

6/28/2015

My proposed changes/additions to the *State Assessment Manual* (SBE Letter to Assessors No. 2015/030) are as follows:

Page 13, line 33. After this paragraph there should be a sentence discussing the California Supreme Court's interpretation of the language in Section 110(e) from the *Elk Hills Power* case: For example: "This provision means that the appraiser assumes intangible assets and rights are in use as part of a going concern, but the value of those intangibles are not to be included in the final value of the taxable property. *Elk Hills Power, LLC v. Board of Equalization* (2013) 57 Cal.4th 593 at _____."

Page 16, line 6. After sentence ending with "proper appraisal unit." insert this footnote: "For example, an appraisal of a complex industrial facility, mixed-use development, or other locally-assessed property consisting of different types of property (including possibly intangible assets and rights) also requires determination of the proper appraisal unit."

Thank you.

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