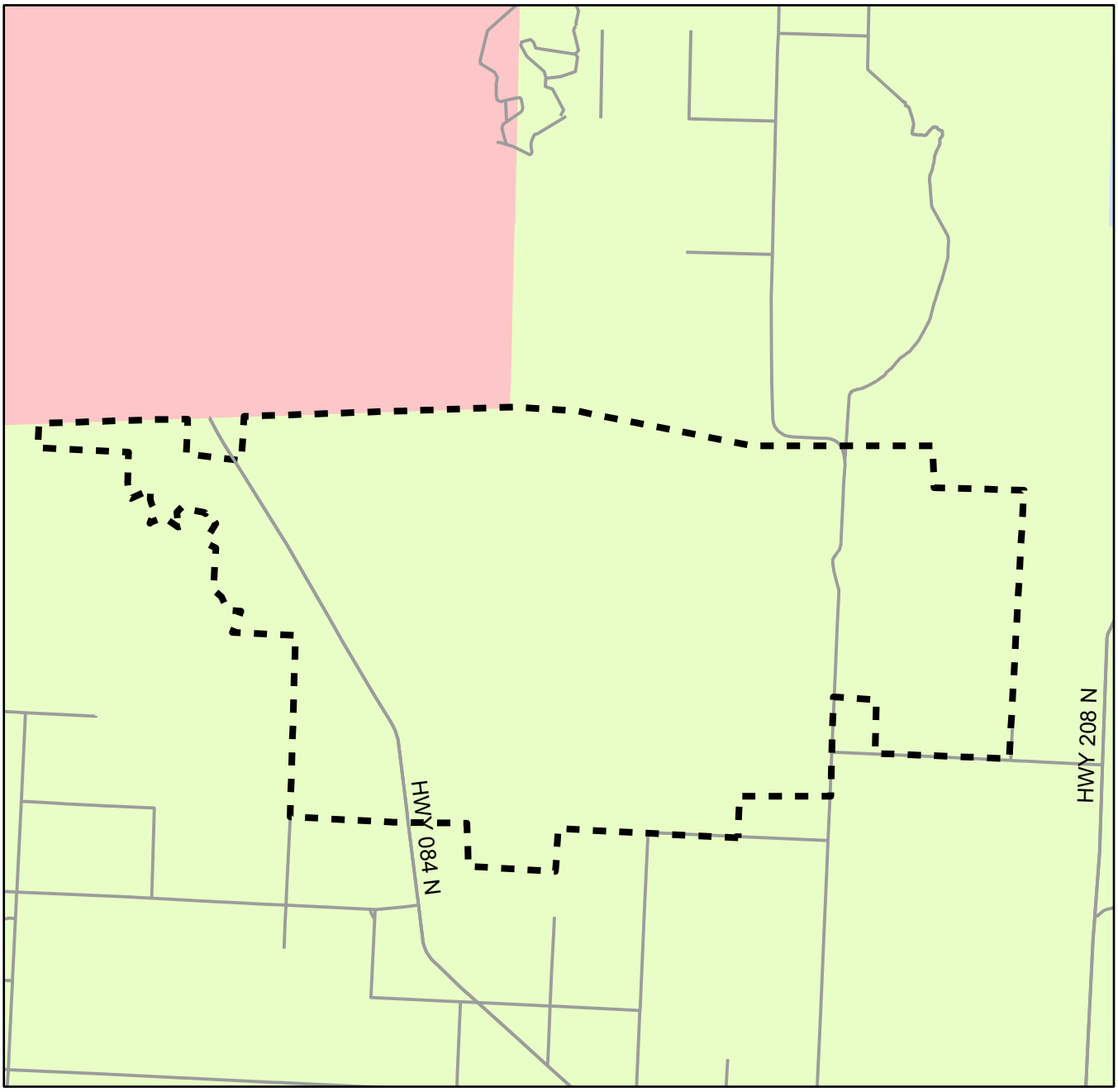
Scurry County

Independent School Districts

0 2.5 5 10 Miles

NORTH

Project Vicinity Map



Legend

Reinvestment Zone Boundary

Independent School Districts

Jayton-Girard ISD

Post ISD

Snyder ISD

County

All areas in view are within Scurry County, TX

0 1.25 2.5 5 Miles

NORTH

TAB 12

Request for Waiver of Job Creation Requirement and supporting information (if applicable)

See Attached

CUMMINGS WESTLAKE

PROPERTY TAX ADVISORS

September 10, 2020

Mr. Eddie Bland
Superintendent
Snyder Independent School District
2910 37th St.
Snyder, TX 79549

Re: Chapter 313 Jobs Waiver Request

Dear Superintendent Bland,

IP Lumina, LLC requests that the Snyder Independent School District's Board of Trustees waive the job requirement provision as allowed by Section 313.025(f-1) of the Tax Code. This waiver would be based on the school district's board findings that the jobs creation requirement exceeds the industry standard for the number of employees reasonably necessary for the operation of the facility of the property owner that is described in the application.

IP Lumina, LLC requests that the Board of Trustees make such a finding and waive the job creation requirement for 10 permanent jobs. The solar energy industry standard for committed jobs is one job per 300MW. In line with these industry standards for solar project's job requirements, IP Lumina, LLC, as a 360MW project, has committed to create two qualified jobs.

Solar projects create many full and part-time, but temporary jobs during the construction phase of the project. However, they require a relatively small number of highly skilled technicians to operate and maintain the project after commercial operation commences. The number of jobs committed to in this application is in line with the industry standards for a project this size. This is evidenced by previously filed limitation agreement applications by solar developers and by documentation related to the development and operation of solar electric generation facilities.

Sincerely,

Brandon Westlake
Senior Tax Consultant
Cummings Westlake LLC

16410 N Eldridge Pkwy | Tomball, Texas 77377
P: 713.266.4456 W: cwlp.net

TAB 13

Calculation of three possible wage requirements with TWC documentation

1) Scurry County average weekly wage for all jobs (all industries)

2) Scurry County average weekly wage for all jobs (manufacturing)

3) See attached Council of Governments Regional Wage Calculation and Documentation

IP LUMINA, LLC
TAB 13 TO CHAPTER 313 APPLICATION

SCURRY COUNTY
CHAPTER 313 WAGE CALCULATION - ALL JOBS - ALL INDUSTRIES

QUARTER	YEAR	AVG WEEKLY WAGES*	ANNUALIZED
FIRST	2020	$ 1,184	$ 61,568
SECOND	2019	$ 1,074	$ 55,848
THIRD	2019	$ 1,085	$ 56,420
FOURTH	2019	$ 1,083	$ 56,316
	AVERAGE	$ 1,106.50	$ 57,538

SCURRY COUNTY
CHAPTER 313 WAGE CALCULATION - MANUFACTURING JOBS

QUARTER	YEAR	AVG WEEKLY WAGES*	ANNUALIZED
FIRST	2020	$ 1,335	$ 69,420
SECOND	2019	$ 1,454	$ 75,608
FIRST	2019	$ 1,344	$ 69,888
FOURTH	2019	$ 1,600	$ 83,200
	AVERAGE	$ 1,433.25	$ 74,529
	X	110%	110%
		$ 1,576.58	$ 81,982

CHAPTER 313 WAGE CALCULATION - REGIONAL WAGE RATE

	YEAR	AVG WEEKLY WAGES*	ANNUALIZED
West Central	2018	$ 874	$ 45,431
	X	110%	110%
		$ 961.04	$ 49,974

**** SEE ATTACHED TWC DOCUMENTATION***

Year	Period	Area	Ownership	Industry Code	Industry	Average Weekly Wage
2019	01	Scurry	Total All	10	Total, All Industries	1,145
2019	02	Scurry	Total All	10	Total, All Industries	1,074
2019	03	Scurry	Total All	10	Total, All Industries	1,085
2019	04	Scurry	Total All	10	Total, All Industries	1,083
2020	01	Scurry	Total All	10	Total, All Industries	1,184

Year	Period	Area	Ownership	Industry Code	Industry	Average Weekly Wage
2019	01	Scurry	Private	31-33	Manufacturing	1,372
2019	02	Scurry	Private	31-33	Manufacturing	1,454
2019	03	Scurry	Private	31-33	Manufacturing	1,344
2019	04	Scurry	Private	31-33	Manufacturing	1,600
2020	01	Scurry	Private	31-33	Manufacturing	1,335

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

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

TAB 14

Schedules A1, A2, B and C completed and signed Economic Impact (if applicable)

See attached Schedules A1, A2, B and C

Schedule A1: Total Investment for Economic Impact (through the Qualifying Time Period)

Date 8/20/2020
Applicant Name IP Lumina, LLC
ISD Name Snyder ISD

Form 50-296A
Revised February 2020

PROPERTY INVESTMENT AMOUNTS

(Estimated Investment in each year. Do not put cumulative totals.)

				Column A	Column B	Column C	Column D	Column E
	Year	**School Year** (YYYY-YYYY)	**Tax Year** (Fill in actual tax year below) YYYY	New investment (original cost) in **tangible personal property** placed in service during this year that will become Qualified Property	New investment made during this year in **buildings or permanent nonremovable components of buildings** that will become Qualified Property	Other new investment made during this year that will not become Qualified Property [SEE NOTE]	Other new investment made during this year that may become Qualified Property [SEE NOTE]	**Total Investment** (Sum of Columns A+B+C+D)
Investment made before filing complete application with district	--	Year preceding the first complete tax year of the qualifying time period (assuming no deferrals of qualifying time period)	2022	Not eligible to become Qualified Property			[The only other investment made before filing complete application with district that may become Qualified Property is land.]	
Investment made after filing complete application with district, but before final board approval of application				0	0	0	0	0
Investment made after final board approval of application and before Jan. 1 of first complete tax year of qualifying time period				0	0	0	0	0
	QTP1	2023-2024	2023	153,000,000	500,000	0	0	153,500,000
	QTP2	2024-2024	2024	0	0	0	0	0
Total Investment through Qualifying Time Period [ENTER this row in Schedule A2]				153,000,000	500,000	0	0	153,500,000
				Enter amounts from TOTAL row above in Schedule A2				
Total Qualified Investment (sum of green cells)				153,500,000				

For All Columns: List amount invested each year, not cumulative totals.

Column A: This represents the total dollar amount of planned investment in tangible personal property. Only include estimates of investment for "replacement" property if the property is specifically described in the application.
Only tangible personal property that is specifically described in the application can become qualified property.

Column B: The total dollar amount of planned investment each year in buildings or nonremovable component of buildings.

Column C: Dollar value of other investment that may affect economic impact and total value. Examples of other investment that will not become qualified property include investment meeting the definition of 313.021(1) but not creating a new improvement as defined by TAC 9.1051. This is proposed property that functionally replaces existing property; is used to maintain, refurbish, renovate, modify or upgrade existing property; or is affixed to existing property—described in SECTION 13, question #5 of the application.

Column D: Dollar value of other investment that may affect economic impact and total value. Examples of other investment that may result in qualified property are land or professional services.

Total Investment: Add together each cell in a column and enter the sum in the blue total investment row. Enter the data from this row into the first row in Schedule A2.

Qualified Investment: For the green qualified investment cell, enter the sum of all the green-shaded cells.

Schedule A2: Total Investment for Economic Impact (including Qualified Property and other investments)

Date 8/20/2020
Applicant Name IP Lumina, LLC
ISD Name Snyder ISD

Form 50-296A
Revised February 2020

PROPERTY INVESTMENT AMOUNTS								
(Estimated Investment in each year. Do not put cumulative totals.)								
				Column A	Column B	Column C	Column D	Column E
	Year	School Year (YYYY-YYYY)	Tax Year (Fill in actual tax year below) YYYY	New investment (original cost) in **tangible personal property** placed in service during this year that will become Qualified Property	New investment made during this year in **buildings or permanent nonremovable components of buildings** that will become Qualified Property	Other investment made during this year that will not become Qualified Property [SEE NOTE]	Other investment made during this year that will become Qualified Property [SEE NOTE]	**Total Investment** (A+B+C+D)
Total Investment from Schedule A1*	--	**TOTALS FROM SCHEDULE A1**		**Enter amounts from TOTAL row in Schedule A1 in the row below**				
				153,000,000	500,000	0	0	153,500,000
Each year prior to start of value limitation period** *Insert as many rows as necessary*	0	2022-2023	2022					
	0	2023-2024	2023					
Value limitation period***	1	2024-2025	2024					0
	2	2025-2026	2025					
	3	2026-2027	2026					
	4	2027-2028	2027					
	5	2028-2029	2028					
	6	2029-2030	2029					
	7	2030-2031	2030					
	8	2031-2032	2031					
	9	2032-2033	2032					
	10	2033-2034	2033					
Total Investment made through limitation				153,000,000	500,000	0	0	153,500,000
Continue to maintain viable presence	11	2034-2035	2034					
	12	2035-2036	2035					
	13	2036-2037	2036					
	14	2037-2038	2037					
	15	2038-2039	2038					
Additional years for 25 year economic impact as required by 313.026(c)(1)	16	2039-2040	2039					
	17	2040-2041	2040					
	18	2041-2042	2041					
	19	2042-2043	2042					
	20	2043-2044	2043					
	21	2044-2045	2044					
	22	2045-2046	2045					
	23	2046-2047	2046					
	24	2047-2048	2047					
	25	2048-2049	2048					

* All investments made through the qualifying time period are captured and totaled on Schedule A1 [blue box] and incorporated into this schedule in the **first row.**

** Only investment made during deferrals of the start of the limitation (after the end of qualifying time period but before the start of the Value Limitation Period) should be included in the "year prior to start of value limitation period" row(s). If the limitation starts at the end of the qualifying time period or the qualifying time period overlaps the limitation, no investment should be included on this line.

*** If your qualifying time period will overlap your value limitation period, do not also include investment made during the qualifying time period in years 1 and/or 2 of the value limitation period, depending on the overlap. Only include investments/years that were **not** captured on Schedule A1.

For All Columns: List amount invested each year, not cumulative totals. Only include investments in the remaining rows of Schedule A2 that were not captured on Schedule A1.

Column A: This represents the total dollar amount of planned investment in tangible personal property. Only include estimates of investment for "replacement" property if the property is specifically described in the application.
Only tangible personal property that is specifically described in the application can become qualified property.

Column B: The total dollar amount of planned investment each year in buildings or nonremovable component of buildings.

Column C: Dollar value of other investment that may affect economic impact and total value. Examples of other investment that will not become qualified property include investment meeting the definition of 313.021(1) but not creating a new improvement as defined by TAC 9.1051. This is proposed property that functionally replaces existing property; is used to maintain, refurbish, renovate, modify or upgrade existing property; or is affixed to existing property—described in SECTION 13, question #5 of the application.

Column D: Dollar value of other investment that may affect economic impact and total value. Examples of other investment that may result in qualified property are land or professional services.

Schedule B: Estimated Market And Taxable Value (of Qualified Property Only)

Date 8/20/2020
Applicant Name IP Lumina, LLC
ISD Name Snyder ISD

Form 50-296A
Revised February 2020

				Qualified Property			Estimated Taxable Value		
	Year	School Year (YYYY-YYYY)	Tax Year (Fill in actual tax year) YYYY	Estimated Market Value of Land	Estimated Total Market Value of new buildings or other new improvements	Estimated Total Market Value of tangible personal property in the new buildings or "in or on the new improvements"	Market Value less any exemptions (such as pollution control) and before limitation	Final taxable value for I&S after all reductions	Final taxable value for M&O after all reductions
Each year prior to start of Value Limitation Period *Insert as many rows as necessary*	0	2022-2023	2023	0	0	0	0	0	0
Value Limitation Period	1	2024-2025	2024	0	487,500	98,532,000	99,019,500	99,019,500	30,000,000
	2	2025-2026	2025	0	475,310	89,964,000	90,439,310	90,439,310	30,000,000
	3	2026-2027	2026	0	463,430	81,396,000	81,859,430	81,859,430	30,000,000
	4	2027-2028	2027	0	451,840	71,757,000	72,208,840	72,208,840	30,000,000
	5	2028-2029	2028	0	440,540	62,118,000	62,558,540	62,558,540	30,000,000
	6	2029-2030	2029	0	429,530	52,479,000	52,908,530	52,908,530	30,000,000
	7	2030-2031	2030	0	418,790	41,769,000	42,187,790	42,187,790	30,000,000
	8	2031-2032	2031	0	408,320	32,130,000	32,538,320	32,538,320	30,000,000
	9	2032-2033	2032	0	398,110	25,704,000	26,102,110	26,102,110	26,102,110
	10	2033-2034	2033	0	388,160	22,491,000	22,879,160	22,879,160	22,879,160
Continue to maintain viable presence	11	2034-2035	2034	0	378,460	22,491,000	22,869,460	22,869,460	22,869,460
	12	2035-2036	2035	0	369,000	22,491,000	22,860,000	22,860,000	22,860,000
	13	2036-2037	2036	0	359,780	22,491,000	22,850,780	22,850,780	22,850,780
	14	2037-2038	2037	0	350,790	22,491,000	22,841,790	22,841,790	22,841,790
	15	2038-2039	2038	0	342,020	22,491,000	22,833,020	22,833,020	22,833,020
Additional years for 25 year economic impact as required by 313.026(c)(1)	16	2039-2040	2039	0	333,470	22,491,000	22,824,470	22,824,470	22,824,470
	17	2040-2041	2040	0	325,130	22,491,000	22,816,130	22,816,130	22,816,130
	18	2041-2042	2041	0	317,000	22,491,000	22,808,000	22,808,000	22,808,000
	19	2042-2043	2042	0	309,080	22,491,000	22,800,080	22,800,080	22,800,080
	20	2043-2044	2043	0	301,350	22,491,000	22,792,350	22,792,350	22,792,350
	21	2044-2045	2044	0	293,820	22,491,000	22,784,820	22,784,820	22,784,820
	22	2045-2046	2045	0	286,470	22,491,000	22,777,470	22,777,470	22,777,470
	23	2046-2047	2046	0	279,310	22,491,000	22,770,310	22,770,310	22,770,310
	24	2047-2048	2047	0	272,330	22,491,000	22,763,330	22,763,330	22,763,330
	25	2048-2049	2048	0	265,520	22,491,000	22,756,520	22,756,520	22,756,520

Notes: Market value in future years is good faith estimate of future taxable value for the purposes of property taxation.
Only include market value for eligible property on this schedule.

Schedule C: Employment Information

Date 8/20/2020

Applicant Name IP Lumina, LLC

ISD Name Snyder ISD

Form 50-296A

Revised February 2020

				Construction		Non-Qualifying Jobs	Qualifying Jobs	
				Column A	**Column B**	**Column C**	**Column D**	**Column E**
	Year	**School Year** (YYYY-YYYY)	**Tax Year** (Actual tax year) YYYY	Number of Construction FTE's	**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)	Annual wage of new qualifying jobs
Each year prior to start of Value Limitation Period *Insert as many rows as necessary*	0	2022-2023	2022	N/A	N/A	0	0	0
	0	2023-2024	2023	250 FTE	52,500	0	0	0
Value Limitation Period *The qualifying time period could overlap the value limitation period.*	1	2024-2025	2024	N/A	N/A	0	2	49,974
	2	2025-2026	2025	N/A	N/A	0	2	49,974
	3	2026-2027	2026	N/A	N/A	0	2	49,974
	4	2027-2028	2027	N/A	N/A	0	2	49,974
	5	2028-2029	2028	N/A	N/A	0	2	49,974
	6	2029-2030	2029	N/A	N/A	0	2	49,974
	7	2030-2031	2030	N/A	N/A	0	2	49,974
	8	2031-2032	2031	N/A	N/A	0	2	49,974
	9	2032-2033	2032	N/A	N/A	0	2	49,974
	10	2033-2034	2033	N/A	N/A	0	2	49,974
Years Following Value Limitation Period	11 through 25	2034-2049	2034-2048	N/A	N/A	0	2	49,974

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

TAB 15

Economic Impact Analysis, other payments made in the state or other economic information (if applicable)

None

TAB 16

Description of Reinvestment Zone or Enterprise Zone, including:

a) *Evidence that the area qualifies as an enterprise zone as defined by the Governor's office*
b) *Legal description of reinvestment zone**
c) *Order, resolution, or ordinance established the* reinvestment zone*
d) *Guidelines and criteria for creating the zone**

a) Not applicable
b) Will Submit once County creates Reinvestment Zone
c) Will Submit once County creates Reinvestment Zone
d) See Attached

EXHIBIT "A"

GUIDELINES AND CRITERIA FOR GRANTING TAX ABATEMENTS IN REINVESTMENT ZONES

Scurry County

For projects located outside the city limits of the City of Snyder, Texas

I. PURPOSE

The Development Corporation of Snyder, Inc., City of Snyder, Scurry County, and Western Texas College, hereinafter referred to as "DCOS", City", "County", and "WTC" respectively are committed to the promotion of quality development in all parts of the City/community and to improving the quality of life for its citizens. In order to help meet these goals, DCOS will consider recommending tax phase-in, which includes the designation of reinvestment zones, application for tax abatements and entering into tax abatement agreements, to stimulate growth and development. It is the intent of DCOS, the City, the County, and WTC that such incentives will be provided in accord with the procedures and criteria outlined in this document. However, nothing in these Guidelines and Criteria shall imply or suggest to be construed to imply or suggest that tax entities are under any obligation to provide any incentives to any applicant. All such applicants for tax phase-in incentives shall be considered on an individual basis for both the qualification for abatement and the amount of any abatement.

II. DEFINITIONS

The attached Glossary is a list of words with their definitions that are found in this document, and the Glossary is incorporated herein by reference.

III. GUIDELINES AND CRITERIA

In order to be eligible for designation as a reinvestment zone and receive tax abatement, the planned improvement as a minimum must meet the following:

(a) Be an Authorized Facility. A facility may be eligible for abatement if it is a (n):

- Aquaculture/Agriculture Facility,
- Distribution Center Facility,
- Manufacturing Facility,
- Office Building,
- Regional Entertainment/Tourism Facility,
- Research Facility,
- Regional Service Facility,
- Historic Building in designated area,
- Wind Energy Facility,
- Residential Commercial Property,
- Renewable Energy Facility, or
- Other Basic Industry.

(b) The project must add at least $100,000 to the tax rolls, or create at least 5 new full-time jobs to the tax roll of eligible property except in regards to the historic downtown area where there are no minimums.

In consideration of the request for designation as a reinvestment zone and to receive tax abatement, the following factors will also be considered:

(1) Jobs. The projected new jobs created including the number of jobs, the retention of existing jobs, the type of jobs, the average payroll, the total payroll and the number of local persons hired.

(2) Fiscal Impact. The amount of real and personal property value that will be added to the tax roll for both eligible and ineligible property, the amount of direct sales tax that will be generated, the infrastructure improvements by the City/County that will be required by the facility, the infrastructure improvements made by the facility, and the compatibility of the project with the City's/County's master plan for development.

(3) Community Impact.

- The Pollution, if any, as well as other negative environmental impacts affecting the health and safety of the community that will be created by the project.;
- The revitalization of a depressed area;
- The business opportunities of existing local vendors;
- The alternative development possibilities for proposed site;
- The impact on other taxing entities; and/or
- Whether the improvement is expected to solely or primarily have the effect of transferring employment from one part of Scurry County to another.

IV. ABATEMENT AUTHORIZED

(a) Authorized Date. A facility shall be eligible for tax abatement if it has applied for such abatement prior to the commencement of construction; provided, that such facility meets the criteria granting tax abatement in reinvestment zones created in Scurry County pursuant to these Guidelines and Criteria for a period not to exceed ten years.

(b) Creation of New Value. Abatement may only be granted for the additional value of eligible property improvements made subsequent to the filing of an application for tax abatement and specified in the abatement agreement between the County and/or City and/or WTC and the property owner or Lessee (and lessor if required pursuant to IV (E), subject to such limitations as the Guidelines and Criteria may require.

(c) New and Existing Facilities. Abatement may be granted for new facilities and improvements to existing facilities for purposes of modernization or expansion. If the modernization project includes facility replacement, the abated value shall be the value of the new unit(s) less than value of the old unit(s).

(d) Eligible Property. Abatement may be extended to the value of the following: new, expanded or modernized buildings and structures, fixed machinery and equipment, site improvements plus that office space and related fixed improvements necessary to the operation and administration of the facility, and all other real and tangible personal property permitted by Chapter 312 of the Texas Tax Code.

(e) Ineligible Property. The following types of property shall be fully taxable and ineligible for abatement:

- Base value of real estate as valued by the appraisal district in the year immediately preceding abatement,
- Animals,
- Inventories,
- Supplies,
- Tools,
- Furnishings and other forms of moveable personal property,
- Vehicles,
- Vessels,
- Aircraft,
- Housing or residential property (except residential commercial property built for resale),
- Hotel/motels,
- Fauna,
- Flora,
- Retail facilities, except when housed in an historic structure, within the designated downtown district,
- Property to be rented or leased except as provided in Part IV (f),
- Any improvements including those to produce, store or distribute natural gas or fluids that are not integral to the operation of the facility,
- Property owned or used by the State of Texas or its political subdivisions or by any organization owned, operated or directed by a political subdivision of the State of Texas.

(f) Owned/Leased Facilities. If a leased facility is granted an abatement, the agreement shall be executed with the lessor and lessee.

(g) Value and Term of Abatement. Abatement shall be granted effective with the January 1 valuation date immediately following the date of execution of the agreement. The value of new eligible properties shall be abated according to the approved agreement between applicant and the governing body. The governing body, in its sole discretion, shall determine the amount of any abatement. The table in the attached Exhibit "A", incorporated herein by reference, shall be the maximum abatement available, the actual amount of abatement granted is in the sole discretion of the Scurry County Commissioners Court, but shall not exceed said maximum.

The abatement may be extended through an initial agreement and a subsequent agreement as may be required to comply with state law regarding the term of the reinvestment zone.

(h) Construction in Progress. If a qualifying facility has not been placed in service as of January 1 following execution of the abatement agreement, the taxpayer may apply for a one year extension of the term of abatement. Said extension must be applied for prior to the end of the calendar year in which the abatement agreement is executed.

(i) Taxability. From the execution of the abatement contract to the end of the agreement period, taxes shall be payable as follows:

(1) The value of ineligible property as provided in Part IV (e) shall be fully taxable.

(2) The base year value of existing eligible property as determined each year shall be fully taxable.

(3) The additional value of new eligible property shall be taxable in the manner described in Part IV (g).

V. APPLICATION FOR TAX ABATEMENT

(a) Any present or potential owner of lessee of taxable property in Scurry County may request the creation of reinvestment zone and tax abatement by filing written request with either the DCOS or applicable taxing entity.

(b) The application shall consist of a completed application form accompanied by:

(1) A general description of the proposed use and the general nature and extent of the modernization, expansion or new improvements to the undertaken;

(2) A descriptive list of the improvements which will be a part of the facility;

(3) A map and property description or a site plan;

(4) A time schedule for undertaking and completing the planned improvements;

(5) In the case of modernizing existing facilities, a statement of the assessed value of the facility, separately stated for real and personal property, shall be given for the tax year immediately preceding the application; and,

(6) The application form may require such financial and other information as deemed appropriate for evaluating the financial capacity and other factors of the applicant.

(c) Upon receipt of a completed application, the jurisdiction receiving such application shall notify in writing the presiding officer of the legislative body of each affected jurisdiction. Before acting upon the application, the jurisdiction receiving such application shall through public hearings afford the applicant and the designated representative of any affected jurisdiction the opportunity to show cause why the abatement should or should not be granted. Notice of public hearings shall be clearly identified on an agenda of the legislative body of the jurisdiction receiving such application to be posted at least seventy-two (72) hours prior to the hearing.

(d) The jurisdiction receiving the application shall approve or disapprove the application for tax abatement within forty-five (45) days after receipt of the application. The presiding officer of the legislative body of the jurisdiction receiving such application shall notify the applicant of the approval or disapproval promptly thereafter.

(e) A request for a reinvestment zone for the purpose of abatement shall not be granted if the jurisdiction receiving the application finds that the request for the abatement was filed after the commencement of construction, alteration, or installation of improvements related to a proposed modernization expansion of new facility.

(f) Variance. Requests for variance from the provisions of Subsections (a) through (e) of Part V may be made in written form to the presiding officer of the jurisdiction receiving the application. Such request shall include a complete description of the circumstances explaining why the applicant should be granted a variance. Approval of a request for variance requires a three-fourths (3/4) vote of the governing body of the affected jurisdiction as provided in State Statutes.

VI. PUBLIC HEARING

(a) Should any affected jurisdiction be able to show cause in the public hearing why the granting of abatement will have a substantial adverse effect on its bonds, tax revenue, service incapacity or the provision of service, that showing shall be reason for the jurisdiction receiving the application to deny the granting of ad valorem tax abatement.

(b) Neither a reinvestment zone nor an abatement agreement shall be authorized if it is determined that:

(1) There would be a substantial adverse effect on the provision of a government service or tax base of an affected jurisdiction.

(2) The applicant has insufficient financial capacity.

(3) Planned or potential use of the property would constitute a hazard to public safety, health or morals.

(4) Planned or potential use of the property violates other governmental codes or laws.

VII. AGREEMENT

(a) After approval of the tax abatement application, each affected jurisdiction shall formally pass a resolution and execute an agreement with the owner and/or lessee of the facility which shall include:

(1) Estimated value to be abated and the base year value.

(2) Percent of value to be abated each year as provided in Part IV (g) of these Guidelines and Criteria.

(3) The commencement date and the termination date of abatement.

(4) The proposed use of the facility, nature of construction, time schedule for undertaking and completing the planned improvements, map, property description and improvements list as provided in Part V of these Guidelines and Criteria.

(5) Contractual obligations in the event of default, violation of terms or conditions, delinquent taxes recapture, administration and assignment as provided herein and other provisions that may be required for uniformity or by state law.

(6) Amount of investment and/or average number of jobs involved for the period of abatement.

(7) Said contract shall meet all of the requirements of Texas Tax Code Sec. 312 et seq.

(b) Such agreement shall be executed within thirty (30) days after the later of the date applicant has forwarded all necessary information to the jurisdiction receiving the application or the date of the approval of the application.

(c) Each affected jurisdiction shall make its own determination of abatement which shall not bind any other affected jurisdiction.

VIII. RECAPTURE

(a) In the event that the facility is completed and begins producing product or service, but subsequently discontinues producing product or service for any reason excepting fire, explosion or other casualty or accident or natural disaster for a period of more than one (1) year during the abatement period, then the agreement shall terminate and so shall the abatement of taxes for the calendar year during which the agreement is terminated. The taxes otherwise abated for that calendar year shall be paid to each affected jurisdiction within the County within sixty (60) days from the date of termination.

(b) Should the jurisdiction establishing a reinvestment zone and signing a tax abatement agreement determine that a company or individual is in default according to the terms and conditions of its agreement, the jurisdiction shall notify the company or individual in writing at the address stated in the agreement, and if such is not cured within sixty (60) days from the date of such notice ("Cure Period"), then the agreement shall be terminated. Further, it will be a default under a tax abatement granted pursuant to these Guidelines and Criteria if the owner of the eligible property subject to the abatement is delinquent in paying and undisputed taxes to any taxing authority in Scurry County, Texas.

(c) In the event that the company or individual:

(1) allows its ad valorem taxes owed the County or an affected jurisdiction to become delinquent and fails to timely and properly follow the legal procedures for their protest and/or contest; or

(2) violates any of the terms and conditions of the abatement agreement and fails to cure same during the Cure Period;

The agreement shall be terminated and all taxes previously abated by virtue of the agreement will be recaptured and paid within sixty (60) days of the termination.

IX. ADMINISTRATION

(a) The Chief Appraiser of the Scurry County Appraisal District shall annually determine an assessment of the real and personal property comprising the reinvestment zone. Each year the company or individual receiving abatement shall furnish the assessor with such information as may be necessary for abatement, including the number of new or retained employees associated with the facility. Once value has been established, the Chief Appraiser shall notify the affected jurisdictions which levy taxes on the amount of the assessment.

(b) The agreement shall stipulate that employees and/or designated representatives of the jurisdiction establishing the reinvestment zone and entering into a tax abatement agreement will have access to the reinvestment zone during the term of the abatement to inspect the facility to determine if the terms and conditions of the agreement are being met. All inspections will be made only after the giving of twenty-four (24) hours prior notice and will only be conducted in such manner as to not unreasonably interfere with the construction and/or operation of the facility. All County inspections will be made with one or more representatives of the company or individual and in accordance with its safety standards.

(c) Upon completion of construction the jurisdiction establishing the reinvestment zone and entering into a tax abatement agreement shall annually evaluate each facility and report possible violations of the contract and/or agreement to each affected jurisdiction.

(d) All proprietary information acquired by an affected jurisdiction for purposes of monitoring compliance with the terms and conditions of an abatement agreement shall be considered confidential.

X. ASSIGNMENT

(a) Abatement may be transferred and assigned by the holder to a new owner or lessee of the same facility upon the approval by resolution of each affected jurisdiction, subject to the financial capacity of the assignee and provided that all conditions and obligations in the abatement agreement are guaranteed by the execution of a new contractual agreement with each affected jurisdiction.

(b) The contractual agreement with the new owner or lessee shall not exceed the termination date of the abatement agreement with the original owner and/or lessee.

(c) No assignment or transfer shall be approved if the parties to the existing agreement, the new owner or new lessee are liable to any affected jurisdiction for outstanding taxes or other obligations.

(d) Approval shall not be unreasonably withheld.

XI. SUNSET PROVISION

(a) These Guidelines and Criteria are effective October, 18, **2016** and will remain in force for two (2) years, at which time all reinvestment zones and tax abatement contracts created pursuant hereto will be reviewed by each affected jurisdiction to determine whether the goals have been achieved. Based on that review, these Guidelines and Criteria may be modified, renewed or eliminated, providing that such actions shall not affect existing contracts.

(b) These Guidelines and Criteria do not amend any existing Industrial District Contracts or agreements with the owners of real property in areas deserving of specific attention as agreed by the affected jurisdiction.

(c) Prior to the date for review, as defined above, these Guidelines and Criteria may be modified by a three-fourths (3/4) vote of the affected taxing authorities, as provided for under the laws of the State of Texas.

XII. SEVERABILITY AND LIMITATIONS

(a) In the event that any section, clause, sentence, paragraph or any part of these Guidelines and Criteria shall for any reason, be adjudged by any court of competent jurisdiction to be invalid, such invalidity shall not affect, impact, or invalidate the remainder of these Guidelines and Criteria.

(b) Property that is in a reinvestment zone that is owned or leased by the following cannot benefit from a tax abatement:

(1) A member of the governing body of a municipality or by a member of a planning board or commission of the municipality; or

(2) A member of the Commissioners Court or a member of a planning board or commission of the County is excluded from property tax abatement.

(c) If these Guidelines and Criteria have omitted any mandatory requirements of the applicable tax abatement laws of the State of Texas, then such requirements are hereby incorporated as a part of this Guideline Statement.

GLOSSARY

(a) "Abatement" means the full or partial exemption from ad valorem taxes of certain real property in a reinvestment zone designated by the County or a City for economic development purposes.

(b) "Aquaculture/Agriculture Facility" means buildings, structures and major earth structure improvements, including fixed machinery and equipment, the primary purpose of which is of food and/or fiber products in commercially marketable quantities.

(c) "Affected jurisdiction" means Scurry County and any municipality, or school district, the majority of which is located in Scurry County that levies ad valorem taxes upon and/or provides services to property located within the proposed or existing reinvestment zone designated by Scurry County or any municipality.

(d) "Agreement" means a contractual agreement between a property owner and/or lessee and the affected jurisdiction for the purpose of tax abatement.

(e) "Base year value" means the assed value of eligible property on January 1 preceding the execution of the agreement plus the agreed upon value of eligible property improvements made after January 1 but before the filing of an application for tax abatement.

(f) "Deferred maintenance" means improvements necessary for continued operations which do not improve productivity or alter the process technology.

(g) "Distribution Center Facility" means building and structures, including machinery and equipment, used or to be primarily to receive, store, service or distribute goods or materials owned by the facility, from which a majority of revenues generated by activity at the facility are derived from outside Scurry County.

(h) "Expansion" means the addition of buildings, structures, machinery or equipment for purposes of increasing production capacity.

(i) "Facility" means property improvements completed or in the process of construction which together compromise an integral whole.

(j) "Manufacturing Facility" means buildings and structures, including machinery and equipment, the primary purpose of which is or will be the manufacture of tangible goods or materials or the processing of such goods or materials by physical or chemical change.

(k) "Modernization" means the upgrading and/or replacement of existing facilities which increases the productive input or output, updates the technology or substantially lowers the unit cost of the operation. Modernization may result from the construction, alteration or installation of buildings, structures, fixed machinery or equipment. It shall not be for the purpose of reconditioning, refurbishing or repairing.

(l) "New Facility" means improvements to real estate previously undeveloped which is placed into service by means other than or in conjunction with expansion or modernization.

(m) "New Job(s)" means a newly created employment position on a full-time permanent basis. Two or more part-time permanent employees totaling an average of not less than 40 hours per week may be considered as one full-time permanent employee.

(n) "Office Building" means a new office building.

(o) "Other Basic Industry" means buildings and structures, including fixed machinery and equipment not elsewhere described, used or to be used for the production of products or services which serve a market primarily outside the County and results in the creation of new permanent jobs and new wealth in the County.

(p) "Regional Entertainment/Tourism Facility" means buildings and structures, including fixed machinery and equipment, used or to be used to provide entertainment and/or tourism related services, from which a majority of revenues generated by activity at the facility are derived from outside Scurry County.

(q) "Research Facility" means buildings and structures, including fixed machinery and equipment, used or to be used primarily for research or experimentation to improve or develop new tangible goods or materials or to improve or develop the production processes thereto.

(r) "Residential Commercial Property" means a minimum of five single family dwellings, constructed in a single subdivision, constructed for immediate resale and does not include property constructed for rental.

(s) "Regional Service Facility" means buildings and structures, including fixed machinery and equipment, used or to be used to provide a service from which a majority of revenues generated by activity at the facility are derived from outside Scurry County.

(t) "Wind Energy Facility" means buildings and structures, including but not limited to wind energy generating turbines, electric transmission lines, electric power substations, electrical gathering equipment, communications systems and roads, fixed machinery and equipment, used or to be used to provide electrical energy.

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EXHIBIT A SCHEDULE OF TAX ABATEMENT

A. AMOUNT OF VALUATION OF ELIGIBLE PROPERTY AS DETERMINED BY THE TAX APPRAISAL DISTRICT		B. AVERAGE NUMBER OF ADDITIONAL EMPLOYEES DURING THE TWELVE MONTHS PRIOR TO THE TAX ASSESSMENT DATE OF JANUARY 1		C. PERCENT OF TAX ABATED EACH YEAR DURING 10 - YEAR ABATEMENT PERIOD									
FROM	TO	FROM	TO	1	2	3	4	5	6	7	8	9	10
$100,000	$5,000,000	5	25	100	75	50	25	0	0	0	0	0	0
$5,000,001	$15,000,000	26	45	100	100	75	50	25	0	0	0	0	0
$15,000,01	Above	46	And Up	100	100	100	100	100	100	100	100	100	100
Special Downtown District													
Other	N/A	# Of Houses From	# Of Houses To										
Residential/Commercial	NA	5	And Up	100									

During the first year after the improvements are completed, and for each subsequent year during the term of an abatement granted pursuant to these Guidelines and Criteria, the percent of tax abated shall be based on either (1) the valuation of eligible property, as listed in Column A above, or (2) the average number of additional employees, as listed in Column B above, whichever results in the greater percentage abated as listed in Column C, or (3) in the case of Residential Commercial Property, 5 single-family dwellings, or more, constructed for immediate resale.

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 Eddie Bland
Print Name (Authorized School District Representative)

Superintendent
Title

sign here
Signature (Authorized School District Representative)

9/29/2020
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 Luke Dunnington
Print Name (Authorized Company Representative (Applicant))

Vice President
Title

sign here SEE ATTACHED SIGNATURE PAGE AND NOTARY BLOCK
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.

TAB 17

Signature and Certification Page; signed and dated by Authorized School District Representative and Authorized Company Representative (applicant)

See Attached

IP LUMINA, LLC,
a Delaware limited liability company

By: IP Pipeline Portfolio Holdco, LLC,
a Delaware limited liability company,
its sole member

By: IP Portfolio I, LLC,
a Delaware limited liability company,
its sole member

By: IP Renewable Energy Holdings LLC,
a Delaware limited liability company,
its sole member

By: _____
Name: Lucas Dunnington
Title: Vice President
Date: 9/5/2020

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California)
County of ~~San Francisco~~ ALAMEDA VG) ss.

On 5 SEPTEMBER, 2020 before me, VALERIE A. GURLEY, Notary Public, personally appeared Lucas Dunnington, who proved to me on the basis of satisfactory evidence to be the person whose name is subscribed to the within instrument and acknowledged to me that they executed the same in their authorized capacity, and that by their signature on the instrument the person, or entity upon behalf of which the person acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

Witness my hand and official seal.

Signature Valerie A. Gurley (Seal)

VALERIE A. GURLEY
Notary Public – California
Alameda County
Commission # 2222330
My Comm. Expires Nov 18, 2021