

1-1 By: Parker S.B. No. 2063  
1-2 (In the Senate - Filed March 7, 2025; March 24, 2025, read  
1-3 first time and referred to Committee on Local Government;  
1-4 May 8, 2025, reported adversely, with favorable Committee  
1-5 Substitute by the following vote: Yeas 5, Nays 1; May 8, 2025, sent  
1-6 to printer.)

1-7	COMMITTEE VOTE				
1-8		Yea	Nay	Absent	PNV
1-9	Bettencourt	X			
1-10	Middleton	X			
1-11	Cook		X		
1-12	Gutierrez	X			
1-13	Nichols	X			
1-14	Paxton	X			
1-15	West			X	

1-16 COMMITTEE SUBSTITUTE FOR S.B. No. 2063 By: Middleton

1-17 A BILL TO BE ENTITLED  
1-18 AN ACT

1-19 relating to ad valorem tax protests and appeals on the ground of the  
1-20 unequal appraisal of property.

1-21 BE IT ENACTED BY THE LEGISLATURE OF THE STATE OF TEXAS:

1-22 SECTION 1. Section 41.43, Tax Code, is amended by adding  
1-23 Subsection (b-1) to read as follows:

1-24 (b-1) For the purpose of establishing whether a protest  
1-25 shall be determined in favor of the protesting party under  
1-26 Subsection (b)(3), the parties may not present and the appraisal  
1-27 review board may not consider the market value of the property  
1-28 subject to the protest as evidence if the property owner is  
1-29 protesting solely on the ground of unequal appraisal.

1-30 SECTION 2. Section 42.26, Tax Code, is amended by adding  
1-31 Subsection (a-1) to read as follows:

1-32 (a-1) For the purpose of establishing whether a property  
1-33 owner is entitled to relief under Subsection (a)(3), the parties  
1-34 may not present and the court may not consider the market value of  
1-35 the property subject to the suit as evidence if the property owner  
1-36 is appealing solely on the ground of unequal appraisal.

1-37 SECTION 3. Section 42.26(d), Tax Code, as effective until  
1-38 January 1, 2027, is amended to read as follows:

1-39 (d) For purposes of this section and subject to Subsection  
1-40 (a-1), the value of the property subject to the suit and the value  
1-41 of a comparable property or sample property that is used for  
1-42 comparison must be the market value determined by the appraisal  
1-43 district when the property is subject to the limitation on  
1-44 appraised value imposed by Section 23.23 or 23.231.

1-45 SECTION 4. Section 42.26(d), Tax Code, as effective January  
1-46 1, 2027, is amended to read as follows:

1-47 (d) For purposes of this section and subject to Subsection  
1-48 (a-1), the value of the property subject to the suit and the value  
1-49 of a comparable property or sample property that is used for  
1-50 comparison must be the market value determined by the appraisal  
1-51 district when the property is a residence homestead subject to the  
1-52 limitation on appraised value imposed by Section 23.23.

1-53 SECTION 5. Section 41.43(b-1), Tax Code, as added by this  
1-54 Act, applies only to a protest under Chapter 41, Tax Code, for which  
1-55 a notice of protest is filed on or after the effective date of this  
1-56 Act. A protest under Chapter 41, Tax Code, for which a notice of  
1-57 protest was filed before the effective date of this Act is governed  
1-58 by the law in effect when the notice of protest was filed, and the  
1-59 former law is continued in effect for that purpose.

1-60 SECTION 6. Section 42.26(a-1), Tax Code, as added by this

2-1 Act, applies only to an appeal filed under Chapter 42, Tax Code, on  
2-2 or after the effective date of this Act. An appeal filed under  
2-3 Chapter 42, Tax Code, before the effective date of this Act is  
2-4 governed by the law in effect when the appeal was filed, and the  
2-5 former law is continued in effect for that purpose.

2-6 SECTION 7. This Act takes effect January 1, 2026.

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