

S U S A N

C O M B S

TEXAS COMPTROLLER *of* PUBLIC ACCOUNTS

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



May 14, 2013

Dr. Rodney Cavness
Superintendent
Port Neches-Groves Independent School District
620 Avenue C
Port Neches, Texas 77651

Dear Superintendent Cavness:

On February 20, 2013, the Comptroller received the completed application (Application # 267) for a limitation on appraised value under the provisions of Tax Code Chapter 313¹. This application was originally submitted in October 2012 to the Port Neches-Groves Independent School District (the school district) by Huntsman Petrochemical, LLC (the applicant). This letter presents the results of the Comptroller's review of the application:

- 1) under Section 313.025(h) to determine if the property meets the requirements of Section 313.024 for eligibility for a limitation on appraised value under Chapter 313, Subchapter C; and
- 2) under Section 313.025(d), to make a recommendation to the governing body of the school district as to whether the application should be approved or disapproved using the criteria set out by Section 313.026.

The school district is currently classified as a rural school district in Category 1 according to the provisions of Chapter 313. Therefore, the applicant properly applied under the provisions of Subchapter C, applicable to rural school districts. The amount of proposed qualified investment (\$110 million) is consistent with the proposed appraised value limitation sought (\$30 million). The property value limitation amount noted in this recommendation is based on property values available at the time of application and may change prior to the execution of any final agreement.

The applicant is an active franchise taxpayer in good standing, as required by Section 313.024(a), and is proposing the construction of a manufacturing facility in Jefferson County, an eligible property use under Section 313.024(b). The Comptroller has determined that the property, as described in the application, meets the requirements of Section 313.024 for eligibility for a limitation on appraised value under Chapter 313, Subchapter C.

After reviewing the application using the criteria listed in Section 313.026, and the information provided by the applicant, the Comptroller's recommendation is that this application under Tax Code Chapter 313 be approved.

Our review of the application assumes the truth and accuracy of the statements in the application and that, if the application is approved, the applicant would perform according to the provisions of the agreement reached with the school district. Our recommendation does not address whether the applicant has complied with all Chapter 313 requirements; the school district is responsible for verifying that all requirements of the statute have been fulfilled. Additionally, Section 313.025 requires the school district to only approve an application if the school district finds that the information in the application is true and

¹ All statutory references are to the Texas Tax Code, unless otherwise noted.

correct, finds that the applicant is eligible for a limitation and determines that granting the application is in the best interest of the school district and this state. As stated above, the Comptroller's recommendation is prepared by generally reviewing the application and supporting documentation in light of the Section 313.026 criteria.

Note that any new building or other improvement existing as of the application review start date of February 20, 2013, or any tangible personal property placed in service prior to that date may not become "Qualified Property" as defined by 313.021(2).

The Comptroller's recommendation is based on the application submitted by the school district and reviewed by the Comptroller. The recommendation may not be used by the school district to support its approval of the property value limitation agreement if the application is modified, the information presented in the application changes, or the limitation agreement does not conform to the application. Additionally, this recommendation is contingent on future compliance with the Chapter 313 and the Texas Administrative Code, with particular reference to the following requirements related to the execution of the agreement:

- 1) The applicant must provide the Comptroller a copy of the proposed limitation on appraised value agreement no later than ten (10) days prior to the meeting scheduled by the school district to consider approving the agreement, so that the Comptroller may review it for compliance with the statutes and the Comptroller's rules as well as consistency with the application;
- 2) The Comptroller must confirm that it received and reviewed the draft agreement and affirm the recommendation made in this letter;
- 3) The school district must approve and execute a limitation agreement that has been reviewed by the Comptroller within a year from the date of this letter; and
- 4) The school district must provide a copy of the signed limitation agreement to the Comptroller within seven (7) days after execution, as required by Section 313.025.

Should you have any questions, please contact Robert Wood, director of Economic Development & Analysis Division, by email at robert.wood@cpa.state.tx.us or by phone at 1-800-531-5441, ext. 3-3973, or direct in Austin at 512-463-3973.

Sincerely,



Martin A. Hubert
Deputy Comptroller

Enclosure

cc: Robert Wood

Economic Impact for Chapter 313 Project

Applicant	Huntsman Petrochemical, LLC
Tax Code, 313.024 Eligibility Category	Manufacturing
School District	Port Neches-Groves
2011-2012 Enrollment in School District	4,711
County	Jefferson
Total Investment in District	\$125,000,000
Qualified Investment	\$110,000,000
Limitation Amount	\$30,000,000
Number of total jobs committed to by applicant	10
Number of qualifying jobs committed to by applicant	10
Average Weekly Wage of Qualifying Jobs committed to by applicant	\$1,250
Minimum Weekly Wage Required Tax Code, 313.051(b)	\$1,242
Minimum Annual Wage committed to by applicant for qualified jobs	\$65,000
Investment per Qualifying Job	\$12,500,000
Estimated 15 year M&O levy without any limit or credit:	\$12,654,891
Estimated gross 15 year M&O tax benefit	\$6,150,300
Estimated 15 year M&O tax benefit (<i>after</i> deductions for estimated school district revenue protection--but not including any deduction for supplemental payments or extraordinary educational expenses):	\$5,393,580
Tax Credits (estimated - part of total tax benefit in the two lines above - appropriated through Foundation School Program)	\$1,199,250
Net M&O Tax (15 years) After Limitation, Credits and Revenue Protection:	\$7,261,311
Tax benefit as a percentage of what applicant would have paid without value limitation agreement (percentage exempted)	42.6%
Percentage of tax benefit due to the limitation	80.5%
Percentage of tax benefit due to the credit.	19.5%

This presents the Comptroller's economic impact evaluation of Huntsman Petrochemical, LLC (the project) applying to Port Neches-Groves Independent School District (the district), as required by Tax Code, 313.026. This evaluation is based on information provided by the applicant and examines the following criteria:

- (1) the recommendations of the comptroller;
- (2) the name of the school district;
- (3) the name of the applicant;
- (4) the general nature of the applicant's investment;
- (5) the relationship between the applicant's industry and the types of qualifying jobs to be created by the applicant to the long-term economic growth plans of this state as described in the strategic plan for economic development submitted by the Texas Strategic Economic Development Planning Commission under Section 481.033, Government Code, as that section existed before February 1, 1999;
- (6) the relative level of the applicant's investment per qualifying job to be created by the applicant;
- (7) the number of qualifying jobs to be created by the applicant;
- (8) the wages, salaries, and benefits to be offered by the applicant to qualifying job holders;
- (9) the ability of the applicant to locate or relocate in another state or another region of this state;
- (10) the impact the project will have on this state and individual local units of government, including:
 - (A) tax and other revenue gains, direct or indirect, that would be realized during the qualifying time period, the limitation period, and a period of time after the limitation period considered appropriate by the comptroller; and
 - (B) economic effects of the project, including the impact on jobs and income, during the qualifying time period, the limitation period, and a period of time after the limitation period considered appropriate by the comptroller;
- (11) the economic condition of the region of the state at the time the person's application is being considered;
- (12) the number of new facilities built or expanded in the region during the two years preceding the date of the application that were eligible to apply for a limitation on appraised value under this subchapter;
- (13) the effect of the applicant's proposal, if approved, on the number or size of the school district's instructional facilities, as defined by Section 46.001, Education Code;
- (14) the projected market value of the qualified property of the applicant as determined by the comptroller;
- (15) the proposed limitation on appraised value for the qualified property of the applicant;
- (16) the projected dollar amount of the taxes that would be imposed on the qualified property, for each year of the agreement, if the property does not receive a limitation on appraised value with assumptions of the projected appreciation or depreciation of the investment and projected tax rates clearly stated;
- (17) the projected dollar amount of the taxes that would be imposed on the qualified property, for each tax year of the agreement, if the property receives a limitation on appraised value with assumptions of the projected appreciation or depreciation of the investment clearly stated;
- (18) the projected effect on the Foundation School Program of payments to the district for each year of the agreement;
- (19) the projected future tax credits if the applicant also applies for school tax credits under Section 313.103; and
- (20) the total amount of taxes projected to be lost or gained by the district over the life of the agreement computed by subtracting the projected taxes stated in Subdivision (17) from the projected taxes stated in Subdivision (16).

Wages, salaries and benefits [313.026(6-8)]

After construction, the project will create ten new jobs when fully operational. All ten jobs will meet the criteria for qualifying jobs as specified in Tax Code Section 313.021(3). According to the Texas Workforce Commission (TWC), the regional manufacturing wage for the South East Texas Regional Planning Commission Region, where Jefferson County is located was \$58,724 in 2011. The annual average manufacturing wage for 2011-2012 for Jefferson County is \$88,348. That same year, the county annual average wage for all industries was \$50,011. In addition to a salary of \$65,000, each qualifying position will receive benefits such medical, dental, vision, 401(k) retirement, life insurance and paid vacation days. The project's total investment is \$125 million, resulting in a relative level of investment per qualifying job of \$12.5 million.

Ability of applicant to locate to another state and [313.026(9)]

According to Huntsman Petrochemical, LLC's application, "Huntsman has petrochemical operations in several states within the United States and many other sites in other countries around globe. Port Neches is the primary location for the production of Ethylene Oxide and Ethylene Glycol. However, the equipment could operate as a stand-alone plant and Huntsman could install the reactor system at other petrochemical sites, several of which use EO as a raw material to make other products. The closest neighboring state in which Huntsman operates EO derivative plants is Louisiana."

Number of new facilities in region [313.026(12)]

During the past two years, three projects in the South East Texas Regional Planning Commission Region applied for value limitation agreements under Tax Code, Chapter 313.

Relationship of applicant's industry and jobs and Texas's economic growth plans [313.026(5)]

The Texas Economic Development Plan focuses on attracting and developing industries using technology. It also identifies opportunities for existing Texas industries. The plan centers on promoting economic prosperity throughout Texas and the skilled workers that the Huntsman Petrochemical, LLC project requires appear to be in line with the focus and themes of the plan. Texas identified manufacturing as one of six target clusters in the Texas Cluster Initiative. The plan stresses the importance of technology in all sectors of the manufacturing industry.

Economic Impact [313.026(10)(A), (10)(B), (11), (13-20)]

Table 1 depicts Huntsman Petrochemical, LLC's estimated economic impact to Texas. It depicts the direct, indirect and induced effects to employment and personal income within the state. The Comptroller's office calculated the economic impact based on 16 years of annual investment and employment levels using software from Regional Economic Models, Inc. (REMI). The impact includes the construction period and the operating period of the project.

Table 1: Estimated Statewide Economic Impact of Investment and Employment in Huntsman Petrochemical, LLC

Year	Employment			Personal Income		
	Direct	Indirect + Induced	Total	Direct	Indirect + Induced	Total
2013	192	212	404	\$10,000,000	\$14,000,000	\$24,000,000
2014	173	220	393	\$9,150,000	\$15,850,000	\$25,000,000
2015	10	51	61	\$650,000	\$6,350,000	\$7,000,000
2016	10	31	41	\$650,000	\$4,350,000	\$5,000,000
2017	10	26	36	\$650,000	\$4,350,000	\$5,000,000
2018	10	23	33	\$650,000	\$3,350,000	\$4,000,000
2019	10	21	31	\$650,000	\$3,350,000	\$4,000,000
2020	10	27	37	\$650,000	\$3,350,000	\$4,000,000
2021	10	29	39	\$650,000	\$4,350,000	\$5,000,000
2022	10	31	41	\$650,000	\$4,350,000	\$5,000,000
2023	10	39	49	\$650,000	\$4,350,000	\$5,000,000
2024	10	35	45	\$650,000	\$4,350,000	\$5,000,000
2025	10	41	51	\$650,000	\$4,350,000	\$5,000,000
2026	10	37	47	\$650,000	\$5,350,000	\$6,000,000
2027	10	41	51	\$650,000	\$5,350,000	\$6,000,000
2028	10	41	51	\$650,000	\$6,350,000	\$7,000,000

Source: CPA, REMI, Huntsman Petrochemical, LLC

The statewide average ad valorem tax base for school districts in Texas was \$1.74 billion in 2011-2012. Port Neches-Groves ISD's ad valorem tax base in 2011-2012 was \$2.525 billion. The statewide average wealth per WADA was estimated at \$347,943 for fiscal 2011-2012. During that same year, Port Neches-Groves ISD's estimated wealth per WADA was \$470,105. The impact on the facilities and finances of the district are presented in Attachment 2.

Table 2 examines the estimated direct impact on ad valorem taxes to the school district, Jefferson County, Sabine-Neches Navigation District and Jefferson County Drainage District # 7 with all property tax incentives sought being granted using estimated market value from Huntsman Petrochemical, LLC's application. Huntsman Petrochemical, LLC has applied for both a value limitation under Chapter 313, Tax Code and tax abatements with the county and the navigation district. Table 3 illustrates the estimated tax impact of the Huntsman Petrochemical, LLC project on the region if all taxes are assessed.

Table 2 Estimated Direct Ad Valorem Taxes with all property tax incentives sought

Year	Estimated Taxable Value for I&S	Estimated Taxable Value for M&O	Tax Rate ¹	Port Neches-Groves ISD I&S Levy	Port Neches-Groves ISD M&O Levy	Port Neches-Groves ISD M&O and I&S Tax Levies (Before Credit Credited)	Port Neches-Groves ISD M&O and I&S Tax Levies (After Credit Credited)	Jefferson County Tax Levy	Sabine-Neches Navigation District Tax Levy	Jefferson County Drainage District #7 Tax Levy	Estimated Total Property Taxes
			0.3481	0.3481	1.0400			0.3650	0.0279	0.1409	
2014	\$62,500,000	\$62,500,000		\$217,544	\$650,000	\$867,544	\$867,544	\$0	\$0	\$88,093	\$955,637
2015	\$112,812,500	\$112,812,500		\$392,666	\$1,173,250	\$1,565,916	\$1,565,916	\$0	\$0	\$159,008	\$1,724,925
2016	\$106,875,000	\$30,000,000		\$372,000	\$312,000	\$684,000	\$684,000	\$39,009	\$2,979	\$150,639	\$876,627
2017	\$100,937,500	\$30,000,000		\$351,333	\$312,000	\$663,333	\$492,012	\$36,842	\$2,813	\$142,270	\$673,937
2018	\$95,000,000	\$30,000,000		\$330,667	\$312,000	\$642,667	\$471,345	\$34,675	\$2,648	\$133,902	\$642,569
2019	\$92,625,000	\$30,000,000		\$322,400	\$312,000	\$634,400	\$463,078	\$106,496	\$8,132	\$130,554	\$708,260
2020	\$89,062,500	\$30,000,000		\$310,000	\$312,000	\$622,000	\$450,678	\$325,078	\$24,822	\$125,533	\$926,111
2021	\$83,125,000	\$30,000,000		\$289,333	\$312,000	\$601,333	\$430,012	\$303,406	\$23,167	\$117,164	\$873,749
2022	\$77,187,500	\$30,000,000		\$268,667	\$312,000	\$580,667	\$409,345	\$281,734	\$21,512	\$108,795	\$821,387
2023	\$71,250,000	\$30,000,000		\$248,000	\$312,000	\$560,000	\$388,678	\$260,063	\$19,857	\$100,426	\$769,024
2024	\$69,112,500	\$69,112,500		\$240,560	\$718,770	\$959,330	\$959,330	\$252,261	\$19,262	\$97,413	\$1,328,266
2025	\$67,039,125	\$67,039,125		\$233,343	\$697,207	\$930,550	\$930,550	\$244,693	\$18,684	\$94,491	\$1,288,418
2026	\$65,027,951	\$65,027,951		\$226,343	\$676,291	\$902,633	\$902,633	\$237,352	\$18,123	\$91,656	\$1,249,765
2027	\$63,077,113	\$63,077,113		\$219,553	\$656,002	\$875,554	\$875,554	\$230,231	\$17,580	\$88,907	\$1,212,272
2028	\$61,184,799	\$61,184,799		\$212,966	\$636,322	\$849,288	\$849,288	\$223,325	\$17,052	\$86,239	\$1,175,904
						Total	\$10,739,965	\$2,575,165	\$196,630	\$1,715,091	\$15,226,850

Assumes School Value Limitation and Tax Abatements with the County and Navigation District.

Source: CPA, Huntsman Petrochemical, LLC

¹Tax Rate per \$100 Valuation

Table 3 Estimated Direct Ad Valorem Taxes without property tax incentives

Year	Estimated Taxable Value for I&S	Estimated Taxable Value for M&O	Tax Rate ¹	Port Neches-Groves ISD I&S Levy	Port Neches-Groves ISD M&O Levy	Port Neches-Groves ISD M&O and I&S Tax Levies	Jefferson County Tax Levy	Sabine-Neches Navigation District Tax Levy	Jefferson County Drainage District #7 Tax Levy	Estimated Total Property Taxes	
			0.3481	0.3481	1.0400		0.3650	0.0279	0.1409		
2014	\$62,500,000	\$62,500,000		\$217,544	\$650,000	\$867,544	\$228,125	\$17,419	\$88,093	\$1,201,181	
2015	\$112,812,500	\$112,812,500		\$392,666	\$1,173,250	\$1,565,916	\$411,766	\$31,441	\$159,008	\$2,168,131	
2016	\$106,875,000	\$106,875,000		\$372,000	\$1,111,500	\$1,483,500	\$390,094	\$29,786	\$150,639	\$2,054,019	
2017	\$100,937,500	\$100,937,500		\$351,333	\$1,049,750	\$1,401,083	\$368,422	\$28,131	\$142,270	\$1,939,907	
2018	\$95,000,000	\$95,000,000		\$330,667	\$988,000	\$1,318,667	\$346,750	\$26,477	\$133,902	\$1,825,795	
2019	\$92,625,000	\$92,625,000		\$322,400	\$963,300	\$1,285,700	\$338,081	\$25,815	\$130,554	\$1,780,150	
2020	\$89,062,500	\$89,062,500		\$310,000	\$926,250	\$1,236,250	\$325,078	\$24,822	\$125,533	\$1,711,682	
2021	\$83,125,000	\$83,125,000		\$289,333	\$864,500	\$1,153,833	\$303,406	\$23,167	\$117,164	\$1,597,570	
2022	\$77,187,500	\$77,187,500		\$268,667	\$802,750	\$1,071,417	\$281,734	\$21,512	\$108,795	\$1,483,458	
2023	\$71,250,000	\$71,250,000		\$248,000	\$741,000	\$989,000	\$260,063	\$19,857	\$100,426	\$1,369,346	
2024	\$69,112,500	\$69,112,500		\$240,560	\$718,770	\$959,330	\$252,261	\$19,262	\$97,413	\$1,328,266	
2025	\$67,039,125	\$67,039,125		\$233,343	\$697,207	\$930,550	\$244,693	\$18,684	\$94,491	\$1,288,418	
2026	\$65,027,951	\$65,027,951		\$226,343	\$676,291	\$902,633	\$237,352	\$18,123	\$91,656	\$1,249,765	
2027	\$63,077,113	\$63,077,113		\$219,553	\$656,002	\$875,554	\$230,231	\$17,580	\$88,907	\$1,212,272	
2028	\$61,184,799	\$61,184,799		\$212,966	\$636,322	\$849,288	\$223,325	\$17,052	\$86,239	\$1,175,904	
						Total	\$16,890,265	\$4,441,380	\$339,127	\$1,715,091	\$23,385,862

Source: CPA, Huntsman Petrochemical, LLC

¹Tax Rate per \$100 Valuation

Attachment 1 includes schedules A, B, C, and D provided by the applicant in the application. Schedule A shows proposed investment. Schedule B is the projected market value of the qualified property. Schedule C contains employment information, and Schedule D contains tax expenditures and other tax abatement information.

Attachment 2, provided by the district and reviewed by the Texas Education Agency, contains information relating to the financial impact of the proposed project on the finances of the district as well as the tax benefit of the value limitation. "Table 5" in this attachment shows the estimated 15 year M&O tax levy without the value limitation agreement would be \$12,654,891. The estimated gross 15 year M&O tax benefit, or levy loss, is \$6,150,300.

Attachment 3 is an economic overview of Jefferson County.

Disclaimer: This examination is based on information from the application submitted to the school district and forwarded to the comptroller. It is intended to meet the statutory requirement of Chapter 313 of the Tax Code and is not intended for any other purpose.

Attachments

1. Schedules A, B, C, and D provided by applicant in application
2. School finance and tax benefit provided by district
3. County Economic Overview

Attachment 1

Applicant Name: HUNTSMAN PETROCHEMICAL LLC
 ISD Name: PORT NECHES-GROVES INDEPENDENT SCHOOL DISTRICT

PROPERTY INVESTMENT AMOUNTS

		(Estimated Investment in each year. Do not put cumulative totals.)									
	Year	School Year (YYYY-YYYY)	Tax Year (Fill in actual tax year below)	Column A: Tangible Personal Property (original cost) placed in service during this year	Column B: Building or permanent nonremovable component of building (annual amount only)	Column C: Sum of A and B Qualifying Investment (during the qualifying time period)	Column D: Other investment that is not qualified investment but investment affecting economic impact and total value	Column E: Total Investment (A+B+D)			
The year preceding the first complete tax year of the qualifying time period (assuming no deferrals)	Investment made before filing complete application with district (neither qualified property nor eligible to become qualified investment)										
	Investment made after filing complete application with district, but before final board approval of application (eligible to become qualified property)	2013-2014	2013	\$ 15,000,000.00				\$			
	Investment made after final board approval of application and before Jan. 1 of first complete tax year of qualifying time period (qualified investment and eligible to become qualified property)	2013-2014	2013					\$ 15,000,000.00			
	Complete tax years of qualifying time period	1	2014-2015	2014	\$ 47,500,000.00		\$ 47,500,000.00		\$ 47,500,000.00		
		2	2015-2016	2015	\$ 62,500,000.00		\$ 62,500,000.00		\$ 62,500,000.00		
		3	2016-2017	2016	\$		\$		\$		
		4	2017-2018	2017	\$		\$		\$		
		5	2018-2019	2018	\$		\$		\$		
		6	2019-2020	2019	\$		\$		\$		
		7	2020-2021	2020	\$		\$		\$		
		8	2021-2022	2021	\$		\$		\$		
		9	2022-2023	2022	\$		\$		\$		
		10	2023-2024	2023	\$		\$		\$		
	Tax Credit Period (with 50% cap on credit)	Value Limitation Period	11	2024-2025	2024	\$			\$		
			12	2025-2026	2025	\$			\$		
13			2026-2027	2026	\$			\$			
Credit Settle-Up Period	Continue to Maintain Viable Presence	14	2027-2028	2027	\$			\$			
		15	2028-2029	2028	\$			\$			
Post-Settle-Up Period	Post-Settle-Up Period							\$			
								\$			

Qualifying Time Period usually begins with the final board approval of the application and extends generally for the following two complete tax years.

Column A: This represents the total dollar amount of planned investment in tangible personal property the applicant considers qualified investment - as defined in Tax Code §313.021(1)(A)-(D). For the purposes of investment, please list amount invested each year, not cumulative totals.

Column B: The total dollar amount of planned investment each year in buildings or nonremovable component of buildings that the applicant considers qualified investment under Tax Code §313.021(1)(E).

Column C: For the years outside the qualifying time period, this number should simply represent the planned investment in tangible personal property. For the years outside the qualifying time period, please list amount invested each year, not cumulative totals.

Column D: Dollar value of other investment that may not be qualified investment but that may affect economic impact and total value for planning. The most significant example for many projects would be land. Other examples may be items such as professional services, etc.

Column E: Note: Land can be listed as part of investment during the "pre-year 1" time period. It cannot be part of qualifying investment.

Notes: For advanced clean energy projects, nuclear projects, projects with deferred qualifying time periods, and projects with lengthy application review periods, insert additional rows as needed. This schedule must be submitted with the original application and any application for tax credit. When using this schedule for any purpose other than the original application, replace original estimates with actual appraisal district data for past years and update estimates for current and future years. If original estimates have not changed, enter those amounts for future years.

G.W. Wierman
 SIGNATURE OF AUTHORIZED COMPANY REPRESENTATIVE

1/28/2013
 DATE

Schedule B (Rev. May 2010): Estimated Market And Taxable Value

Form 50-296

Applicant Name
 HUNTSMAN PETROCHEMICAL LLC
 ISD Name
 PORT NECHES-GROVES INDEPENDENT SCHOOL DISTRICT

	Year	School Year (YYYY-YYYY)	Tax Year (Fill in actual tax year) YYYY	Estimated Market Value of Land	Qualified Property		Reductions from Market Value	Estimated Taxable Value	
					Estimated Total Market Value of new buildings or other new improvements	Estimated Total Market Value of tangible personal property in the new building or "n" or on the new improvement"		Final taxable value for IGS - after all reductions	Final taxable value for MfO—after all reductions
	pre-year 1	2013-2014	2013	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Tax Credit Period (with 50% cap on credit)	1	2014-2015	2014	\$ -	\$ -	\$ 62,500,000	\$ -	\$ 62,500,000	\$ 62,500,000
	2	2015-2016	2015	\$ -	\$ -	\$ 118,750,000	\$ 5,937,500	\$ 112,812,500	\$ 112,812,500
	3	2016-2017	2016	\$ -	\$ -	\$ 112,500,000	\$ 5,625,000	\$ 106,875,000	\$ 30,000,000
	4	2017-2018	2017	\$ -	\$ -	\$ 106,250,000	\$ 5,312,500	\$ 100,937,500	\$ 30,000,000
	5	2018-2019	2018	\$ -	\$ -	\$ 100,000,000	\$ 5,000,000	\$ 95,000,000	\$ 30,000,000
	6	2019-2020	2019	\$ -	\$ -	\$ 97,500,000	\$ 4,875,000	\$ 92,625,000	\$ 30,000,000
	7	2020-2021	2020	\$ -	\$ -	\$ 93,750,000	\$ 4,687,500	\$ 89,062,500	\$ 30,000,000
	8	2021-2022	2021	\$ -	\$ -	\$ 87,500,000	\$ 4,375,000	\$ 83,125,000	\$ 30,000,000
	9	2022-2023	2022	\$ -	\$ -	\$ 81,250,000	\$ 4,062,500	\$ 77,187,500	\$ 30,000,000
	10	2023-2024	2023	\$ -	\$ -	\$ 75,000,000	\$ 3,750,000	\$ 71,250,000	\$ 30,000,000
	11	2024-2025	2024	\$ -	\$ -	\$ 72,750,000	\$ 3,637,500	\$ 69,112,500	\$ 69,112,500
	12	2025-2026	2025	\$ -	\$ -	\$ 70,567,500	\$ 3,528,375	\$ 67,039,125	\$ 67,039,125
	13	2026-2027	2026	\$ -	\$ -	\$ 68,450,475	\$ 3,422,524	\$ 65,027,951	\$ 65,027,951
	14	2027-2028	2027	\$ -	\$ -	\$ 66,396,961	\$ 3,319,848	\$ 63,077,113	\$ 63,077,113
	15	2028-2029	2028	\$ -	\$ -	\$ 64,405,052	\$ 3,220,253	\$ 61,184,799	\$ 61,184,799

Notes: Market value in future years is good faith estimate of future taxable value for the purposes of property taxation.

This schedule must be submitted with the original application and any application for tax credit. When using this schedule for any purpose other than the original application, replace original estimates with actual appraisal district data for past years and update estimates for current and future years. If original estimates have not changed, enter those amounts for future years.

GW Wienert

SIGNATURE OF AUTHORIZED COMPANY REPRESENTATIVE

1/28/2013

DATE

Schedule D: (Rev. May 2010): Other Tax Information

Applicant Name

HUNTSMAN PETROCHEMICAL LLC

ISD Name

PORT NECHES-GROVES INDEPENDENT SCI Form 50-296
Other Property Tax Abatements Sought

	Year	School Year (YYYY-YYYY)	Tax/Calendar Year YYYY	Sales Tax Information			Franchise Tax				City	Hospital	Other
				Column F: Estimate of total annual expenditures* subject to state sales tax	Column G: Estimate of total annual expenditures* made in Texas NOT subject to sales tax	Column H: Estimate of Franchise tax due from (or attributable to) the applicant	Fill in percentage exemption requested or granted in each year of the Agreement	Fill in percentage exemption requested or granted in each year of the Agreement	Fill in percentage exemption requested or granted in each year of the Agreement	Fill in percentage exemption requested or granted in each year of the Agreement			
The year preceding the first complete tax year of the qualifying time period (assuming no deferrals)		2013-2014	2013	\$ 50,000	\$ 150,050,000	\$ 5,300,000							
Complete tax years of qualifying time period	1	2014-2015	2014	\$ 100,000	\$ -	\$ 5,300,000	100.0					100.00	
	2	2015-2016	2015	\$ 100,000	\$ -	\$ 5,300,000	100.0					100.00	
	3	2016-2017	2016	\$ 100,000	\$ -	\$ 5,300,000	90.0					90.00	
	4	2017-2018	2017	\$ 100,000	\$ -	\$ 5,300,000	90.0					90.00	
	5	2018-2019	2018	\$ 100,000	\$ -	\$ 5,300,000	90.0					90.00	
	6	2019-2020	2019	\$ 100,000	\$ -	\$ 5,300,000	68.5					68.5	
	7	2020-2021	2020	\$ 100,000	\$ -	\$ 5,300,000	0.00					0.00	
	8	2021-2022	2021	\$ 100,000	\$ -	\$ 5,300,000							
	9	2022-2023	2022	\$ 100,000	\$ -	\$ 5,300,000							
	10	2023-2024	2023	\$ 100,000	\$ -	\$ 5,300,000							
	11	2024-2025	2024	\$ 100,000	\$ -	\$ 5,300,000							
	12	2025-2026	2025	\$ 100,000	\$ -	\$ 5,300,000							
	13	2026-2027	2026	\$ 100,000	\$ -	\$ 5,300,000							
	14	2027-2028	2027	\$ 100,000	\$ -	\$ 5,300,000							
	15	2028-2029	2028	\$ 100,000	\$ -	\$ 5,300,000							
Tax Credit Period (with 50% cap on credit)	Value Limitation Period												
Credit Settle-Up Period	Continue to Maintain Viable Presence												
Post-Settle-Up Period													
Post-Settle-Up Period													

*For planning, construction and operation of the facility.

GW

SIGNATURE OF AUTHORIZED COMPANY REPRESENTATIVE

DATE

1/28/2013

Attachment 2



TEXAS EDUCATION AGENCY

1701 North Congress Ave. • Austin, Texas 78701-1494 • 512 463-9734 • 512 463-9838 FAX • www.tea.state.tx.us

Michael L. Williams
Commissioner

May 13, 2013

Mr. Robert Wood
Director, Economic Development and Analysis
Texas Comptroller of Public Accounts
Lyndon B. Johnson State Office Building
111 East 17th Street
Austin, Texas 78774

Dear Mr. Wood:

The Texas Education Agency (TEA) has analyzed the revenue gains that would be realized by the proposed Huntsman Petrochemical project for the Port Neches-Groves Independent School District (PNGISD). Projections prepared by the TEA State Funding Division confirm the analysis that was prepared by Moak, Casey and Associates and provided to us by your division. We believe the firm's assumptions regarding the potential revenue gain are valid, and its estimates of the impact of the Huntsman Petrochemical project on PNGISD are correct.

Please feel free to contact me by phone at (512) 463-9186 or by email at al.mckenzie@tea.state.tx.us if you need further information regarding this issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Al McKenzie".

Al McKenzie, Manager
State Funding Division

AM/bd

May 13, 2013

Mr. Robert Wood
Director, Economic Development and Analysis
Texas Comptroller of Public Accounts
Lyndon B. Johnson State Office Building
111 East 17th Street
Austin, Texas 78774

Dear Mr. Wood:

As required by the Tax Code, §313.025 (b-1), the Texas Education Agency (TEA) has evaluated the impact of the proposed Huntsman Petrochemical LLC project on the number and size of school facilities in Port Neches-Groves Independent School District (PNGISD). Based on the analysis prepared by Moak, Casey and Associates for the school district and a conversation with the PNGISD superintendent, Dr. Rodney Cavness, the TEA has found that the Huntsman Petrochemical LLC project would not have a significant impact on the number or size of school facilities in PNGISD.

Please feel free to contact me by phone at (512) 463-9186 or by email at al.mckenzie@tea.state.tx.us if you need further information regarding this issue.

Sincerely,



Al McKenzie, Manager
State Funding Division

AM/bd

**SUMMARY OF FINANCIAL IMPACT OF THE PROPOSED HUNTSMAN
PETROCHEMICAL LLC PROJECT ON THE FINANCES OF THE PORT
NECHES-GROVES INDEPENDENT SCHOOL DISTRICT UNDER A
REQUESTED CHAPTER 313 PROPERTY VALUE LIMITATION**

March 11, 2013

Final Report

PREPARED BY



Estimated Impact of the Proposed Huntsman Petrochemical LLC Project on the Finances of the Port Neches-Groves Independent School District under a Requested Chapter 313 Property Value Limitation

Introduction

Huntsman Petrochemical LLC (Huntsman) has requested that the Port Neches-Groves Independent School District (PN-GISD) 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 PN-GISD on February 12, 2013, Huntsman proposes to invest \$125 million to expand its ethylene oxide project in PN-GISD.

The Huntsman 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, PN-GISD may offer a minimum value limitation of \$30 million. The provisions of Chapter 313 call for the project to be fully taxable in the 2014-15 and 2015-16 school years, unless the District and the Company 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 2014-15 and 2015-16 school years. Beginning in the 2016-17 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 could be assessed for debt service taxes on voter-approved bond issues throughout the limitation period, with PN-GISD currently levying a \$0.348 I&S tax rate. The full taxable value of the investment is expected to reach \$113 million in the 2015-16 school year, with depreciation expected to reduce the value of the project over the course of the value limitation agreement.

In the case of the Huntsman 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. PN-GISD would experience a revenue loss as a result of the implementation of the value limitation in the 2016-17 school year (-\$756,720). No additional revenue losses are expected for the out years under the limitation agreement, based on current school finance laws.

Under the assumptions outlined below, the potential tax benefits under a Chapter 313 agreement could reach an estimated \$5.4 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 of the agreement 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 or no 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. As a result of these changes, the number of ASATR districts is expected to be reduced to 421 in the 2012-13 school year, with 603 districts expected to be operating on state formulas.

Based on the estimates presented below, it appears that PN-GISD is no longer eligible for ASATR funding under the target revenue system, beginning with the 2012-13 school year. ASATR funding is not a factor in the calculations for the years the value limitation takes effect. PN-GISD has a target revenue level of \$5,292 per student which is just above the state average, so the fact that it became a formula district for the 2012-13 school year is consistent with the statewide trend described above.

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

Huntsman 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, although it does not appear to be a factor in these estimates. The projected taxable values of the Huntsman Petrochemical LLC project are included in the base model used here. The impact of the limitation value for the proposed Huntsman project is isolated separately and the focus of this analysis.

Student enrollment counts are held constant at 4,234 students in average daily attendance (ADA) in analyzing the effects of the Huntsman project on the finances of PN-GISD. The District's local tax base reached \$3.1 billion for the 2012 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. PN-GISD has estimated state property wealth per weighted ADA or WADA of approximately \$486,140 for the 2013-14 school year. 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 PN-GISD under the assumptions outlined above through the 2028-29 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 Huntsman 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 Huntsman value but imposes the proposed property value limitation effective in the third year, which in this case is the 2016-17 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, PN-GISD would experience a revenue loss as a result of the implementation of the value limitation in the 2016-17 school year (-\$756,720). The M&O tax savings to Huntsman are expected to total \$799,500 for the 2016-17 school year, with a corresponding \$32,834 reduction in recapture costs. Beyond the recapture reduction, there is little or no offset to the reduction in M&O tax collections. By the 2017-18 school year, the prior-year state property value reflects the \$30 million project value, resulting in lower recapture costs that offset the reduced M&O tax revenues as a result of the value limitation agreement.

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. Beginning with the 2011 state property value study, two value determinations are made for school districts granting Chapter 313 agreements, consistent with local practice. A consolidated single state property value had been provided previously.

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 in the first two years under the agreement. 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 tax savings from the value limitation total \$5.0 million over the life of the agreement. In addition, Huntsman would be eligible for a tax credit for M&O taxes paid on value in excess of the value limitation in each of the first 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 \$1.2 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 PN-GISD revenue losses are expected to total approximately -\$756,720, limited to the first limitation year under current-law funding formulas. In total, the potential net tax benefits (inclusive of tax credits but after hold-harmless payments are made) are estimated to reach \$5.4 million over the life of the agreement.

Facilities Funding Impact

The Huntsman project remains fully taxable for debt services taxes, with PN-GISD currently levying a \$0.348 I&S rate. The projected value increases associated with the project should assist the District in meeting its debt service needs.

The Huntsman project is not expected to affect PN-GISD in terms of enrollment. Ten full-time positions are anticipated once the project goes into operation. Continued expansion of the project and related development could result in additional employment in the area and an increase in the school-age population, but this project is unlikely to have much impact on a stand-alone basis.

Conclusion

The proposed Huntsman ethylene oxide project enhances the tax base of PN-GISD. 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 \$5.4 million. (This amount is net of any anticipated revenue losses for the District.) The additional taxable value also enhances the tax base of PN-GISD in meeting its future debt service obligations.

Table 1 – Base District Information with Huntsman Petrochemical LLC 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	2013-14	4,233.88	5,377.30	\$1.0400	\$0.3481	\$3,137,665,866	\$3,137,665,866	\$2,614,121,534	\$2,614,121,534	\$486,140	\$486,140
1	2014-15	4,233.88	5,377.30	\$1.0400	\$0.3481	\$3,200,165,866	\$3,200,165,866	\$2,614,121,534	\$2,614,121,534	\$486,140	\$486,140
2	2015-16	4,233.88	5,460.31	\$1.0400	\$0.3481	\$3,250,478,366	\$3,250,478,366	\$2,676,621,534	\$2,676,621,534	\$490,196	\$490,196
3	2016-17	4,233.88	5,460.31	\$1.0400	\$0.3481	\$3,244,540,866	\$3,167,665,866	\$2,726,934,034	\$2,726,934,034	\$499,410	\$499,410
4	2017-18	4,233.88	5,460.31	\$1.0400	\$0.3481	\$3,238,603,366	\$3,167,665,866	\$2,720,996,534	\$2,644,121,534	\$498,323	\$484,244
5	2018-19	4,233.88	5,460.31	\$1.0400	\$0.3481	\$3,232,665,866	\$3,167,665,866	\$2,715,059,034	\$2,644,121,534	\$497,235	\$484,244
6	2019-20	4,233.88	5,460.31	\$1.0400	\$0.3481	\$3,230,290,866	\$3,167,665,866	\$2,709,121,534	\$2,644,121,534	\$496,148	\$484,244
7	2020-21	4,233.88	5,460.31	\$1.0400	\$0.3481	\$3,226,728,366	\$3,167,665,866	\$2,706,746,534	\$2,644,121,534	\$495,713	\$484,244
8	2021-22	4,233.88	5,460.31	\$1.0400	\$0.3481	\$3,220,790,866	\$3,167,665,866	\$2,703,184,034	\$2,644,121,534	\$495,061	\$484,244
9	2022-23	4,233.88	5,460.31	\$1.0400	\$0.3481	\$3,214,853,366	\$3,167,665,866	\$2,697,246,534	\$2,644,121,534	\$493,973	\$484,244
10	2023-24	4,233.88	5,460.31	\$1.0400	\$0.3481	\$3,208,915,866	\$3,167,665,866	\$2,691,309,034	\$2,644,121,534	\$492,886	\$484,244
11	2024-25	4,233.88	5,460.31	\$1.0400	\$0.3481	\$3,206,778,366	\$3,206,778,366	\$2,685,371,534	\$2,644,121,534	\$491,798	\$484,244
12	2025-26	4,233.88	5,460.31	\$1.0400	\$0.3481	\$3,204,704,991	\$3,204,704,991	\$2,683,234,034	\$2,683,234,034	\$491,407	\$491,407
13	2026-27	4,233.88	5,460.31	\$1.0400	\$0.3481	\$3,202,693,817	\$3,202,693,817	\$2,681,160,659	\$2,681,160,659	\$491,027	\$491,027
14	2027-28	4,233.88	5,460.31	\$1.0400	\$0.3481	\$3,200,742,979	\$3,200,742,979	\$2,679,149,485	\$2,679,149,485	\$490,659	\$490,659
15	2028-29	4,233.88	5,460.31	\$1.0400	\$0.3481	\$3,198,850,665	\$3,198,850,665	\$2,677,198,647	\$2,677,198,647	\$490,302	\$490,302

*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	2013-14	\$29,843,988	\$1,398,385	\$0	\$0	-\$562,201	\$1,192,208	\$278,494	\$0	\$32,150,874
1	2014-15	\$30,456,518	\$1,398,385	\$0	\$0	-\$573,740	\$1,216,677	\$284,210	\$0	\$32,782,051
2	2015-16	\$30,949,606	\$1,536,092	\$0	\$0	-\$821,488	\$1,236,375	\$276,192	\$0	\$33,176,776
3	2016-17	\$30,891,415	\$1,832,464	\$0	\$0	-\$1,346,271	\$1,234,050	\$247,818	\$0	\$32,859,476
4	2017-18	\$30,833,225	\$1,536,092	\$0	\$0	-\$1,282,750	\$1,231,726	\$250,578	\$0	\$32,568,871
5	2018-19	\$30,775,034	\$1,832,464	\$0	\$0	-\$1,219,193	\$1,229,401	\$253,341	\$0	\$32,871,048
6	2019-20	\$30,751,758	\$1,536,092	\$0	\$0	-\$1,156,913	\$1,228,471	\$256,397	\$0	\$32,615,805
7	2020-21	\$30,716,844	\$1,832,464	\$0	\$0	-\$1,131,009	\$1,227,077	\$257,407	\$0	\$32,902,782
8	2021-22	\$30,658,654	\$1,536,092	\$0	\$0	-\$1,091,969	\$1,224,752	\$258,872	\$0	\$32,586,400
9	2022-23	\$30,600,463	\$1,832,464	\$0	\$0	-\$1,028,303	\$1,222,427	\$261,640	\$0	\$32,888,692
10	2023-24	\$30,542,273	\$1,536,092	\$0	\$0	-\$964,599	\$1,220,103	\$264,411	\$0	\$32,598,279
11	2024-25	\$30,521,324	\$1,832,464	\$0	\$0	-\$901,959	\$1,219,266	\$267,509	\$0	\$32,938,605
12	2025-26	\$30,501,004	\$1,832,464	\$0	\$0	-\$878,994	\$1,218,454	\$268,515	\$0	\$32,941,443
13	2026-27	\$30,481,294	\$1,832,464	\$0	\$0	-\$856,712	\$1,217,667	\$269,491	\$0	\$32,944,203
14	2027-28	\$30,462,174	\$1,832,464	\$0	\$0	-\$835,093	\$1,216,903	\$270,437	\$0	\$32,946,885
15	2028-29	\$30,443,629	\$1,832,464	\$0	\$0	-\$814,118	\$1,216,162	\$271,356	\$0	\$32,949,492

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

Year of Agreement	School Year	M&O Taxes @ Compressed Rate		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	2013-14	\$29,843,988	\$1,398,385	\$0	\$0	-\$562,201	\$1,192,208	\$278,494	\$0	\$32,150,874
1	2014-15	\$30,456,518	\$1,398,385	\$0	\$0	-\$573,740	\$1,216,677	\$284,210	\$0	\$32,782,051
2	2015-16	\$30,949,606	\$1,536,092	\$0	\$0	-\$821,488	\$1,236,375	\$276,192	\$0	\$33,176,776
3	2016-17	\$30,138,002	\$1,832,464	\$0	\$0	-\$1,313,437	\$1,203,953	\$241,774	\$0	\$32,102,756
4	2017-18	\$30,138,002	\$1,536,092	\$0	\$0	-\$457,862	\$1,203,953	\$287,053	\$0	\$32,707,239
5	2018-19	\$30,138,002	\$1,832,464	\$0	\$0	-\$457,862	\$1,203,953	\$287,053	\$0	\$33,003,611
6	2019-20	\$30,138,002	\$1,536,092	\$0	\$0	-\$457,862	\$1,203,953	\$287,053	\$0	\$32,707,239
7	2020-21	\$30,138,002	\$1,832,464	\$0	\$0	-\$457,862	\$1,203,953	\$287,053	\$0	\$33,003,611
8	2021-22	\$30,138,002	\$1,536,092	\$0	\$0	-\$457,862	\$1,203,953	\$287,053	\$0	\$32,707,239
9	2022-23	\$30,138,002	\$1,832,464	\$0	\$0	-\$457,862	\$1,203,953	\$287,053	\$0	\$33,003,611
10	2023-24	\$30,138,002	\$1,536,092	\$0	\$0	-\$457,862	\$1,203,953	\$287,053	\$0	\$32,707,239
11	2024-25	\$30,521,324	\$1,832,464	\$0	\$0	-\$463,685	\$1,219,266	\$290,704	\$0	\$33,400,073
12	2025-26	\$30,501,004	\$1,832,464	\$0	\$0	-\$878,994	\$1,218,454	\$268,515	\$0	\$32,941,443
13	2026-27	\$30,481,294	\$1,832,464	\$0	\$0	-\$856,712	\$1,217,667	\$269,491	\$0	\$32,944,203
14	2027-28	\$30,462,174	\$1,832,464	\$0	\$0	-\$835,093	\$1,216,903	\$270,437	\$0	\$32,946,885
15	2028-29	\$30,443,629	\$1,832,464	\$0	\$0	-\$814,118	\$1,216,162	\$271,356	\$0	\$32,949,492

Table 4 – Value Limit less Project Value with No Limit

Year of Agreement	School Year	M&O Taxes @ Compressed Rate		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	2013-14	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
1	2014-15	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2	2015-16	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
3	2016-17	-\$753,413	\$0	\$0	\$0	\$32,834	-\$30,097	-\$6,044	\$0	-\$756,720
4	2017-18	-\$695,222	\$0	\$0	\$0	\$824,888	-\$27,773	\$36,475	\$0	\$138,368
5	2018-19	-\$637,032	\$0	\$0	\$0	\$761,331	-\$25,448	\$33,712	\$0	\$132,563
6	2019-20	-\$613,756	\$0	\$0	\$0	\$699,051	-\$24,518	\$30,656	\$0	\$91,434
7	2020-21	-\$578,841	\$0	\$0	\$0	\$673,147	-\$23,124	\$29,646	\$0	\$100,828
8	2021-22	-\$520,651	\$0	\$0	\$0	\$634,108	-\$20,799	\$28,181	\$0	\$120,839
9	2022-23	-\$462,461	\$0	\$0	\$0	\$570,441	-\$18,474	\$25,413	\$0	\$114,919
10	2023-24	-\$404,270	\$0	\$0	\$0	\$506,737	-\$16,150	\$22,642	\$0	\$108,960
11	2024-25	\$0	\$0	\$0	\$0	\$438,274	\$0	\$23,195	\$0	\$461,468
12	2025-26	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
13	2026-27	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
14	2027-28	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
15	2028-29	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0

Table 5 - Estimated Financial Impact of the Huntsman Petrochemical LLC Project Property Value Limitation Request Submitted to PN-GISD at \$1.04 M&O Tax Rate

Year of Agreement	School Year	Project Value	Estimated Taxable Value	Value Savings	Assumed M&O Tax Rate	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	2013-14	\$0	\$0	\$0	\$1.040	\$0	\$0	\$0	\$0	\$0	\$0	\$0
1	2014-15	\$62,500,000	\$62,500,000	\$0	\$1.040	\$650,000	\$650,000	\$0	\$0	\$0	\$0	\$0
2	2015-16	\$112,812,500	\$112,812,500	\$0	\$1.040	\$1,173,250	\$1,173,250	\$0	\$0	\$0	\$0	\$0
3	2016-17	\$106,875,000	\$30,000,000	\$76,875,000	\$1.040	\$1,111,500	\$312,000	\$799,500	\$0	\$799,500	-\$756,720	\$42,780
4	2017-18	\$100,937,500	\$30,000,000	\$70,937,500	\$1.040	\$1,049,750	\$312,000	\$737,750	\$171,321	\$909,071	\$0	\$909,071
5	2018-19	\$95,000,000	\$30,000,000	\$65,000,000	\$1.040	\$988,000	\$312,000	\$676,000	\$171,321	\$847,321	\$0	\$847,321
6	2019-20	\$92,625,000	\$30,000,000	\$62,625,000	\$1.040	\$963,300	\$312,000	\$651,300	\$171,321	\$822,621	\$0	\$822,621
7	2020-21	\$89,062,500	\$30,000,000	\$59,062,500	\$1.040	\$926,250	\$312,000	\$614,250	\$171,321	\$785,571	\$0	\$785,571
8	2021-22	\$83,125,000	\$30,000,000	\$53,125,000	\$1.040	\$864,500	\$312,000	\$552,500	\$171,321	\$723,821	\$0	\$723,821
9	2022-23	\$77,187,500	\$30,000,000	\$47,187,500	\$1.040	\$802,750	\$312,000	\$490,750	\$171,321	\$662,071	\$0	\$662,071
10	2023-24	\$71,250,000	\$30,000,000	\$41,250,000	\$1.040	\$741,000	\$312,000	\$429,000	\$171,321	\$600,321	\$0	\$600,321
11	2024-25	\$69,112,500	\$69,112,500	\$0	\$1.040	\$718,770	\$718,770	\$0	\$0	\$0	\$0	\$0
12	2025-26	\$67,039,125	\$67,039,125	\$0	\$1.040	\$697,207	\$697,207	\$0	\$0	\$0	\$0	\$0
13	2026-27	\$65,027,951	\$65,027,951	\$0	\$1.040	\$676,291	\$676,291	\$0	\$0	\$0	\$0	\$0
14	2027-28	\$63,077,113	\$63,077,113	\$0	\$1.040	\$656,002	\$656,002	\$0	\$0	\$0	\$0	\$0
15	2028-29	\$61,184,799	\$61,184,799	\$0	\$1.040	\$636,322	\$636,322	\$0	\$0	\$0	\$0	\$0
Totals						\$12,654,891	\$7,703,841	\$4,951,050	\$1,199,250	\$6,150,300	-\$756,720	\$5,393,580
Tax Credit for Value Over Limit in First 2 Years								Year 1	Year 2	Max Credits		
								\$338,000	\$861,250	\$1,199,250		
								Credits Earned		\$1,199,250		
								Credits Paid		<u>\$1,199,250</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.

Attachment 3

Jefferson County

Population

- Total county population in 2010 for Jefferson County: 243,933 , up 0.2 percent from 2009. State population increased 1.8 percent in the same time period.
- Jefferson County was the state's 20st largest county in population in 2010 and the 181st fastest growing county from 2009 to 2010.
- Jefferson County's population in 2009 was 46.6 percent Anglo (below the state average of 46.7 percent), 34.1 percent African-American (above the state average of 11.3 percent) and 15.2 percent Hispanic (below the state average of 36.9 percent).
- 2009 population of the largest cities and places in Jefferson County:

Beaumont:	110,110	Port Arthur:	56,694
Nederland:	16,053	Groves:	14,299
Port Neches:	12,525	Bevil Oaks:	1,204
China:	1,023	Nome:	477
Taylor Landing:	211		

Economy and Income

Employment

- September 2011 total employment in Jefferson County: 105,661 , up 0.6 percent from September 2010. State total employment increased 0.9 percent during the same period.
(October 2011 employment data will be available November 18, 2011).
- September 2011 Jefferson County unemployment rate: 11.9 percent, up from 10.9 percent in September 2010. The statewide unemployment rate for September 2011 was 8.5 percent, up from 8.2 percent in September 2010.
- September 2011 unemployment rate in the city of:

Beaumont:	11.1 percent, up from 9.6 percent in September 2010.
Port Arthur:	14.9 percent, up from 14.4 percent in September 2010.

(Note: County and state unemployment rates are adjusted for seasonal fluctuations, but the Texas Workforce Commission city unemployment rates are not. Seasonally-adjusted unemployment rates are not comparable with unadjusted rates).

Income

- Jefferson County's ranking in per capita personal income in 2009: 59th with an average per capita income of \$37,139, up 0.1 percent from 2008. Statewide average per capita personal income was \$38,609 in 2009, down 3.1 percent from 2008.

Industry

- Agricultural cash values in Jefferson County averaged \$44.36 million annually from 2007 to 2010. County total agricultural values in 2010 were up 16.0 percent from 2009. Major agriculture related commodities in Jefferson County during 2010 included:
 - Aquaculture - Nursery - Hay - Rice - Other Beef
- 2011 oil and gas production in Jefferson County: 568,759.0 barrels of oil and 38.6 million Mcf of gas. In September 2011, there were 175 producing oil wells and 145 producing gas wells.

Taxes

Sales Tax - Taxable Sales

(County and city taxable sales data for 1st quarter 2011 is currently targeted for release in mid-September 2011).

Quarterly (September 2010 through December 2010)

- Taxable sales in Jefferson County during the fourth quarter 2010: \$840.90 million, up 7.2 percent from the same quarter in 2009.
- Taxable sales during the fourth quarter 2010 in the city of:

Beaumont:	\$561.42 million, up 6.5 percent from the same quarter in 2009.
Port Arthur:	\$161.68 million, up 6.1 percent from the same quarter in 2009.
Nederland:	\$36.71 million, down 9.8 percent from the same quarter in 2009.
Groves:	\$18.33 million, up 3.2 percent from the same quarter in 2009.
Port Neches:	\$10.90 million, up 7.2 percent from the same quarter in 2009.
Bevil Oaks:	\$328,690.00, up 28.6 percent from the same quarter in 2009.
China:	\$476,378.00, up 11.0 percent from the same quarter in 2009.
Nome:	\$589,066.00, down 41.1 percent from the same quarter in 2009.

Taxable Sales through the end of 4th quarter 2010 (January 2010 through December 30, 2010)

- Taxable sales in Jefferson County through the fourth quarter of 2010: \$3.07 billion, down 3.6 percent from the same period in 2009.
- Taxable sales through the fourth quarter of 2010 in the city of:

Beaumont:	\$2.05 billion, down 3.0 percent from the same period in 2009.
Port Arthur:	\$576.60 million, down 4.2 percent from the same period in 2009.

Nederland:	\$151.56 million, down 8.1 percent from the same period in 2009.
Groves:	\$73.47 million, down 2.4 percent from the same period in 2009.
Port Neches:	\$42.85 million, down 2.4 percent from the same period in 2009.
Bevil Oaks:	\$982,394.00, up 10.1 percent from the same period in 2009.
China:	\$1.63 million, up 0.1 percent from the same period in 2009.
Nome:	\$2.40 million, down 31.3 percent from the same period in 2009.

Annual (2010)

- Taxable sales in Jefferson County during 2010: \$3.07 billion, down 3.6 percent from 2009.
- Jefferson County sent an estimated \$191.61 million (or 1.12 percent of Texas' taxable sales) in state sales taxes to the state treasury in 2010.
- Taxable sales during 2010 in the city of:

Beaumont:	\$2.05 billion, down 3.0 percent from 2009.
Port Arthur:	\$576.60 million, down 4.2 percent from 2009.
Nederland:	\$151.56 million, down 8.1 percent from 2009.
Groves:	\$73.47 million, down 2.4 percent from 2009.
Port Neches:	\$42.85 million, down 2.4 percent from 2009.
Bevil Oaks:	\$982,394.00, up 10.1 percent from 2009.
China:	\$1.63 million, up 0.1 percent from 2009.
Nome:	\$2.40 million, down 31.3 percent from 2009.

Sales Tax – Local Sales Tax Allocations

(The release date for sales tax allocations to cities for the sales activity month of September 2011 is currently scheduled for November 9, 2011.)

Monthly

- Statewide payments based on the sales activity month of August 2011: \$505.22 million, up 13.9 percent from August 2010.
- Payments to all cities in Jefferson County based on the sales activity month of August 2011: \$4.92 million, up 28.6 percent from August 2010.
- Payment based on the sales activity month of August 2011 to the city of:

Beaumont:	\$2.86 million, up 14.7 percent from August 2010.
Port Arthur:	\$1.52 million, up 75.1 percent from August 2010.
Nederland:	\$328,832.49, up 25.1 percent from August 2010.
Groves:	\$120,684.08, up 6.6 percent from August 2010.
Port Neches:	\$85,567.84, up 3.5 percent from August 2010.
Bevil Oaks:	\$1,447.39, down 20.4 percent from August 2010.
China:	\$3,609.75, down 4.3 percent from August 2010.
Nome:	\$4,512.68, down 4.5 percent from August 2010.

Fiscal Year

- Statewide payments based on sales activity months from September 2010 through August 2011: \$6.08 billion, up 8.0 percent from the same period in 2010.
- Payments to all cities in Jefferson County based on sales activity months from September 2010 through August 2011: \$53.88 million, up 4.8 percent from fiscal 2010.
- Payments based on sales activity months from September 2010 through August 2011 to the city of:

Beaumont:	\$34.13 million, up 3.7 percent from fiscal 2010.
Port Arthur:	\$13.08 million, up 8.4 percent from fiscal 2010.
Nederland:	\$3.62 million, up 3.9 percent from fiscal 2010.
Groves:	\$1.66 million, up 1.3 percent from fiscal 2010.
Port Neches:	\$1.25 million, up 6.6 percent from fiscal 2010.
Bevil Oaks:	\$21,324.67, up 29.3 percent from fiscal 2010.
China:	\$59,742.82, down 12.9 percent from fiscal 2010.
Nome:	\$53,336.94, down 3.9 percent from fiscal 2010.

January 2011 through August 2011 (Sales Activity Year-To-Date)

- Statewide payments based on sales activity months through August 2011: \$3.99 billion, up 8.3 percent from the same period in 2010.
- Payments to all cities in Jefferson County based on sales activity months through August 2011: \$34.25 million, up 3.4 percent from the same period in 2010.

- Payments based on sales activity months through August 2011 to the city of:

Beaumont:	\$21.39 million, down 0.5 percent from the same period in 2010.
Port Arthur:	\$8.55 million, up 13.4 percent from the same period in 2010.
Nederland:	\$2.40 million, up 7.2 percent from the same period in 2010.
Groves:	\$1.05 million, unchanged 0.0 percent from the same period in 2010.
Port Neches:	\$777,953.02, up 6.8 percent from the same period in 2010.
Bevil Oaks:	\$13,829.51, up 28.9 percent from the same period in 2010.
China:	\$36,072.52, down 15.9 percent from the same period in 2010.
Nome:	\$34,192.72, down 5.8 percent from the same period in 2010.

12 months ending in August 2011

- Statewide payments based on sales activity in the 12 months ending in August 2011: \$6.08 billion, up 8.0 percent from the previous 12-month period.
- Payments to all cities in Jefferson County based on sales activity in the 12 months ending in August 2011: \$53.88 million, up 4.8 percent from the previous 12-month period.
- Payments based on sales activity in the 12 months ending in August 2011 to the city of:

Beaumont:	\$34.13 million, up 3.7 percent from the previous 12-month period.
Port Arthur:	\$13.08 million, up 8.4 percent from the previous 12-month period.
Nederland:	\$3.62 million, up 3.9 percent from the previous 12-month period.
Groves:	\$1.66 million, up 1.3 percent from the previous 12-month period.
Port Neches:	\$1.25 million, up 6.6 percent from the previous 12-month period.
Bevil Oaks:	\$21,324.67, up 29.3 percent from the previous 12-month period.
China:	\$59,742.82, down 12.9 percent from the previous 12-month period.
Nome:	\$53,336.94, down 3.9 percent from the previous 12-month period.

- *City Calendar Year-To-Date (RJ 2011)*

- Payment to the cities from January 2011 through October 2011:

Beaumont:	\$28.00 million, up 2.7 percent from the same period in 2010.
Port Arthur:	\$10.95 million, up 11.8 percent from the same period in 2010.
Nederland:	\$3.01 million, up 5.2 percent from the same period in 2010.
Groves:	\$1.35 million, down 0.4 percent from the same period in 2010.
Port Neches:	\$1.00 million, up 4.9 percent from the same period in 2010.
Bevil Oaks:	\$17,539.35, up 24.4 percent from the same period in 2010.
China:	\$49,163.51, down 12.1 percent from the same period in 2010.
Nome:	\$43,857.48, down 8.6 percent from the same period in 2010.

Annual (2010)

- Statewide payments based on sales activity months in 2010: \$5.77 billion, up 3.3 percent from 2009.
- Payments to all cities in Jefferson County based on sales activity months in 2010: \$52.76 million, down 5.8 percent from 2009.
- Payment based on sales activity months in 2010 to the city of:

Beaumont:	\$34.24 million, down 4.0 percent from 2009.
Port Arthur:	\$12.06 million, down 11.1 percent from 2009.
Nederland:	\$3.46 million, down 5.1 percent from 2009.
Groves:	\$1.66 million, down 5.1 percent from 2009.
Port Neches:	\$1.20 million, down 3.8 percent from 2009.
Bevil Oaks:	\$18,225.09, up 24.3 percent from 2009.
China:	\$66,583.42, down 18.2 percent from 2009.
Nome:	\$55,457.98, up 10.2 percent from 2009.

Property Tax

- As of January 2009, property values in Jefferson County: \$25.13 billion, down 3.8 percent from January 2008 values. The property tax base per person in Jefferson County is \$103,315, above the statewide average of \$85,809. About 2.8 percent of the property tax base is derived from oil, gas and minerals.

State Expenditures

- Jefferson County's ranking in state expenditures by county in fiscal year 2010: 17th. State expenditures in the county for FY2010: \$1.14 billion, up 0.3 percent from FY2009.

- In Jefferson County, 31 state agencies provide a total of 4,852 jobs and \$52.56 million in annualized wages (as of 1st quarter 2011).
- Major state agencies in the county (as of first quarter 2011):
 - Lamar University
 - Lamar Institute of Technology
 - Lamar University
 - Department of Criminal Justice
 - Texas Youth Commission

Higher Education

- Community colleges in Jefferson County fall 2010 enrollment:
 - None.
- Jefferson County is in the service area of the following:
 - Galveston College with a fall 2010 enrollment of 2,318 . Counties in the service area include:
 Chambers County
 Galveston County
 Jefferson County
- Institutions of higher education in Jefferson County fall 2010 enrollment:
 - Lamar University, a Public University (part of Texas State University System), had 13,969 students.
 - Lamar State College-Port Arthur, a Public State College (part of Texas State University System), had 2,374 students.
 - Lamar Institute of Technology, a Public State College (part of Texas State University System), had 3,243 students.

School Districts

- Jefferson County had 6 school districts with 69 schools and 40,215 students in the 2009-10 school year.
 (Statewide, the average teacher salary in school year 2009-10 was \$48,263. The percentage of students, statewide, meeting the 2010 TAKS passing standard for all 2009-10 TAKS tests was 77 percent.)
 - Beaumont ISD had 19,505 students in the 2009-10 school year. The average teacher salary was \$47,118. The percentage of students meeting the 2010 TAKS passing standard for all tests was 76 percent.
 - Hamshire-Fannett ISD had 1,752 students in the 2009-10 school year. The average teacher salary was \$41,481. The percentage of students meeting the 2010 TAKS passing standard for all tests was 86 percent.
 - Nederland ISD had 5,022 students in the 2009-10 school year. The average teacher salary was \$47,598. The percentage of students meeting the 2010 TAKS passing standard for all tests was 81 percent.
 - Port Arthur ISD had 9,047 students in the 2009-10 school year. The average teacher salary was \$45,029. The percentage of students meeting the 2010 TAKS passing standard for all tests was 58 percent.
 - Port Neches-Groves ISD had 4,586 students in the 2009-10 school year. The average teacher salary was \$47,318. The percentage of students meeting the 2010 TAKS passing standard for all tests was 81 percent.
 - Sabine Pass ISD had 303 students in the 2009-10 school year. The average teacher salary was \$47,538. The percentage of students meeting the 2010 TAKS passing standard for all tests was 90 percent.