



TEXAS COMPTROLLER OF PUBLIC ACCOUNTS

November 24, 2025

AMENDED COMPLETENESS,
CERTIFICATE & AGREEMENT
APPROVAL

Dr. Shane Reyenga
Superintendent
Kountze Independent School District
160 W. Vaughn Street
Kountze, Texas 77625

Re: Amendment Agreement for Limitation on Appraised Value of Property for School District Maintenance and Operations taxes by and between Kountze Independent School District and Lumberton PV I, LLC, Application 1860

Dear Dr. Reyenga:

This application (Application 1860) was originally submitted on April 11, 2022, to the Kountze Independent School District (school district) by Lumberton PV I, LLC (applicant) for a limitation on appraised value under the provisions of Tax Code Chapter 313.¹ On September 12, 2022, the Comptroller issued written notice that the applicant submitted a completed application; and later issued a certificate for a limitation on appraised value on December 1, 2022. The applicant and school district executed an agreement for a limitation on appraised value (agreement) on December 19, 2022.

On November 14, 2025, the Comptroller received an amendment to the agreement to move the start of the limitation from 2026 to 2029 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, 2025**.

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:

8FDFC70F5753487...

Will Counihan
Director
Data Analysis & Transparency

cc: Sara Leon, Leon Alcala, PLLC
Hy Martin, DESRI
David Zwillinger, DESRI
Mike Fry, KE Andrews

Amended Attachment A - Economic Impact Analysis

The following tables summarize the Comptroller’s economic impact analysis of Lumberton PV I, LLC (project) applying to Kountze 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 Lumberton PV I, LLC.

	Original	Amendment No. 1
Applicant	Lumberton PV I, LLC	Lumberton PV I, LLC
Tax Code, 313.024 Eligibility Category	Renewable Energy - Solar	Renewable Energy - Solar
School District	Kountze ISD	Kountze ISD
2020-2021 Average Daily Attendance	1,007	1,007
County	Hardin	Hardin
Proposed Total Investment in District	\$211,230,463	\$211,230,463
Proposed Qualified Investment	\$211,230,463	\$10,000,000
Limitation Amount	\$20,000,000	\$20,000,000
Qualifying Time Period (Full Years)	2024-2025	2024-2025
Number of new qualifying jobs committed to by applicant	2*	2*
Number of new non-qualifying jobs estimated by applicant	0	0
Average weekly wage of qualifying jobs committed to by applicant	\$969	\$969
Minimum weekly wage required for each qualifying job by Tax Code, 313.021(5)(B)	\$969	\$969
Minimum annual wage committed to by applicant for qualified jobs	\$50,406	\$50,406
Minimum weekly wage required for non-qualifying jobs	\$918	\$918
Minimum annual wage required for non-qualifying jobs	\$47,736	\$47,736
Investment per Qualifying Job	\$105,615,232	\$105,615,232
Estimated M&O levy without any limit (15 years)	\$15,698,763	\$12,293,4698
Estimated M&O levy with Limitation (15 years)	\$4,813,167	\$3,692,042
Estimated gross M&O tax benefit (15 years)	\$10,885,596	\$8,601,456

* 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 Lumberton PV I, LLC (modeled).

Year	Employment			Personal Income		
	Direct	Indirect + Induced	Total	Direct	Indirect + Induced	Total
2025	200	200	400	\$8,000,000	\$20,560,000	\$28,560,000
2026	200	425	625	\$8,000,000	\$41,800,000	\$49,800,000
2027	200	597	797	\$8,000,000	\$60,850,000	\$68,850,000
2028	200	183	383	\$8,000,000	\$31,060,000	\$39,060,000
2029	2	(0)	2	\$100,813	\$9,669,187	\$9,770,000
2030	2	(29)	-27	\$100,813	\$4,049,187	\$4,150,000
2031	2	(47)	-45	\$100,813	\$389,187	\$490,000
2032	2	(49)	-47	\$100,813	-\$2,300,813	-\$2,200,000
2033	2	(49)	-47	\$100,813	-\$3,270,813	-\$3,170,000
2034	2	(43)	-41	\$100,813	-\$3,270,813	-\$3,170,000
2035	2	(35)	-33	\$100,813	-\$3,520,813	-\$3,420,000
2036	2	(25)	-23	\$100,813	-\$2,790,813	-\$2,690,000
2037	2	(22)	-20	\$100,813	-\$2,300,813	-\$2,200,000
2038	2	(18)	-16	\$100,813	-\$2,300,813	-\$2,200,000
2039	2	(10)	-8	\$100,813	-\$830,813	-\$730,000
2040	2	(6)	-4	\$100,813	-\$830,813	-\$730,000
2041	2	(0)	2	\$100,813	-\$1,080,813	-\$980,000
2042	2	(0)	2	\$100,813	-\$340,813	-\$240,000
2043	2	(2)	0	\$100,813	-\$100,813	\$0

Source: CPA REMI, Lumberton PV I, 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	Tax Rate*	Kountze ISD I&S Tax Levy	Kountz ISD M&O Tax Levy	Kountz ISD M&O and I&S Tax Levies	Hardin County Tax Levy	ESD #1 Tax Levy	Estimated Total Property Taxes
				0.1120	0.7780		0.5025	0.0412	
2026	\$10,000,000	\$10,000,000		\$11,200	\$77,800	\$89,000	\$50,247	\$4,119	\$143,366
2027	\$10,000,000	\$10,000,000		\$11,200	\$77,800	\$89,000	\$50,247	\$4,119	\$143,366
2028	\$42,225,000	\$42,225,000		\$47,292	\$328,511	\$375,803	\$212,169	\$17,390	\$605,362
2029	\$211,230,463	\$211,230,463		\$236,578	\$1,643,373	\$1,879,951	\$1,061,376	\$86,995	\$3,028,322
2030	\$193,303,374	\$193,303,374		\$216,500	\$1,503,900	\$1,720,400	\$971,297	\$79,612	\$2,771,309
2031	\$175,376,284	\$175,376,284		\$196,421	\$1,364,427	\$1,560,849	\$881,218	\$72,229	\$2,514,296
2032	\$157,449,195	\$157,449,195		\$176,343	\$1,224,955	\$1,401,298	\$791,140	\$64,845	\$2,257,283
2033	\$139,522,106	\$139,522,106		\$156,265	\$1,085,482	\$1,241,747	\$701,061	\$57,462	\$2,000,270
2034	\$121,595,016	\$121,595,016		\$136,186	\$946,009	\$1,082,196	\$610,982	\$50,079	\$1,743,257
2035	\$103,667,927	\$103,667,927		\$116,108	\$806,536	\$922,645	\$520,903	\$42,696	\$1,486,244
2036	\$85,740,838	\$85,740,838		\$96,030	\$667,064	\$763,093	\$430,825	\$35,312	\$1,229,230
2037	\$67,813,748	\$67,813,748		\$75,951	\$527,591	\$603,542	\$340,746	\$27,929	\$972,217
2038	\$49,886,659	\$49,886,659		\$55,873	\$388,118	\$443,991	\$250,667	\$20,546	\$715,204
2039	\$42,496,093	\$42,496,093		\$47,596	\$330,620	\$378,215	\$213,531	\$17,502	\$609,249
2040	\$42,481,093	\$42,481,093		\$47,579	\$330,503	\$378,082	\$213,456	\$17,496	\$609,034
2041	\$42,466,093	\$42,466,093		\$47,562	\$330,386	\$377,948	\$213,381	\$17,490	\$608,819
2042	\$42,451,093	\$42,451,093		\$47,545	\$330,270	\$377,815	\$213,305	\$17,483	\$608,603
2043	\$42,436,093	\$42,436,093		\$47,528	\$330,153	\$377,681	\$213,230	\$17,477	\$608,388
			Total	\$1,769,758	\$12,293,498	\$14,063,256	\$7,939,782	\$650,781	\$22,653,819

Source: CPA, Lumberton PV I, LLC

*Tax Rate per \$100 Valuation

Table 4 examines the estimated direct impact on ad valorem taxes to the school district and Hardin 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		Kountze ISD I&S Tax Levy	Kountz ISD M&O Tax Levy	Kountz ISD M&O and I&S Tax Levies	Hardin County Tax Levy	ESD #1 Tax Levy	Estimated Total Property Taxes
			Tax Rate*	0.1120	0.7780		0.5025	0.0412	
2026	\$10,000,000	\$10,000,000		\$11,200	\$77,800	\$89,000	\$20,099	\$4,119	\$113,217
2027	\$10,000,000	\$10,000,000		\$11,200	\$77,800	\$89,000	\$20,099	\$4,119	\$113,217
2028	\$42,225,000	\$42,225,000		\$47,292	\$328,511	\$375,803	\$84,868	\$17,390	\$478,061
2029	\$211,230,463	\$20,000,000		\$236,578	\$155,600	\$392,178	\$424,550	\$86,995	\$903,724
2030	\$193,303,374	\$20,000,000		\$216,500	\$155,600	\$372,100	\$388,519	\$79,612	\$840,231
2031	\$175,376,284	\$20,000,000		\$196,421	\$155,600	\$352,021	\$352,487	\$72,229	\$776,738
2032	\$157,449,195	\$20,000,000		\$176,343	\$155,600	\$331,943	\$316,456	\$64,845	\$713,244
2033	\$139,522,106	\$20,000,000		\$156,265	\$155,600	\$311,865	\$280,424	\$57,462	\$649,751
2034	\$121,595,016	\$20,000,000		\$136,186	\$155,600	\$291,786	\$244,393	\$50,079	\$586,258
2035	\$103,667,927	\$20,000,000		\$116,108	\$155,600	\$271,708	\$208,361	\$42,696	\$522,765
2036	\$85,740,838	\$20,000,000		\$96,030	\$155,600	\$251,630	\$430,825	\$35,312	\$717,767
2037	\$67,813,748	\$20,000,000		\$75,951	\$155,600	\$231,551	\$340,746	\$27,929	\$600,226
2038	\$49,886,659	\$20,000,000		\$55,873	\$155,600	\$211,473	\$250,667	\$20,546	\$482,686
2039	\$42,496,093	\$42,496,093		\$47,596	\$330,620	\$378,215	\$213,531	\$17,502	\$609,249
2040	\$42,481,093	\$42,481,093		\$47,579	\$330,503	\$378,082	\$213,456	\$17,496	\$609,034
2041	\$42,466,093	\$42,466,093		\$47,562	\$330,386	\$377,948	\$213,381	\$17,490	\$608,819
2042	\$42,451,093	\$42,451,093		\$47,545	\$330,270	\$377,815	\$213,305	\$17,483	\$608,603
2043	\$42,436,093	\$42,436,093		\$47,528	\$330,153	\$377,681	\$213,230	\$17,477	\$608,388
			Total	\$1,769,758	\$3,692,042	\$5,461,800	\$4,429,397	\$650,781	\$10,541,978
			Diff	\$0	\$8,601,456	\$8,601,456	\$3,510,385	\$0	\$12,111,841

Assumes School Value Limitation and Tax Abatements with the County.

Source: CPA, Lumberton PV I, 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 Lumberton PV I, 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	2026	\$77,800	\$77,800	\$0	\$0
	2027	\$77,800	\$155,600	\$0	\$0
	2028	\$328,511	\$484,111	\$0	\$0
Limitation Period (10 Years)	2029	\$155,600	\$639,711	\$1,487,773	\$1,487,773
	2030	\$155,600	\$795,311	\$1,348,300	\$2,836,073
	2031	\$155,600	\$950,911	\$1,208,827	\$4,044,901
	2032	\$155,600	\$1,106,511	\$1,069,355	\$5,114,255
	2033	\$155,600	\$1,262,111	\$929,882	\$6,044,137
	2034	\$155,600	\$1,417,711	\$790,409	\$6,834,547
	2035	\$155,600	\$1,573,311	\$650,936	\$7,485,483
	2036	\$155,600	\$1,728,911	\$511,464	\$7,996,947
	2037	\$155,600	\$1,884,511	\$371,991	\$8,368,938
	2038	\$155,600	\$2,040,111	\$232,518	\$8,601,456
Maintain Viable Presence (5 Years)	2039	\$330,620	\$2,370,730	\$0	\$8,601,456
	2040	\$330,503	\$2,701,233	\$0	\$8,601,456
	2041	\$330,386	\$3,031,619	\$0	\$8,601,456
	2042	\$330,270	\$3,361,889	\$0	\$8,601,456
	2043	\$330,153	\$3,692,042	\$0	\$8,601,456
Additional Years as Required by 313.026(c)(1) (10 Years)	2044	\$330,036	\$4,022,078	\$0	\$8,601,456
	2045	\$329,919	\$4,351,997	\$0	\$8,601,456
	2046	\$329,803	\$4,681,800	\$0	\$8,601,456
	2047	\$329,686	\$5,011,486	\$0	\$8,601,456
	2048	\$329,569	\$5,341,055	\$0	\$8,601,456
	2049	\$329,453	\$5,670,508	\$0	\$8,601,456
	2050	\$329,336	\$5,999,844	\$0	\$8,601,456
	2051	\$329,219	\$6,329,063	\$0	\$8,601,456
	2052	\$329,103	\$6,658,165	\$0	\$8,601,456
	2053	\$328,986	\$6,987,151	\$0	\$8,601,456

\$6,987,151	is less than	\$8,601,456
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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
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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, Lumberton PV I, LLC

Year	Employment			Personal Income			Revenue & Expenditure		
	Direct	Indirect + Induced	Total	Direct	Indirect + Induced	Total	Revenue	Expenditure	Net Tax Effect
2025	200	200	400	\$8,000,000	\$20,560,000	\$28,560,000	1470000	-740000	\$2,210,000
2026	200	425	625	\$8,000,000	\$41,800,000	\$49,800,000	3460000	-890000	\$4,350,000
2027	200	597	797	\$8,000,000	\$60,850,000	\$68,850,000	4970000	-790000	\$5,760,000
2028	200	183	383	\$8,000,000	\$31,060,000	\$39,060,000	1570000	520000	\$1,050,000
2029	2	(0)	2	\$100,813	\$9,669,187	\$9,770,000	450000	1420000	-\$970,000
2030	2	(29)	-27	\$100,813	\$4,049,187	\$4,150,000	250000	1330000	-\$1,080,000
2031	2	(47)	-45	\$100,813	\$389,187	\$490,000	100000	1170000	-\$1,070,000
2032	2	(49)	-47	\$100,813	-\$2,300,813	-\$2,200,000	50000	1030000	-\$980,000
2033	2	(49)	-47	\$100,813	-\$3,270,813	-\$3,170,000	30000	850000	-\$820,000
2034	2	(43)	-41	\$100,813	-\$3,270,813	-\$3,170,000	20000	720000	-\$700,000
2035	2	(35)	-33	\$100,813	-\$3,520,813	-\$3,420,000	20000	580000	-\$560,000
2036	2	(25)	-23	\$100,813	-\$2,790,813	-\$2,690,000	20000	470000	-\$450,000
2037	2	(22)	-20	\$100,813	-\$2,300,813	-\$2,200,000	0	370000	-\$370,000
2038	2	(18)	-16	\$100,813	-\$2,300,813	-\$2,200,000	-20000	300000	-\$320,000
2039	2	(10)	-8	\$100,813	-\$830,813	-\$730,000	0	210000	-\$210,000
2040	2	(6)	-4	\$100,813	-\$830,813	-\$730,000	-20000	110000	-\$130,000
2041	2	(0)	2	\$100,813	-\$1,080,813	-\$980,000	-30000	50000	-\$80,000
2042	2	(0)	2	\$100,813	-\$340,813	-\$240,000	-30000	20000	-\$50,000
2043	2	(2)	0	\$100,813	-\$100,813	\$0	0	-20000	\$20,000
2044	2	(2)	0	\$100,813	\$389,187	\$490,000	-20000	-40000	\$20,000
2045	2	(4)	-2	\$100,813	-\$100,813	\$0	-30000	-120000	\$90,000
2046	2	(4)	-2	\$100,813	\$389,187	\$490,000	50000	-140000	\$190,000
2047	2	(0)	2	\$100,813	\$879,187	\$980,000	80000	-170000	\$250,000
2048	2	2	4	\$100,813	\$879,187	\$980,000	60000	-210000	\$270,000
2049	2	(0)	2	\$100,813	\$389,187	\$490,000	90000	-230000	\$320,000
2050	2	(0)	2	\$100,813	\$1,849,187	\$1,950,000	110000	-270000	\$380,000
2051	2	2	4	\$100,813	\$1,359,187	\$1,460,000	110000	-310000	\$420,000
2052	2	(6)	-4	\$100,813	\$1,359,187	\$1,460,000	60000	-280000	\$340,000
2053	2	(6)	-4	\$100,813	\$389,187	\$490,000	80000	-340000	\$420,000
						Total	\$12,900,000	\$4,600,000	\$8,300,000
							\$15,287,151	is greater than	\$8,601,456

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.