

**SUMMARY OF FINANCIAL IMPACT OF THE PROPOSED
FREEPORT LNG DEVELOPMENT, L.P. (PHASE 2) PROJECT ON
THE FINANCES OF THE BRAZOSPORT INDEPENDENT SCHOOL
DISTRICT UNDER A REQUESTED CHAPTER 313 PROPERTY
VALUE LIMITATION**

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Final Report

PREPARED BY



Estimated Impact of the Proposed Freeport LNG Development, L.P. (Phase 2) Project on the Finances of the Brazosport Independent School District under a Requested Chapter 313 Property Value Limitation

Introduction

Freeport LNG Development, L.P. (Freeport LNG) has requested that the Brazosport Independent School District (BISD) consider granting a property value limitation under Chapter 313 of the Tax Code, also known as the Texas Economic Development Act. In an application submitted to BISD on August 31, 2012, the second phase of the Freeport LNG project calls for an investment of \$1.8 billion to construct a new natural gas liquefaction project in BISD. The entire three-phase project is expected to result in a total investment of \$4.8 billion.

The Freeport LNG project is consistent with the state's goal to "encourage large scale capital investments in this state." When enacted as House Bill 1200 in 2001, Chapter 313 of the Tax Code granted eligibility to companies engaged in manufacturing, research and development, and renewable electric energy production to apply to school districts for property value limitations. Subsequent legislative changes expanded eligibility to clean coal projects, nuclear power generation and data centers, among others.

Under the provisions of Chapter 313, BISD may offer a minimum value limitation of \$30 million. The provisions of Chapter 313 call for the project to be fully taxable in the 2017-18 and 2018-19 school years, anticipating that the District and the Company will agree to an extension of the start of the two-year qualifying time period. For the purpose of this analysis, it is assumed that the qualifying time period will be the 2017-18 and 2018-19 school years. Beginning in the 2019-20 school year, the project would go on the local tax roll at \$30 million and remain at that level of taxable value for eight years for maintenance and operations (M&O) taxes.

The full taxable value of the project can be assessed for debt service taxes on voter-approved bond issues throughout the limitation period and after, with BISD currently levying a \$0.202 I&S tax rate. The full taxable value of the first phase of this investment is expected to reach \$1.8 billion in the 2018-19 school year, with depreciation expected to reduce the taxable value of the project over the course of the value limitation agreement.

In the case of the Freeport LNG project, the agreement calls for a calculation of the revenue impact of the value limitation in years 3-10 of the agreement, under whatever school finance and property tax laws are in effect in each of those years. BISD would experience a revenue loss as a result of the implementation of the value limitation in the 2019-20 school year (-\$13 million), with smaller additional revenue losses in subsequent years that result in a formula-loss total of -\$18.7 million for the eight value-limitation years.

Under the assumptions outlined below, the potential tax benefits under a Chapter 313 agreement could reach an estimated \$117.7 million over the course of the agreement. This amount is net of any anticipated revenue losses for the District.

School Finance Mechanics

Under the current school finance system, the property values established by the Comptroller's Office that are used to calculate state aid and recapture lag by one year, a practical consequence of the fact that the Comptroller's Office needs this time to conduct its property value study and now the planned audits of appraisal district operations in alternating years. A taxpayer receiving a value limitation pays M&O taxes on the reduced value for the project in years 3-10 and receives a tax bill for I&S taxes based on the full project value throughout the qualifying and value limitation period (and thereafter). The school funding formulas use the Comptroller's property values that reflect a reduction due to the property value limitation in years 4-11 as a result of the one-year lag in property values.

The third year is often problematical financially for a school district that approves a Chapter 313 value limitation. The implementation of the value limitation often results in a revenue loss to the school district in the third year of the agreement that would not be reimbursed by the state, but require some type of compensation from the applicant under the revenue protection provisions of the agreement. In years 4-10, smaller revenue losses would be anticipated when the state property values are aligned at the minimum value established by the Board on both the local tax roll and the corresponding state property value study.

Under the HB 1 system adopted in 2006, most school districts received additional state aid for tax reduction (ASATR) that was used to maintain their target revenue amounts established at the revenue levels under old law for the 2005-06 or 2006-07 school years, whichever was highest. In terms of new Chapter 313 property value limitation agreements, adjustments to ASATR funding often moderated the impact of the reduced M&O collections as a result of the limitation, in contrast with the earlier formula-driven finance system.

House Bill 3646 as enacted in 2009 created more "formula" school districts that were less dependent on ASATR state aid than had been the case previously. The formula reductions enacted under Senate Bill 1 (SB 1) as approved in the First Called Session in 2011 are designed to make \$4 billion in reductions to the existing school funding formulas for the 2011-12 and 2012-13 school years. For the 2011-12 school year, across-the-board reductions were made that reduced each district's WADA count and resulted in an estimated 815 school districts still receiving ASATR to maintain their target revenue funding levels, while an estimated 209 districts operating directly on the state formulas.

For the 2012-13 school year, the SB 1 changes called for smaller across-the-board reductions and funding ASATR-receiving target revenue districts at 92.35 percent of the level provided for under the existing funding formula. The result of these changes is that the number of ASATR districts is expected to be 421, with 603 formula districts.

For the 2013-14 school year and beyond, the ASATR reduction percentage will be set in the General Appropriations Act. The recent legislative session also saw the adoption of a statement of legislative intent to no longer fund target revenue (through ASATR) by the 2017-18 school year. It is likely that ASATR state funding will be reduced in future years and eliminated by the 2017-18 school year, based on current state policy.

One key element in any analysis of the school finance implications is the provision for revenue protection in the agreement between the school district and the applicant. In the case of the Freeport LNG project, the agreement calls for a calculation of the revenue impact of the value limitation in years 3-10 of the agreement, under whatever school finance and property tax laws are in effect in each of those years. This meets the statutory requirement under Section 313.027(f)(1) of the Tax Code to provide school district revenue protection language in the agreement.

Underlying Assumptions

There are several approaches that can be used to analyze the future revenue stream of a school district under a value limitation. Whatever method is used, a reasonable analysis requires the use of a multi-year forecasting model that covers the years in which the agreement is in effect. The Chapter 313 application now requires 15 years of data and analysis on the project being considered for a property value limitation.

The general approach used here is to maintain static enrollment and property values in order to isolate the effects of the value limitation under the school finance system. The current SB 1 reductions are reflected in the underlying models. With regard to ASATR funding the 92.35 percent reduction enacted for the 2012-13 school year and thereafter, until the 2017-18 school year. A statement of legislative intent adopted in 2011 to no longer fund target revenue by the 2017-18 school year, so that change is reflected in the estimates presented below, to the extent this provision has any impact on the estimates presented. The projected taxable values of the Freeport LNG project are factored into the base model used here, as are the effects of previously approved Chapter 313 value limitation agreements. The impact of the limitation value for the proposed Freeport LNG project (Phase 2) is isolated separately and the focus of this analysis.

Student enrollment counts are held constant at 11,570 students in average daily attendance (ADA) in analyzing the effects of the Freeport LNG project on the finances of BISD. The District's local tax base reached \$6.2 billion for the 2011 tax year and is maintained for the forecast period in order to isolate the effects of the property value limitation. An M&O tax rate of \$1.04 is used throughout this analysis. BISD has estimated state property wealth per weighted ADA or WADA of approximately \$483,406 for the 2016-17 school year. It is estimated that BISD will be subject to recapture at the current equalized wealth level for several years under the agreement, although the amount owed for the project is reduced as a result of the value limitation agreement. The enrollment and property value assumptions for the 15 years that are the subject of this analysis are summarized in Table 1.

School Finance Impact

School finance models were prepared for BISD under the assumptions outlined above through the 2031-32 school year. Beyond the 2012-13 school year, no attempt was made to forecast the 88th percentile or Austin yield that influence future state funding beyond the projected level for that school year. In the analyses for other districts and applicants on earlier projects, these changes appeared to have little impact on the revenue associated with the implementation of the property value limitation, since the baseline and other models incorporate the same underlying assumptions.

Under the proposed agreement, a model is established to make a calculation of the "Baseline Revenue" by adding the value of the proposed Freeport LNG facility to the model, but without assuming that a value limitation is approved. The results of the model are shown in Table 2.

A second model is developed which adds the Freeport LNG value but imposes the proposed property value limitation effective in the third year, which in this case is the 2018-19 school year. The results of this model are identified as “Value Limitation Revenue Model” under the revenue protection provisions of the proposed agreement (see Table 3).

A summary of the differences between these models is shown in Table 4. Under these assumptions, BISD would experience a revenue loss as a result of the implementation of the value limitation in the 2018-19 school year (-\$13.0 million). The revenue reduction results from the mechanics of the up to six cents beyond the compressed M&O tax rate equalized to the Austin yield or not subject to recapture, which reflect the one-year lag in value associated with the state property value study. Smaller revenue losses are expected in several subsequent school years under the value limitation.

As noted previously, no attempt was made to forecast further reductions in ASATR funding beyond the 92.35 percent adjustment adopted for the 2012-13 school year, although it is assumed that ASATR will be eliminated beginning in the 2017-18 school year, based on the 2011 statement of legislative intent. ASATR funding does not appear to have an impact on the estimates presented here.

Future school funding formula changes could have a potential impact on these estimates. For example, when the \$30 million value limitation takes effect in the 2019-20 school year, Freeport LNG would be expected to see initial tax savings of \$18.1 million. Recapture costs would be expected to be reduced by about \$5.1 million, but there are few other offsets, resulting in the hold-harmless loss amount of \$14.6 million. In the 2020-21 school year, state formula changes reflecting the lower state property value reduce recapture by \$12.9 million, offsetting much of the \$17.5 million in tax savings anticipated for the Company.

The Comptroller’s state property value study influences these calculations, as noted previously. At the school-district level, a taxpayer benefiting from a property value limitation has two property values assigned by the local appraisal district for their property covered by the limitation: (1) a reduced value for M&O taxes, and (2) the full taxable value for I&S taxes. This situation exists for the eight years that the value limitation is in effect. The Comptroller’s Property Tax Assistance Division makes two value determinations for school districts granting Chapter 313 agreements, consistent with local practice.

Impact on the Taxpayer

Table 5 summarizes the impact of the proposed property value limitation in terms of the potential tax savings under the property value limitation agreement. The focus of this table is on the M&O tax rate only. As noted previously, the property is fully taxable prior to the start of the eight-year value limitation period. A \$1.04 per \$100 of taxable value M&O rate is assumed in 2012-13 and thereafter.

Under the assumptions used here, the potential gross tax savings from the value limitation total \$124.9 million over the life of the agreement. In addition, Freeport LNG would be eligible for a tax credit for M&O taxes paid on value in excess of the value limitation in each of the two qualifying years. The credit amount is paid out slowly through years 4-10 due to statutory limits on the scale of these payments over these seven years, with catch-up payments permitted in years 11-13. The tax credits are expected to total approximately \$11.5 million over the life of the

agreement, with no unpaid tax credits anticipated. The school district is to be reimbursed by the Texas Education Agency for the cost of these credits.

The key BISD revenue losses are expected to total approximately -\$18.7 million over the course of the agreement. In total, the potential net tax benefits (inclusive of tax credits but after hold-harmless payments are made) are estimated to total \$117.7 million. While future legislative changes could affect the level of hold-harmless payments, the state property value study reflecting the reduced value reflected in the limitation agreement is expected to continue to offset most local revenue losses after the initial \$30 million limitation year.

Facilities Funding Impact

The Freeport LNG project remains fully taxable for debt services taxes, with BISD currently levying a \$0.202 I&S rate. The value of the Freeport LNG project is expected to depreciate over the life of the agreement and beyond, but full access to the additional value is expected to assist BISD in meeting its I&S tax obligations.

The Freeport LNG project is not expected to affect BISD in terms of enrollment. Continued expansion of the project through its three phases and related development could result in additional employment in the area and an increase in the school-age population, but a variety of housing options exist in the Brazosport ISD area so it is difficult to determine if the workforce expected at the Freeport LNG site will have much impact on BISD's enrollment.

Conclusion

The proposed Freeport LNG natural gas liquefaction project enhances the tax base of BISD. It reflects continued capital investment in keeping with the goals of Chapter 313 of the Tax Code.

Under the assumptions outlined above, the potential tax savings for the applicant under a Chapter 313 agreement could reach an estimated \$117.7 million. (This amount is net of any anticipated revenue losses for the District.) The additional taxable value also enhances the tax base of BISD in meeting its future debt service obligations.

Table 1 – Base District Information with Freeport LNG Development, L.P. Project Value and Limitation Values

Year of Agreement	School Year	ADA	WADA	M&O Tax Rate	I&S Tax Rate	CAD Value with Project	CAD Value with Limitation	CPTD with Project	CPTD With Limitation	CPTD Value with Project per WADA	CPTD Value with Limitation per WADA
Pre-Year 1	2016-17	11,569.85	15,136.61	\$1.0400	\$0.2015	\$7,560,832,578	\$7,560,832,578	\$7,317,121,503	\$7,317,121,503	\$483,406	\$483,406
1	2017-18	11,569.85	15,136.61	\$1.0400	\$0.2015	\$7,999,215,020	\$7,999,215,020	\$7,650,832,578	\$7,650,832,578	\$505,452	\$505,452
2	2018-19	11,569.85	15,136.61	\$1.0400	\$0.2015	\$10,217,383,605	\$10,217,383,605	\$8,089,215,020	\$8,089,215,020	\$534,414	\$534,414
3	2019-20	11,569.85	15,136.61	\$1.0400	\$0.2015	\$11,181,679,975	\$9,440,371,975	\$10,307,383,605	\$10,307,383,605	\$680,957	\$680,957
4	2020-21	11,569.85	15,136.61	\$1.0400	\$0.2015	\$8,480,880,699	\$6,801,568,479	\$11,271,679,975	\$9,530,371,975	\$744,664	\$629,624
5	2021-22	11,569.85	15,136.61	\$1.0400	\$0.2015	\$8,421,259,231	\$6,801,772,988	\$8,570,880,699	\$6,891,568,479	\$566,235	\$455,292
6	2022-23	11,569.85	15,136.61	\$1.0400	\$0.2015	\$8,363,839,636	\$6,802,085,410	\$8,511,259,231	\$6,891,772,988	\$562,296	\$455,305
7	2023-24	11,569.85	15,136.61	\$1.0400	\$0.2015	\$8,437,782,617	\$6,971,262,637	\$8,453,839,636	\$6,892,085,410	\$558,503	\$455,326
8	2024-25	11,569.85	15,136.61	\$1.0400	\$0.2015	\$8,800,902,076	\$7,412,023,237	\$8,527,782,617	\$7,061,262,637	\$563,388	\$466,502
9	2025-26	11,569.85	15,136.61	\$1.0400	\$0.2015	\$8,699,276,811	\$7,384,008,046	\$8,890,902,076	\$7,502,023,237	\$587,378	\$495,621
10	2026-27	11,569.85	15,136.61	\$1.0400	\$0.2015	\$9,140,485,386	\$7,905,689,270	\$8,789,276,811	\$7,474,008,046	\$580,664	\$493,770
11	2027-28	11,569.85	15,136.61	\$1.0400	\$0.2015	\$9,016,115,680	\$9,016,115,680	\$9,230,485,386	\$7,995,689,270	\$609,812	\$528,235
12	2028-29	11,569.85	15,136.61	\$1.0400	\$0.2015	\$10,716,688,382	\$10,716,688,382	\$9,106,115,680	\$9,106,115,680	\$601,596	\$601,596
13	2029-30	11,569.85	15,136.61	\$1.0400	\$0.2015	\$10,531,257,848	\$10,531,257,848	\$10,806,688,382	\$10,806,688,382	\$713,944	\$713,944
14	2030-31	11,569.85	15,136.61	\$1.0400	\$0.2015	\$10,354,706,024	\$10,354,706,024	\$10,621,257,848	\$10,621,257,848	\$701,694	\$701,694
15	2031-32	11,569.85	15,136.61	\$1.0400	\$0.2015	\$10,186,611,727	\$10,186,611,727	\$10,444,706,024	\$10,444,706,024	\$690,030	\$690,030

*Tier II Yield: \$47.65; AISD Yield: \$59.97; Equalized Wealth: \$476,500 per WADA

Table 2– “Baseline Revenue Model”--Project Value Added with No Value Limitation

Year of Agreement	School Year	M&O Taxes @ Compressed Rate	State Aid	Additional State Aid-Hold Harmless	Excess Formula Reduction	Recapture Costs	Additional Local M&O Collections	State Aid From Additional M&O Tax Collections	Recapture from the Additional Local Tax Effort	Total General Fund
Pre-Year 1	2016-17	\$66,890,227	\$4,946,125	\$639,549	\$0	-\$907,784	\$9,686,565	\$1,062,825	-\$1,697,099	\$80,620,408
1	2017-18	\$70,793,043	\$4,136,235	\$0	\$0	-\$3,852,277	\$10,251,743	\$871,833	-\$1,948,831	\$80,251,746
2	2018-19	\$90,540,877	\$4,946,125	\$0	\$0	-\$9,321,258	\$13,111,483	\$730,531	-\$2,724,544	\$97,283,215
3	2019-20	\$99,442,158	\$4,136,235	\$0	\$0	-\$28,364,625	\$14,400,503	\$0	-\$3,949,753	\$85,664,519
4	2020-21	\$75,386,312	\$4,946,125	\$0	\$0	-\$25,790,268	\$10,916,908	\$0	-\$3,220,703	\$62,238,374
5	2021-22	\$74,844,646	\$4,136,235	\$0	\$0	-\$11,268,103	\$10,838,467	\$292,148	-\$2,440,379	\$76,403,015
6	2022-23	\$74,322,964	\$4,946,125	\$0	\$0	-\$10,773,344	\$10,762,921	\$326,530	-\$2,401,387	\$77,183,810
7	2023-24	\$74,963,958	\$4,136,235	\$0	\$0	-\$10,456,356	\$10,855,745	\$365,212	-\$2,400,449	\$77,464,345
8	2024-25	\$78,182,619	\$4,946,125	\$0	\$0	-\$11,454,766	\$11,321,849	\$332,816	-\$2,532,534	\$80,796,109
9	2025-26	\$77,264,499	\$4,946,125	\$0	\$0	-\$13,855,744	\$11,188,893	\$107,056	-\$2,636,703	\$77,014,127
10	2026-27	\$81,177,854	\$4,946,125	\$0	\$0	-\$13,834,159	\$11,755,597	\$175,772	-\$2,732,045	\$81,489,143
11	2027-28	\$79,846,271	\$4,946,125	\$0	\$0	-\$16,582,569	\$11,562,767	\$0	-\$2,844,369	\$76,928,225
12	2028-29	\$94,986,070	\$4,946,125	\$0	\$0	-\$18,763,808	\$13,755,205	\$0	-\$3,332,835	\$91,590,757
13	2029-30	\$93,335,226	\$4,946,125	\$0	\$0	-\$29,527,833	\$13,516,141	\$0	-\$3,858,593	\$78,411,066
14	2030-31	\$91,763,426	\$4,946,125	\$0	\$0	-\$27,977,032	\$13,288,524	\$0	-\$3,739,966	\$78,281,078
15	2031-32	\$90,266,922	\$4,946,125	\$0	\$0	-\$26,536,438	\$13,071,811	\$0	-\$3,626,987	\$78,121,434

Table 3--“Value Limitation Revenue Model”--Project Value Added with Value Limit

Year of Agreement	School Year	M&O Taxes @ Compressed Rate	State Aid	Additional State Aid-Hold Harmless	Excess Formula Reduction	Recapture Costs	Additional Local M&O Collections	State Aid From Additional M&O Tax Collections	Recapture from the Additional Local Tax Effort	Total General Fund
Pre-Year 1	2016-17	\$66,890,227	\$4,946,125	\$639,549	\$0	-\$907,784	\$9,686,565	\$1,062,825	-\$1,697,099	\$80,620,408
1	2017-18	\$70,793,043	\$4,136,235	\$0	\$0	-\$3,852,277	\$10,251,743	\$871,833	-\$1,948,831	\$80,251,746
2	2018-19	\$90,540,877	\$4,946,125	\$0	\$0	-\$9,321,258	\$13,111,483	\$730,531	-\$2,724,544	\$97,283,215
3	2019-20	\$83,623,325	\$4,136,235	\$0	\$0	-\$23,852,502	\$12,109,733	\$0	-\$3,321,443	\$72,695,348
4	2020-21	\$60,130,677	\$4,946,125	\$0	\$0	-\$13,892,550	\$8,707,695	\$0	-\$2,216,218	\$57,675,730
5	2021-22	\$60,132,498	\$7,789,297	\$0	\$0	\$0	\$8,707,959	\$1,259,693	-\$1,342,006	\$76,547,441
6	2022-23	\$60,135,279	\$7,787,439	\$0	\$0	\$0	\$8,708,362	\$1,259,596	-\$1,342,162	\$76,548,514
7	2023-24	\$61,641,424	\$7,784,601	\$0	\$0	\$0	\$8,926,471	\$1,290,901	-\$1,375,925	\$78,267,473
8	2024-25	\$65,565,413	\$6,247,718	\$0	\$0	\$0	\$9,494,715	\$1,236,431	-\$1,545,993	\$80,998,284
9	2025-26	\$65,316,000	\$4,946,125	\$0	\$0	-\$2,393,919	\$9,458,597	\$905,908	-\$1,736,775	\$76,495,936
10	2026-27	\$69,960,405	\$4,946,125	\$0	\$0	-\$2,324,629	\$10,131,166	\$991,281	-\$1,847,622	\$81,856,727
11	2027-28	\$79,846,271	\$4,946,125	\$0	\$0	-\$7,429,127	\$11,562,767	\$713,463	-\$2,360,942	\$87,278,557
12	2028-29	\$94,986,070	\$4,946,125	\$0	\$0	-\$18,763,808	\$13,755,205	\$0	-\$3,332,835	\$91,590,757
13	2029-30	\$93,335,226	\$4,946,125	\$0	\$0	-\$29,527,833	\$13,516,141	\$0	-\$3,858,593	\$78,411,066
14	2030-31	\$91,763,426	\$4,946,125	\$0	\$0	-\$27,977,032	\$13,288,524	\$0	-\$3,739,966	\$78,281,078
15	2031-32	\$90,266,922	\$4,946,125	\$0	\$0	-\$26,536,438	\$13,071,811	\$0	-\$3,626,987	\$78,121,434

Table 4 – Value Limit less Project Value with No Limit

Year of Agreement	School Year	M&O Taxes @ Compressed Rate	State Aid	Additional State Aid-Hold Harmless	Excess Formula Reduction	Recapture Costs	Additional Local M&O Collections	State Aid From Additional M&O Tax Collections	Recapture from the Additional Local Tax Effort	Total General Fund
Pre-Year 1	2016-17	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
1	2017-18	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2	2018-19	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
3	2019-20	-\$15,818,834	\$0	\$0	\$0	\$4,512,123	-\$2,290,771	\$0	\$628,310	-\$12,969,171
4	2020-21	-\$15,255,635	\$0	\$0	\$0	\$11,897,719	-\$2,209,212	\$0	\$1,004,485	-\$4,562,643
5	2021-22	-\$14,712,148	\$3,653,062	\$0	\$0	\$11,268,103	-\$2,130,508	\$967,545	\$1,098,373	\$144,426
6	2022-23	-\$14,187,685	\$2,841,314	\$0	\$0	\$10,773,344	-\$2,054,559	\$933,066	\$1,059,225	-\$635,295
7	2023-24	-\$13,322,533	\$3,648,366	\$0	\$0	\$10,456,356	-\$1,929,274	\$925,689	\$1,024,525	\$803,128
8	2024-25	-\$12,617,206	\$1,301,593	\$0	\$0	\$11,454,766	-\$1,827,134	\$903,614	\$986,541	\$202,175
9	2025-26	-\$11,948,499	\$0	\$0	\$0	\$11,461,825	-\$1,730,296	\$798,852	\$899,927	-\$518,191
10	2026-27	-\$11,217,448	\$0	\$0	\$0	\$11,509,530	-\$1,624,431	\$815,510	\$884,423	\$367,583
11	2027-28	\$0	\$0	\$0	\$0	\$9,153,442	\$0	\$713,463	\$483,427	\$10,350,332
12	2028-29	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
13	2029-30	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
14	2030-31	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
15	2031-32	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0

Table 5 - Estimated Financial impact of the Freeport LNG Development, L.P. Project Property Value Limitation Request Submitted to BISD at \$1.04 M&O Tax Rate

Year of Agreement	School Year	Project Value	Estimated Taxable Value	Value Savings	Taxes Before Value Limit	Taxes after Value Limit	Tax Savings @ Projected M&O Rate	Tax Credits for First Two Years Above Limit	Tax Benefit to Company Before Revenue Protection	School District Revenue Losses	Estimated Net Tax Benefits
Pre-Year 1	2016-17	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
1	2017-18	\$472,149,901	\$472,149,901	\$0	\$4,910,359	\$4,910,359	\$0	\$0	\$0	\$0	\$0
2	2018-19	\$695,800,000	\$695,800,000	\$0	\$7,236,320	\$7,236,320	\$0	\$0	\$0	\$0	\$0
3	2019-20	\$1,771,308,000	\$30,000,000	\$1,741,308,000	\$18,421,603	\$312,000	\$18,109,603	\$0	\$18,109,603	-\$12,969,171	\$5,140,432
4	2020-21	\$1,709,312,220	\$30,000,000	\$1,679,312,220	\$17,776,847	\$312,000	\$17,464,847	\$1,646,097	\$19,110,944	-\$4,562,643	\$14,548,301
5	2021-22	\$1,649,486,243	\$30,000,000	\$1,619,486,243	\$17,154,657	\$312,000	\$16,842,657	\$1,646,097	\$18,488,754	\$0	\$18,488,754
6	2022-23	\$1,591,754,226	\$30,000,000	\$1,561,754,226	\$16,554,244	\$312,000	\$16,242,244	\$1,646,097	\$17,888,341	-\$635,295	\$17,253,046
7	2023-24	\$1,496,519,980	\$30,000,000	\$1,466,519,980	\$15,563,808	\$312,000	\$15,251,808	\$1,646,097	\$16,897,905	\$0	\$16,897,905
8	2024-25	\$1,418,878,839	\$30,000,000	\$1,388,878,839	\$14,756,340	\$312,000	\$14,444,340	\$1,585,520	\$16,029,860	\$0	\$16,029,860
9	2025-26	\$1,345,268,765	\$30,000,000	\$1,315,268,765	\$13,990,795	\$312,000	\$13,678,795	\$1,511,358	\$15,190,153	-\$518,191	\$14,671,962
10	2026-27	\$1,264,796,116	\$30,000,000	\$1,234,796,116	\$13,153,880	\$312,000	\$12,841,880	\$1,430,282	\$14,272,162	\$0	\$14,272,162
11	2027-28	\$1,189,143,372	\$1,189,143,372	\$0	\$12,367,091	\$12,367,091	\$0	\$411,130	\$411,130	\$0	\$411,130
12	2028-29	\$1,118,021,579	\$1,118,021,579	\$0	\$11,627,424	\$11,627,424	\$0	\$0	\$0	\$0	\$0
13	2029-30	\$1,051,159,175	\$1,051,159,175	\$0	\$10,932,055	\$10,932,055	\$0	\$0	\$0	\$0	\$0
14	2030-31	\$988,300,802	\$988,300,802	\$0	\$10,278,328	\$10,278,328	\$0	\$0	\$0	\$0	\$0
15	2031-32	\$929,206,607	\$929,206,607	\$0	\$9,663,749	\$9,663,749	\$0	\$0	\$0	\$0	\$0
Totals					\$194,387,501	\$69,511,327	\$124,876,174	\$11,522,679	\$136,398,853	-\$18,685,301	\$117,713,552
Tax Credit for Value Over Limit in First 2 Years								Year 1	Year 2	Max Credits	
								\$4,598,359	\$6,924,320	\$11,522,679	
								Credits Earned		\$11,522,679	
								Credits Paid		<u>\$11,522,679</u>	
								Excess Credits Unpaid		\$0	

***Note:** School District Revenue-Loss estimates are subject to change based on numerous factors, including legislative and Texas Education Agency administrative changes to school finance formulas, year-to-year appraisals of project values, and changes in school district tax rates. One of the most substantial changes to the school finance formulas related to Chapter 313 revenue-loss projections could be the treatment of Additional State Aid for Tax Reduction (ASATR). Legislative intent is to end ASATR in 2017-18 school year. Additional information on the assumptions used in preparing these estimates is provided in the narrative of this Report.