TEXAS COMPTROLLER OF PUBLIC ACCOUNTS

April 13, 2026

AMENDED COMPLETENESS, CERTIFICATE & AGREEMENT APPROVAL

Torrey Price
Superintendent
Tahoka Independent School District
2300 Lockwood
Tahoka, Texas 79373

Re: Amendment Agreement for Limitation on Appraised Value of Property for School District Maintenance and Operations taxes by and between Tahoka Independent School District and Tahoka Wind, LLC, Application 1181

Dear Superintendent Price:

This application (Application 1181) was originally submitted on March 9, 2017, to the Tahoka Independent School District (school district) by Tahoka Wind, LLC (applicant) for a limitation on appraised value under the provisions of Tax Code Chapter 313.[1] On March 30, 2017, the Comptroller issued written notice that the applicant submitted a completed application; and later issued a certificate for a limitation on appraised value on April 13, 2017. The applicant and school district executed an agreement for a limitation on appraised value (agreement) on June 8, 2017.

On April 8, 2026, the Comptroller received an amendment to the agreement to reduce the number of qualified jobs from 6 to 1 and, subsequently, determined that it includes the information necessary to be determined as complete. This presents the Comptroller's review of that amendment per Section 10.2 of the agreement and determinations required:

1) under Section 313.025(h) to determine if the property meets the requirements of Section 313.024 for eligibility for a limitation on appraised value under Chapter 313, Subchapter C; and
2) under Section 313.025(d), to issue a certificate for a limitation on appraised value of the property and provide the certificate to the governing body of the school district or provide the governing body a written explanation of the Comptroller's decision not to issue a certificate, using the criteria set out in Section 313.026.

Determination required by 313.025(h)

The information provided by the applicant related to eligibility has not changed and therefore, the Comptroller has determined that the property meets the requirements of Section 313.024 for eligibility for a limitation on appraised value under Chapter 313, Subchapter C.

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

Certificate decision required by 313.025(d)

Determination required by 313.026(c)(1)

Based on the amended information provided by the applicant, the Comptroller has determined that the project proposed by the applicant is reasonably likely to generate tax revenue in an amount sufficient to offset the school district's maintenance and operations *ad valorem tax* revenue lost as a result of the agreement before the 25th anniversary of the beginning of the limitation period, see Attachment B.

Determination required by 313.026(c)(2)

The Comptroller previously determined that the limitation on appraised value is a determining factor in the applicant's decision to invest capital and construct the project in this state.

Based on these determinations, the Comptroller approves changes to the certificate for a limitation on appraised value for the amendment.

The Comptroller's review of the amended application and amended agreement assumes the accuracy and completeness of the statements in the amendment. If the amendment is approved by the school district, the applicant shall perform according to the provisions of the Texas Economic Development Act Agreement (Form 50-826) and all amendments, executed with the school district. The school district shall comply with and enforce the stipulations, provisions, terms, and conditions of the agreement, applicable Texas Administrative Code and Chapter 313, per TAC 9.1054(i)(3).

This approval is no longer valid if the information presented in the amendment changes, or the amended limitation agreement does not conform to the amended application. Additionally, this approval is contingent on the school district approving and executing the amendment to the agreement by **December 31, 2026.**

This office has also been provided with the Amended Agreement for Limitation on Appraised Value. As requested, the amendment to the Agreement has been reviewed pursuant to 34 TAC 9.1055(e)(1). Based on our review, this office concludes that the agreement complies with the provisions of Tax Code, Chapter 313 and 34 TAC Chapter 9, Subchapter F.

Should you have any questions, please contact Desiree Caufield, Manager, Data Analysis & Transparency, by email at desiree.caufield@cpa.texas.gov or by phone toll-free at 1-800-531-5441, ext. 6-8597, or at 512-936-8597.

Sincerely,

DocuSigned by:

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Will Counihan
Director
Data Analysis & Transparency

cc: Fred Stormer, Underwood Law Firm, P.C.
Brendan O'Neill, Orsted Onshore North America, LLC
Eric Jansen, Orsted Onshore North America, LLC
Brandon Westlake, Cummings Westlake, LLC

Amended Attachment A – Economic Impact Analysis

The following tables summarize the Comptroller's economic impact analysis of Tahoka Wind, LLC (project) applying to Tahoka Independent School District (district), as required by Tax Code, 313.026 and Texas Administrative Code 9.1055(d)(2).

Table 1 is a summary of investment, employment and tax impact of Tahoka Wind, LLC.

	Original	**Amendment No. 1**
Applicant	Tahoka Wind, LLC	Tahoka Wind, LLC
Tax Code, 313.024 Eligibility Category	Renewable Energy Electric Generation	Renewable Energy Electric Generation
School District	Tahoka ISD	Tahoka ISD
2015-2016 Average Daily Attendance	546	546
County	Lynn	Lynn
Proposed Total Investment in District	$352,640,000	$352,640,000
Proposed Qualified Investment	$342,640,000	$342,640,000
Limitation Amount	$20,000,000	$20,000,000
Qualifying Time Period (Full Years)	2018-2019	2018-2019
Number of new qualifying jobs committed to by applicant	6*	1*
Number of new non-qualifying jobs estimated by applicant	0	0
Average weekly wage of qualifying jobs committed to by applicant	$770	$770
Minimum weekly wage required for each qualifying job by Tax Code, 313.021(5)(B)	$770	$770
Minimum annual wage committed to by applicant for qualified jobs	$40,049	$40,049
Minimum weekly wage required for non-qualifying jobs	$797	$797
Minimum annual wage required for non-qualifying jobs	$41,445	$41,445
Investment per Qualifying Job	$58,773,333	$352,640,000
Estimated M&O levy without any limit (15 years)	$35,062,402	$35,062,402
Estimated M&O levy with Limitation (15 years)	$9,618,749	$9,618,749
Estimated gross M&O tax benefit (15 years)	$25,443,653	$25,443,653

** Applicant is requesting district to waive requirement to create minimum number of qualifying jobs pursuant to Tax Code, 313.025 (f-1).*

Table 2 is the estimated statewide economic impact of Tahoka Wind, LLC (modeled).

	Employment			**Personal Income**		
Year	Direct	Indirect + Induced	Total	Direct	Indirect + Induced	Total
2018	200	1,726	1926	$8,000,000	$107,230,000	$115,230,000
2019	6	62	68	$240,293	$13,429,707	$13,670,000
2020	6	17	23	$240,293	$8,919,707	$9,160,000
2021	6	(14)	-8	$240,293	$4,519,707	$4,760,000
2022	6	(33)	-27	$240,293	$1,839,707	$2,080,000
2023	6	(37)	-31	$240,293	$129,707	$370,000
2024	6	(39)	-33	$240,293	-$480,293	-$240,000
2025	6	(31)	-25	$240,293	-$1,340,293	-$1,100,000
2026	1	(24)	-23	$40,049	-$1,140,049	-$1,100,000
2027	1	(19)	-18	$40,049	-$770,049	-$730,000
2028	1	(13)	-12	$40,049	-$770,049	-$730,000
2029	1	(17)	-16	$40,049	-$770,049	-$730,000
2030	1	(11)	-10	$40,049	-$1,020,049	-$980,000
2031	1	(11)	-10	$40,049	-$1,260,049	-$1,220,000
2032	1	(9)	-8	$40,049	-$1,020,049	-$980,000
2033	1	(9)	-8	$40,049	-$1,260,049	-$1,220,000

Source: CPA REMI, Tahoka Wind, LLC

Table 3 examines the estimated direct impact on ad valorem taxes to the region if all taxes are assessed.

Year	**Estimated Taxable Value for I&S**	**Estimated Taxable Value for M&O**		**Tahoka ISD I&S Tax Levy**	**Tahoka ISD M&O Tax Levy**	**Tahoka ISD M&O and I&S Tax Levies**	**Lynn County Tax Levy**	**Lynn County Hospital District Tax Levy**	**High Plains Underground Water Conservation District No. 1 Tax Levy**	**Estimated Total Property Taxes**
			Tax Rate*	**0.2860**	**1.1700**		**0.8900**	**0.2922**	**0.0075**	
2019	$335,787,200	$335,787,200		$960,351	$3,928,710	$4,889,062	$2,988,506	$981,170	$25,184	$8,883,922
2020	$308,943,824	$308,943,824		$883,579	$3,614,643	$4,498,222	$2,749,600	$902,734	$23,171	$8,173,727
2021	$284,246,742	$284,246,742		$812,946	$3,325,687	$4,138,633	$2,529,796	$830,569	$21,319	$7,520,316
2022	$261,524,321	$261,524,321		$747,960	$3,059,835	$3,807,794	$2,327,566	$764,174	$19,614	$6,919,149
2023	$240,618,655	$240,618,655		$688,169	$2,815,238	$3,503,408	$2,141,506	$703,088	$18,046	$6,366,048
2024	$221,384,465	$221,384,465		$633,160	$2,590,198	$3,223,358	$1,970,322	$646,885	$16,604	$5,857,169
2025	$203,688,093	$203,688,093		$582,548	$2,383,151	$2,965,699	$1,812,824	$595,177	$15,277	$5,388,976
2026	$187,406,567	$187,406,567		$535,983	$2,192,657	$2,728,640	$1,667,918	$547,602	$14,055	$4,958,216
2027	$172,426,751	$172,426,751		$493,141	$2,017,393	$2,510,534	$1,534,598	$503,831	$12,932	$4,561,895
2028	$158,644,559	$158,644,559		$453,723	$1,856,141	$2,309,865	$1,411,937	$463,559	$11,898	$4,197,259
2029	$145,964,225	$145,964,225		$417,458	$1,707,781	$2,125,239	$1,299,082	$426,507	$10,947	$3,861,775
2030	$134,297,644	$134,297,644		$384,091	$1,571,282	$1,955,374	$1,195,249	$392,418	$10,072	$3,553,113
2031	$123,563,756	$123,563,756		$353,392	$1,445,696	$1,799,088	$1,099,717	$361,053	$9,267	$3,269,126
2032	$113,687,983	$113,687,983		$325,148	$1,330,149	$1,655,297	$1,011,823	$332,196	$8,527	$3,007,843
2033	$104,601,713	$104,601,713		$299,161	$1,223,840	$1,523,001	$930,955	$305,646	$7,845	$2,767,448
			Total	**$8,570,809**	**$35,062,402**	**$43,633,211**	**$26,671,400**	**$8,756,610**	**$224,759**	**$79,285,980**

Source: CPA, Tahoka Wind, LLC

*Tax Rate per $100 Valuation

Table 4 examines the estimated direct impact on ad valorem taxes to the school district and Lynn County, with all property tax incentives sought being granted using estimated market value from the application. The project has applied for a value limitation under Chapter 313, Tax Code and tax abatement with the county.

The difference noted in the last line is the difference between the totals in Table 3 and Table 4.

Year	Estimated Taxable Value for I&S	Estimated Taxable Value for M&O		Tahoka ISD I&S Tax Levy	Tahoka ISD M&O Tax Levy	Tahoka ISD M&O and I&S Tax Levies	Lynn County Tax Levy	Lynn County Hospital District Tax Levy	High Plains Underground Water Conservation District No. 1 Tax Levy	Estimated Total Property Taxes
			Tax Rate*	**0.2860**	**1.1700**		**0.8900**	**0.2922**	**0.0075**	
2019	$335,787,200	$20,000,000		$960,351	$234,000	$1,194,351	$0	$196,234	$25,184	$1,415,769
2020	$308,943,824	$20,000,000		$883,579	$234,000	$1,117,579	$0	$180,547	$23,171	$1,321,297
2021	$284,246,742	$20,000,000		$812,946	$234,000	$1,046,946	$0	$166,114	$21,319	$1,234,378
2022	$261,524,321	$20,000,000		$747,960	$234,000	$981,960	$0	$305,670	$19,614	$1,307,244
2023	$240,618,655	$20,000,000		$688,169	$234,000	$922,169	$0	$281,235	$18,046	$1,221,451
2024	$221,384,465	$20,000,000		$633,160	$234,000	$867,160	$0	$258,754	$16,604	$1,142,518
2025	$203,688,093	$20,000,000		$582,548	$234,000	$816,548	$0	$357,106	$15,277	$1,188,931
2026	$187,406,567	$20,000,000		$535,983	$234,000	$769,983	$0	$328,561	$14,055	$1,112,599
2027	$172,426,751	$20,000,000		$493,141	$234,000	$727,141	$0	$302,299	$12,932	$1,042,371
2028	$158,644,559	$20,000,000		$453,723	$234,000	$687,723	$0	$278,136	$11,898	$977,757
2029	$145,964,225	$145,964,225		$417,458	$1,707,781	$2,125,239	$1,299,082	$426,507	$10,947	$3,861,775
2030	$134,297,644	$134,297,644		$384,091	$1,571,282	$1,955,374	$1,195,249	$392,418	$10,072	$3,553,113
2031	$123,563,756	$123,563,756		$353,392	$1,445,696	$1,799,088	$1,099,717	$361,053	$9,267	$3,269,126
2032	$113,687,983	$113,687,983		$325,148	$1,330,149	$1,655,297	$1,011,823	$332,196	$8,527	$3,007,843
2033	$104,601,713	$104,601,713		$299,161	$1,223,840	$1,523,001	$930,955	$305,646	$7,845	$2,767,448
			Total	**$8,570,809**	**$9,618,749**	**$18,189,559**	**$5,536,826**	**$4,472,476**	**$224,759**	**$28,423,620**
			Diff	**$0**	**$25,443,653**	**$25,443,653**	**$21,134,573**	**$4,284,134**	**$0**	**$50,862,361**

Assumes School Value Limitation and Tax Abatements with the County.

Source: CPA, Tahoka Wind, LLC

*Tax Rate per $100 Valuation

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

Attachment B – Tax Revenue before 25th Anniversary of Limitation Start

This represents the Comptroller's determination that Tahoka Wind, LLC (project) is reasonably likely to generate, before the 25th anniversary of the beginning of the limitation period, tax revenue in an amount sufficient to offset the school district maintenance and operations ad valorem tax revenue lost as a result of the agreement. This evaluation is based on an analysis of the estimated M&O portion of the school district property tax levy and direct, indirect and induced tax effects from project employment directly related to this project, using estimated taxable values provided in the application.

	Tax Year	Estimated ISD M&O Tax Levy Generated (Annual)	Estimated ISD M&O Tax Levy Generated (Cumulative)	Estimated ISD M&O Tax Levy Loss as Result of Agreement (Annual)	Estimated ISD M&O Tax Levy Loss as Result of Agreement (Cumulative)
Limitation Pre-Years	2016	$0	$0	$0	$0
	2017	$0	$0	$0	$0
	2018	$0	$0	$0	$0
Limitation Period (10 Years)	2019	$234,000	$234,000	$3,694,710	$3,694,710
	2020	$234,000	$468,000	$3,380,643	$7,075,353
	2021	$234,000	$702,000	$3,091,687	$10,167,040
	2022	$234,000	$936,000	$2,825,835	$12,992,874
	2023	$234,000	$1,170,000	$2,581,238	$15,574,113
	2024	$234,000	$1,404,000	$2,356,198	$17,930,311
	2025	$234,000	$1,638,000	$2,149,151	$20,079,462
	2026	$234,000	$1,872,000	$1,958,657	$22,038,118
	2027	$234,000	$2,106,000	$1,783,393	$23,821,511
	2028	$234,000	$2,340,000	$1,622,141	$25,443,653
Maintain Viable Presence (5 Years)	2029	$1,707,781	$4,047,781	$0	$25,443,653
	2030	$1,571,282	$5,619,064	$0	$25,443,653
	2031	$1,445,696	$7,064,760	$0	$25,443,653
	2032	$1,330,149	$8,394,909	$0	$25,443,653
	2033	$1,223,840	$9,618,749	$0	$25,443,653
Additional Years as Required by 313.026(c)(1) (10 Years)	2034	$1,126,029	$10,744,779	$0	$25,443,653
	2035	$1,036,038	$11,780,816	$0	$25,443,653
	2036	$953,240	$12,734,056	$0	$25,443,653
	2037	$877,061	$13,611,117	$0	$25,443,653
	2038	$806,971	$14,418,088	$0	$25,443,653
	2039	$786,775	$15,204,863	$0	$25,443,653
	2040	$786,576	$15,991,439	$0	$25,443,653
	2041	$786,388	$16,777,827	$0	$25,443,653
	2042	$786,212	$17,564,038	$0	$25,443,653
	2043	$786,046	$18,350,084	$0	$25,443,653
		$18,350,084	is less than	**$25,443,653**	

Analysis Summary	
Is the project reasonably likely to generate tax revenue in an amount sufficient to offset the M&O levy loss as a result of the limitation agreement?	No

NOTE: The analysis above only takes into account this project's estimated impact on the M&O portion of the school district property tax levy directly related to this project.

Source: CPA, Tahoka Wind, LLC

	Employment			Personal Income			Revenue & Expenditure		
Year	Direct	Indirect + Induced	Total	Direct	Indirect + Induced	Total	Revenue	Expenditure	Net Tax Effect
2018	200	1,726	1926	$8,000,000	$107,230,000	$115,230,000	14870000	-3520000	$18,390,000
2019	6	62	68	$240,293	$13,429,707	$13,670,000	660000	1340000	-$680,000
2020	6	17	23	$240,293	$8,919,707	$9,160,000	540000	1310000	-$770,000
2021	6	(14)	-8	$240,293	$4,519,707	$4,760,000	320000	1240000	-$920,000
2022	6	(33)	-27	$240,293	$1,839,707	$2,080,000	180000	1110000	-$930,000
2023	6	(37)	-31	$240,293	$129,707	$370,000	80000	950000	-$870,000
2024	6	(39)	-33	$240,293	-$480,293	-$240,000	80000	810000	-$730,000
2025	6	(31)	-25	$240,293	-$1,340,293	-$1,100,000	50000	690000	-$640,000
2026	1	(24)	-23	$40,049	-$1,140,049	-$1,100,000	30000	550000	-$520,000
2027	1	(19)	-18	$40,049	-$770,049	-$730,000	-20000	400000	-$420,000
2028	1	(13)	-12	$40,049	-$770,049	-$730,000	-60000	290000	-$350,000
2029	1	(17)	-16	$40,049	-$770,049	-$730,000	-100000	190000	-$290,000
2030	1	(11)	-10	$40,049	-$1,020,049	-$980,000	-110000	70000	-$180,000
2031	1	(11)	-10	$40,049	-$1,260,049	-$1,220,000	-140000	-10000	-$130,000
2032	1	(9)	-8	$40,049	-$1,020,049	-$980,000	-170000	-90000	-$80,000
2033	1	(9)	-8	$40,049	-$1,260,049	-$1,220,000	-190000	-200000	$10,000
2034	1	(13)	-12	$40,049	-$1,020,049	-$980,000	-220000	-260000	$40,000
2035	1	(13)	-12	$40,049	-$1,260,049	-$1,220,000	-230000	-320000	$90,000
2036	1	(13)	-12	$40,049	-$1,500,049	-$1,460,000	-270000	-410000	$140,000
2037	1	(13)	-12	$40,049	-$1,750,049	-$1,710,000	-270000	-500000	$230,000
2038	1	(19)	-18	$40,049	-$2,240,049	-$2,200,000	-270000	-530000	$260,000
2039	1	(15)	-14	$40,049	-$1,990,049	-$1,950,000	-310000	-630000	$320,000
2040	1	(17)	-16	$40,049	-$3,210,049	-$3,170,000	-350000	-690000	$340,000
2041	1	(17)	-16	$40,049	-$2,970,049	-$2,930,000	-350000	-750000	$400,000
2042	1	(22)	-21	$40,049	-$3,700,049	-$3,660,000	-380000	-780000	$400,000
2043	1	(24)	-23	$40,049	-$3,950,049	-$3,910,000	-350000	-810000	$460,000
						Total	$13,020,000	-$550,000	$13,570,000
							$31,920,084	is greater than	$25,443,653

Analysis Summary	
Is the project reasonably likely to generate tax revenue in an amount sufficient to offset the M&O levy loss as a result of the limitation agreement?	Yes

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.