



PROJECT FUNDING REQUEST

BOARD DATE: May 9, 2024

Team Manager: Joe Koen

ACTION REQUESTED

Consider approving by resolution a request from Greater Texoma Utility Authority on behalf of Arledge Ridge Water Supply Corporation for \$2,880,000 in financial assistance from the Texas Water Development Fund for planning, design, and construction of a water system improvement project.

STAFF RECOMMENDATION

Approve No Action

BACKGROUND

The Greater Texoma Utility Authority (Authority) provides its member cities with assistance in financing and construction of water and wastewater facilities. The Authority may also be requested to provide operations services for water and wastewater facilities by member cities and others.

The Arledge Ridge Water Supply Corporation (Corporation) is a member-owned, non-profit corporation. The Corporation services 662 connections.

PROJECT NEED AND DESCRIPTION

The Corporation's water distribution system has significant water loss, with the 2020 water loss audit reporting the Corporation to be above its thresholds for both apparent and real water loss. The Corporation's aging water system is undersized and is not adequate to meet projected needs. The Corporation has exceeded the Texas Commission on Environmental Quality's 85 percent pumping capacity requirement.

The Corporation is proposing to replace two booster pumps and add pressure tanks to the system, as well as replacement of water line and meters throughout the system.

PROJECT SCHEDULE

Task	Schedule Date
Closing	September 1, 2024
Engineering Feasibility Report Completion (End of Planning Phase)	October 1, 2024
Design Phase Completion	March 2, 2025
Start of Construction	June 1, 2025
Construction Completion	June 1, 2026

COMMITMENT PERIOD: FOUR (4) MONTHS TO EXPIRE SEPTEMBER 30, 2024

KEY ISSUES

The Corporation is above its real and apparent water loss threshold, this project will address the Corporation's water loss issues.

LEGAL/SPECIAL CONDITIONS

- Adoption of a water conservation plan prior to closing.

Attachments:

1. Financial Review
2. Project Budget
3. Resolution (24-)
4. Water Conservation Review
5. Location Map

Financial Review

GTUA (Arledge Ridge WSC)

Risk Score: 2C

Audit Reviewed: FY 2022

Key Indicators

Indicator	Result	Benchmark
Population Growth, Average Annual 2010-2020	County: 0.50%	State: 1.49%
Top 10 Customers % of Total Revenue	7%	10-15%
Median Household Income as % of State	73%	100%
Days of Cash on Hand (3-year Average)	39 days	30-149 days
Net Fixed Assets/ Annual Depreciation	13 years	12-24 years
Debt Service Coverage Ratio	0.05x	1.0x
Debt-to-Operating Revenues	5.41x	4.00-5.99x
Unemployment Rate (January 2024)	County: 3.20%	State: 4.10%
Working Capital Ratio	1.99	> 1.0
Cash Balance Ratio	6.53%	0-9.99%

Key Risk Score Strengths

- The Corporation's cash on hand are at the benchmark, indicating sufficient reserves for operating expenses.
- The Corporation's working capital ratio of 1.99 exceeds the state benchmark, indicating a strong liquidity position.
- The cash balance has grown from \$28,471 in 2017 to \$64,164 in 2022. With a cash balance ratio of 6.53%, the City demonstrates solid financial health and resilience.

Key Risk Score Concerns

- The household cost factor is above the benchmark; however, the increases have been discussed with the customers in public meetings and further notice will be provided 60 days before the increase is meant to go into effect in June.
- In a no-growth scenario based on 2022 audited figures, the Corporation's total required increase is projected to be \$29.23. However, this does not account for an \$8 rate increase instituted in early 2023. When accounting for this rate increase, the Corporation is projected to need to raise rates by \$11.96 in 2025, \$9.10 in 2026, and an additional \$0.17 in 2027. A rate increase of \$8 was instituted in early 2023 reducing the total projected increase to \$21.23.

PLEDGE

Legal Pledge Name	Contract Revenues
Type of Pledge	<input type="checkbox"/> Tax <input type="checkbox"/> Revenue <input type="checkbox"/> Tax & Revenue <input checked="" type="checkbox"/> Contract <input type="checkbox"/> Other
Revenue Pledge Level	<input checked="" type="checkbox"/> First <input type="checkbox"/> Second <input type="checkbox"/> Third <input type="checkbox"/> N/A

RATES AND CHARGES

Average Residential Use	Gallons/Month	Current Rates	Projected Rates (Year 2027)	Current Household Cost Factor	Projected Household Cost Factor
Water	4,361	\$64.63	\$85.86	2.71	3.48

Responsible Authority	Greater Texoma UA
Program	WDF
Commitment Number	L1001767
Project Number	21834
List Year	2023
Type of Pledge	Contract Revenue Pledge
Pledge Level (if applicable)	First Lien
Legal Description	\$2,880,000 Greater Texoma Utility Authority Taxable Contract Revenue Bonds, Proposed Taxable Series 2024 (Arledge Ridge WSC)
Tax-exempt or Taxable	Taxable
Refinance	No
Outlay Requirement	No
Disbursement Method	Escrow
Outlay Type	Outlay <> Escrow Release
Qualifies as Disadvantaged	No
Financial Managerial & Technical Complete	N/A
Phases Funded	Planning, Design, and Construction
Pre-Design	Yes
Project Consistent with State Water Plan	Yes
Water Conservation Plan	Approvable
Overall Risk Score	2C

PROJECT TEAM

Team Manager	Financial Analyst	Engineering Reviewer	Environmental Reviewer	Attorney
Joe Koen	Rand Zeolla	Joshua Pequeno	Kylie Beard	Marshall Walters

ISSUE BEING EVALUATED
FOR ILLUSTRATION PURPOSES ONLY
GTUA Arledge Ridge WSC

\$2,880,000 Greater Texoma Utility Authority Taxable Contract Revenue Proposed Series 2024 (Arledge Ridge WSC)

Dated Date:	9/1/2024	Source:	WDF
Delivery Date:	9/1/2024	Rate:	5.88%
First Interest:	3/1/2025	IUP Year:	2023
First Principal:	9/1/2025	Case:	Contract Revenue
Last Principal:	9/1/2055	Admin.Fee:	\$0
Fiscal Year End:	09/30	Admin. Fee Payment Date:	N/A
Required Coverage:	1.0		

FISCAL YEAR	PROJECTED NET SYSTEM REVENUES	CURRENT DEBT SERVICE	PRINCIPAL PAYMENT	\$2,880,000 ISSUE		TOTAL PAYMENT	TOTAL DEBT SERVICE	COVERAGE
				INTEREST RATE	INTEREST PAYMENT			
2025	\$165,336	\$0	\$0	-	\$165,336	\$165,336	\$165,336	1.00
2026	235,336	-	70,000	5.24%	165,336	235,336	235,336	1.00
2027	236,668	-	75,000	5.24%	161,668	236,668	236,668	1.00
2028	236,668	-	75,000	5.25%	157,738	232,738	232,738	1.02
2029	236,668	-	80,000	5.25%	153,801	233,801	233,801	1.01
2030	236,668	-	80,000	5.26%	149,601	229,601	229,601	1.03
2031	236,668	-	85,000	5.28%	145,393	230,393	230,393	1.03
2032	236,668	-	85,000	5.32%	140,905	225,905	225,905	1.05
2033	236,668	-	90,000	5.35%	136,383	226,383	226,383	1.05
2034	236,668	-	90,000	5.40%	131,568	221,568	221,568	1.07
2035	236,668	-	95,000	5.50%	126,708	221,708	221,708	1.07
2036	236,668	-	95,000	5.55%	121,483	216,483	216,483	1.09
2037	236,668	-	95,000	5.60%	116,210	211,210	211,210	1.12
2038	236,668	-	95,000	5.65%	110,890	205,890	205,890	1.15
2039	236,668	-	95,000	5.70%	105,523	200,523	200,523	1.18
2040	236,668	-	95,000	5.87%	100,108	195,108	195,108	1.21
2041	236,668	-	95,000	5.87%	94,531	189,531	189,531	1.25
2042	236,668	-	95,000	5.87%	88,955	183,955	183,955	1.29
2043	236,668	-	100,000	5.87%	83,378	183,378	183,378	1.29
2044	236,668	-	100,000	5.87%	77,508	177,508	177,508	1.33
2045	236,668	-	100,000	6.02%	71,638	171,638	171,638	1.38
2046	236,668	-	100,000	6.02%	65,618	165,618	165,618	1.43
2047	236,668	-	100,000	6.02%	59,598	159,598	159,598	1.48
2048	236,668	-	100,000	6.02%	53,578	153,578	153,578	1.54
2049	236,668	-	110,000	6.02%	47,558	157,558	157,558	1.50
2050	236,668	-	110,000	6.02%	40,936	150,936	150,936	1.57
2051	236,668	-	110,000	6.02%	34,314	144,314	144,314	1.64
2052	236,668	-	115,000	6.02%	27,692	142,692	142,692	1.66
2053	236,668	-	115,000	6.02%	20,769	135,769	135,769	1.74
2054	236,668	-	115,000	6.02%	13,846	128,846	128,846	1.84
2055	236,668	-	115,000	6.02%	6,923	121,923	121,923	1.94
		\$0	\$2,880,000		\$2,975,488	\$5,855,488	\$5,855,488	

AVERAGE (MATURITY) LIFE	17.57 YEARS
NET INTEREST RATE	5.880%
AVERAGE ANNUAL REQUIREMENT	\$188,887

Disclaimer: This is a working document and is provided as a courtesy. All information contained herein, including the proposed interest rate, is subject to change upon further review of the TWDB in accordance with 31 Texas Administrative Code Chapters 363, 371, 375, or 384, as applicable. The TWDB does not function as a financial advisor to anyone in connection with this financing. The information contained in this document is used by TWDB staff to analyze the application for financing is illustrative only and does not constitute any guaranty of future rates. The TWDB makes no claim regarding the applicability of the information at closing, at which time actual rates will be set.



Project Budget Summary

Attachment 2

Greater Texoma UA

21834 - GTUA/Arledge Ridge WSC

Budget Items	TWDB Funds	Total
Construction		
Construction	\$2,033,925.00	\$2,033,925.00
Subtotal for Construction	\$2,033,925.00	\$2,033,925.00
Basic Engineering Services		
Construction Engineering	\$50,000.00	\$50,000.00
Design	\$173,722.00	\$173,722.00
Planning	\$40,000.00	\$40,000.00
Subtotal for Basic Engineering Services	\$263,722.00	\$263,722.00
Special Services		
Application	\$8,500.00	\$8,500.00
Environmental	\$25,000.00	\$25,000.00
Geotechnical	\$10,000.00	\$10,000.00
Inspection	\$67,120.00	\$67,120.00
Special Service Other (Archeological Survey)	\$50,000.00	\$50,000.00
Surveying	\$10,000.00	\$10,000.00
Water Conservation Plan	\$2,500.00	\$2,500.00
Subtotal for Special Services	\$173,120.00	\$173,120.00
Fiscal Services		
Bond Counsel	\$23,350.00	\$23,350.00
Bond Reserve Fund	\$136,800.00	\$136,800.00
Financial Advisor	\$18,650.00	\$18,650.00
Fiscal/Legal	\$3,000.00	\$3,000.00
Issuance Costs	\$3,500.00	\$3,500.00
Subtotal for Fiscal Services	\$185,300.00	\$185,300.00
Other		
Administration	\$13,000.00	\$13,000.00
Project Legal Expenses	\$5,880.00	\$5,880.00
Subtotal for Other	\$18,880.00	\$18,880.00
Contingency		
Contingency	\$205,053.00	\$205,053.00
Subtotal for Contingency	\$205,053.00	\$205,053.00
Total	\$2,880,000.00	\$2,880,000.00

A RESOLUTION OF THE TEXAS WATER DEVELOPMENT BOARD
APPROVING AN APPLICATION FOR FINANCIAL ASSISTANCE IN THE AMOUNT OF
\$2,880,000 TO GREATER TEXOMA UTILITY AUTHORITY
FROM THE FINANCIAL ASSISTANCE ACCOUNT OF
THE TEXAS WATER DEVELOPMENT FUND II
THROUGH THE PROPOSED PURCHASE OF
\$2,880,000 GREATER TEXOMA UTILITY AUTHORITY
CONTRACT REVENUE BONDS, PROPOSED TAXABLE SERIES 2024
(ARLEDGE RIDGE WATER SUPPLY CORPORATION PROJECT)

(24-)

Recitals:

The Greater Texoma Utility Authority (Authority), has filed an application for financial assistance in the amount of \$2,880,000 from the Financial Assistance Account of the Texas Water Development Fund II, established by Texas Water Code § 17.959, to finance water system improvements, identified as Project No. 21834.

The Authority seeks financial assistance from the Texas Water Development Board (TWDB) in the amount of \$2,880,000 through the TWDB's purchase of \$2,880,000 Greater Texoma Utility Authority Contract Revenue Bonds, Proposed Taxable Series 2024 (Arledge Ridge Water Supply Corporation Project) (together with all authorizing documents (Obligations)), all as is more specifically set forth in the application and in recommendations of the TWDB's staff.

The Authority has offered a pledge of contract revenue as sufficient security for the repayment of the Obligations.

The commitment is approved for funding under the TWDB's pre-design funding option, and initial and future releases of funds are subject to 31 TAC § 363.16.

In accordance with Texas Water Code § 17.124, the TWDB has considered all matters required by law and in particular the following:

1. the needs of the area to be served by the water supply project, the benefit of the water supply project to the area, the relationship of the water supply project to the overall, statewide water needs, and the relationship of the water supply project to the approved regional and state water plans; and
2. the availability of revenue to the Authority, from all sources, for the ultimate repayment of the cost of the water supply project, including interest.

Findings:

1. The public interest requires state assistance in the water supply project, in accordance with Texas Water Code § 17.125(a)(1).
2. In its opinion the tax or revenue pledged by the Authority will be sufficient to meet all the Obligations assumed by the Authority during the succeeding period of not more than 50 years, in accordance with Texas Water Code § 17.125(a)(2).
3. The Authority, a wholesale supplier of water, has adopted a resolution affirming that it will coordinate with its retail providers to implement a water conservation program that will result in the more efficient use of water, that will meet reasonably anticipated local needs and conditions and that will incorporate those practices, techniques, or technologies prescribed by the Texas Water Code and TWDB's rules.
4. The application and financial assistance requested meet the requirements of Chapter 17, Subchapters D, E, and L, Water Code, and the TWDB's rules set forth in 31 TAC Chapter 363, Subchapter A.
5. The TWDB has approved a regional water plan for the region of the state that includes the area benefiting from the project and the needs to be addressed by the project will be addressed in a manner that is consistent with the approved regional and state water plans, as required by Texas Water Code § 16.053(j).
6. The current water audit required by Texas Water Code § 16.0121 has been completed by the Arledge Ridge Water Supply Corporation (WSC) and filed with the TWDB, in accordance with Texas Water Code § 16.053(j).

NOW THEREFORE, based on these findings, the TWDB resolves:

A commitment is made by the TWDB to the Greater Texoma Utility Authority for financial assistance in the amount of \$2,880,000 from the Financial Assistance Account of the Texas Water Development Fund II, to be evidenced by the TWDB's purchase of \$2,880,000 Greater Texoma Utility Authority Contract Revenue Bonds, Proposed Taxable Series 2024 (Arledge Ridge Water Supply Corporation Project). This commitment will expire on September 30, 2024.

This commitment is conditioned as follows:

Standard Conditions:

1. This commitment is contingent on a future sale of bonds by the TWDB or on the availability of funds on hand as determined by the TWDB.

2. This commitment is contingent upon the issuance of a written approving opinion of the Attorney General of the State of Texas stating that the Authority complied with all of the requirements of the laws under which the Obligations were issued; that the Obligations were issued in conformance with the Constitution and laws of the State of Texas; and that the Obligations are valid and binding obligations of the Authority.
3. This commitment is contingent upon the Authority's compliance with all applicable laws, rules, policies, and guidance (as these may be amended from time to time to adapt to a change in law, in circumstances, or any other legal requirement), including but not limited to 31 TAC Chapter 363.
4. The Obligations must provide that the Obligations can be called for early redemption only in inverse order of maturity, and on any date beginning on or after the first interest payment date that is 10 years from the dated date of the Obligations, at a redemption price of par, together with accrued interest to the date fixed for redemption.
5. The Obligations must provide that the Authority, or an obligated person for whom financial or operating data is presented to the TWDB in the application for financial assistance either individually or in combination with other issuers of the Authority's Obligations or obligated persons, will, at a minimum, covenant to comply with requirements for continuing disclosure on an ongoing basis substantially in the manner required by Securities and Exchange Commission (SEC) in 17 CFR § 240.15c2-12 (Rule 15c2-12) and determined as if the TWDB were a Participating Underwriter within the meaning of such rule, such continuing disclosure undertaking being for the benefit of the TWDB and the beneficial owners of the Authority's Obligations, if the TWDB sells or otherwise transfers such Obligations, and the beneficial owners of the TWDB's bonds if the Authority is an obligated person with respect to the bonds under SEC Rule 15c2-12.
6. The Obligations must require the Authority to use any surplus financial assistance proceeds from the Obligations remaining after completion of a final accounting in a manner approved by the Executive Administrator.
7. The Obligations must provide that the TWDB may exercise all remedies available to it in law or equity, and any provision of the Obligations that restricts or limits the TWDB's full exercise of these remedies will be of no force and effect.
8. Financial assistance proceeds are public funds. Therefore, the Obligations must require that these proceeds be held at a designated state depository institution or other properly chartered and authorized institution in accordance with the Public

Funds Investment Act, Government Code, Chapter 2256 and the Public Funds Collateral Act, Government Code, Chapter 2257.

9. Proceeds of this commitment must not be used by the Authority when sampling, testing, removing, or disposing of contaminated soils or media at the project site. The Obligations must provide that the Authority is solely responsible for liability resulting from acts or omissions of the Authority, its employees, contractors, or agents arising from the sampling, analysis, transport, storage, treatment, recycling, and disposition of any contaminated sewage sludge, contaminated sediments or contaminated media that may be generated by the Authority, its contractors, consultants, agents, officials, and employees as a result of activities relating to the Project to the extent permitted by law.
10. Before closing, the Authority must submit documentation evidencing the adoption and implementation of sufficient system rates and charges or, if applicable, the levy of an interest and sinking tax rate sufficient for the repayment of all system debt service requirements.
11. Before closing, and if required under the TWDB's financial assistance program and not previously provided with the application, the Authority must submit an executed engineering contract as appropriate for the project scope of work, and an executed financial advisor contract and executed bond counsel contract as appropriate for the work to be performed in obtaining the TWDB's financial assistance for the project, in a form and substance satisfactory to the Executive Administrator. Fees to be reimbursed under any consulting contract must be reasonable in relation to the services performed, must be reflected in the contract, and must be acceptable to the Executive Administrator.
12. Before closing, when any portion of financial assistance proceeds are to be held in escrow or in trust, the Authority must execute an escrow agreement or trust agreement, approved as to form and substance by the Executive Administrator, and must submit that executed agreement to the TWDB.
13. The Executive Administrator may require that the Authority execute a separate financing agreement in form and substance acceptable to the Executive Administrator.
14. The Authority must abide by all applicable construction contract requirements related to the use of iron and steel products produced in the United States, as required by Texas Government Code, Chapter 2252, Subchapter F and Texas Water Code § 17.183.

15. The Authority must immediately notify TWDB, in writing, of any suit against it by the Attorney General of Texas under Texas Penal Code § 1.10(f) (related to federal laws regulating firearms, firearm accessories, and firearm ammunition).

Pledge Conditions:

16. Upon request by the Executive Administrator, the Authority must submit annual audits of contracting parties for the Executive Administrator's review.
17. The Obligations must require the Authority to maintain and enforce the contracts with its customers so that the revenues paid to the Authority by its customers are sufficient to meet the revenue requirements of the Authority's obligations arising from the operation of the water and sewer system.
18. The Obligations must provide that the pledged contract revenues from the Authority will not be pledged to the payment of any additional parity obligations of the Authority secured by a pledge of the same contract revenues unless the Authority demonstrates to the Executive Administrator's satisfaction that the pledged contract revenues will be sufficient for the repayment of all Obligations and additional parity obligations.
19. Before closing, the Authority must submit executed contracts between the Authority and the contracting parties regarding the contract revenues pledged to the payment of the Authority's Obligations, in form and substance acceptable to the Executive Administrator. The contracts must include provisions consistent with the provisions of this Resolution regarding the contracting parties' annual audits, the setting of rates and charges, and collection of revenues sufficient to meet the Authority's debt service obligations and additional parity obligations.

Special Conditions:

20. Before closing: (a) the Authority must ensure that the WSC has adopted and implemented the water conservation program approved by the TWDB; and (b) the Authority must include in its contract with the Contracting Parties a requirement that the Contracting Parties adopt a water conservation plan that complies with TWDB rules and is approved by the Authority. If this requirement is to be included in an existing water or wastewater service contract, it may be included at the earliest of the renewal or substantial amendment of that contract, or by other appropriate measures.

APPROVED and ordered of record this, the 9th day of May 2024.

TEXAS WATER DEVELOPMENT BOARD

Brooke T. Paup, Chairwoman

DATE SIGNED: _____

ATTEST:

Bryan McMath, Interim Executive Administrator

Review Date:

Project ID:

Water

Wastewater

Other

WATER CONSERVATION REVIEW

Entity:

Other entity:

WATER CONSERVATION PLAN DATE:**Approvable****Adopted**

	Total GPCD	Residential GPCD	Water Loss GPCD
Baseline			
5-year Goal			
10-year Goal			

WATER LOSS AUDIT YEAR:

Service connections:

Length of main lines (miles):

Water Loss GCD:

Retail population:

Connections per mile:

Water Loss GPCD:

ILI:

Real Loss GMD:

WATER LOSS THRESHOLDS

Water Loss Project:

Waiver Requested:

Wholesale Adjusted:

Apparent Loss GCD

Real Loss GCD

Threshold Type:

Reported

Threshold

Reported

Threshold

Does the applicant meet Water Loss Threshold Requirements?

Yes**No****NA****ADDITIONAL INFORMATION****STAFF NOTES AND RECOMMENDATIONS**

DEFINITIONS

Adopted refers to a water conservation plan that meets the minimum requirements of the water conservation plan rules and has been formally approved and adopted by the applicant's governing body.

Apparent losses are paper losses that occur when the water reaches a customer, but the volume is not accurately measured and/or recorded due to unauthorized consumption, customer meter inaccuracy, or billing system and collection data errors.

Approvable refers to a water conservation plan that substantially meets the minimum requirements of the water conservation plan rules but has not yet been adopted by the applicant's governing body.

Best Management Practices are voluntary efficiency measures that save a quantifiable amount of water, either directly or indirectly, and that can be implemented within a specific time frame.

GPCD means gallons per capita per day.

GCD means gallons per connection per day.

GMD means gallons per mile per day.

Infrastructure Leakage Index (ILI) is the current annual real loss divided by the unavoidable annual real loss (theoretical minimum real loss) and only applies to utilities with more than 3,000 connections and a connection density of more than 16 connections per mile. The **ILI** is recommended to be less than 3 if water resources are greatly limited and difficult to develop, between 3 and 5 if water resources are adequate to meet long-term needs but water conservation is included in long-term water planning, and between 5 and 8 if water resources are plentiful, reliable, and easily extracted. The **ILI** is recommended as a bench marking tool, but until there is increased data validity of the variables used in the calculation, the **ILI** should be viewed with care.

NA means not applicable.

Real losses are the physical losses, largely leakage, from the infrastructure: mains, valves, and storage tank overflows. Real loss constitutes background leakage (unreported and difficult to detect), unreported leakage (leaks that do not surface but could be detected), and reported leakage (leaks that often surface and those that are detected by the utility through leak detection).

Residential GPCD is the amount of residential water use (single and multi-family customer use) divided by the residential population divided by 365.

Total GPCD is the amount of total system input volume divided by the retail population divided by 365.

Total water loss is the sum of the apparent and real water losses.

Water loss is the difference between the input volume and the authorized consumption within a water system. Water Loss consists of real losses and apparent losses.

Water Loss GPCD is the amount of water loss divided by the retail population divided by 365.

Water Loss per Connection per Day Calculated as the water loss volume divided by the number service connections divided by 365. This indicator allows for reliable performance tracking in the water utility's efforts to reduce water losses. It replaces water loss percentage.

Water Loss Thresholds are levels of real and apparent water loss determined by the connection density of a retail public utility, at or above which a utility receiving financial assistance from the Texas Water Development Board must use a portion of that financial assistance to mitigate the utility's system water loss.

Wholesale Adjusted represents that some utilities provide large volumes of wholesale water to other providers that travel through the general distribution system, so a calculation has been established to adjust for that volume of wholesale water. These adjustments are only applicable for use in determining whether a utility meets or exceeds water loss thresholds in review of their application for financial assistance. These adjustments should not be used for performance tracking or benchmarking.



GTUA Arledge Ridge WSC Grayson County

