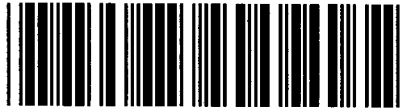




Control Number: 43535



Item Number: 26

Addendum StartPage: 0

House Bill (HB) 1600 and Senate Bill (SB) 567 83<sup>rd</sup>  
Legislature, Regular Session, transferred the functions  
relating to the economic regulation of water and sewer  
utilities from the TCEQ to the PUC effective  
September 1, 2014.

43535

# RM&R

RUSSELL, MOORMAN & RODRIGUEZ, L.L.P.  
ATTORNEYS AT LAW

RECEIVED

TEXAS HERITAGE PLAZA · 102 WEST MORROW STREET, SUITE 105  
2004 OCT 13 PM 2:10

GEORGETOWN, TEXAS 78626

PHONE (512) 930-1317 · FAX (512) 864-7744

PUBLIC UTILITY COMMISSION  
FILING CLERK

December 29<sup>29</sup>, 2003

Via Hand Delivery

Ms. Tammy Holguin-Benter  
Utilities and Districts Section (MC-153)  
Water Supply Division  
Texas Commission on Environmental Quality  
P.O. Box 13087 (MC-153)  
Austin, Texas 78711-3087

2003 0737 UCR

Re: Application from the City of Royse City to Obtain a Sewer Certificate of Convenience and Necessity (CCN) No. 12827 in Rockwall, Collin and Hunt Counties; Application No. 34277-C

Dear Ms. Holguin-Benter:

This is in response to your telephone call of Friday, December 19, 2003 requesting a corrected Publisher's Affidavit on the above referenced application of the City of Royse City. Please find an original and three (3) copies of same enclosed.

Thank you for your help and assistance in this matter.

Sincerely,



Tanza L. Smith  
Assistant to Kerry Russell

Enclosures: Corrected Publisher's Affidavit

RECEIVED  
DEC 29 2003  
TCEQ  
PLANS REVIEW LOG NO.

2



**Texas Commission on Environmental Quality**

APPLICATION NO. 34277-C

PUBLISHER'S AFFIDAVIT

STATE OF TEXAS

COUNTY OF HUNT

Before me the undersigned authority, on this day personally appeared CHRIS VOCCIO, who being by me duly sworn, deposes and says that he is the PUBLISHER of the HERALD-BANNER; that said newspaper is regularly published in HUNT County and generally circulated in HUNT, ROCKWALL and COLLIN Counties, Texas; and that the attached notice was published in said newspaper on the following date(s), to wit: JUNE 18, 2003 and JUNE 25, 2003

A handwritten signature in black ink, appearing to be "C. Voccio", written over a horizontal line.

Newspaper Representative's Signature

Subscribed and sworn to before me this 22 day of Dec, 2003, to certify which witness my hand and seal of office.

A handwritten signature in black ink, appearing to be "Mary Standfield", written over a horizontal line.

Notary Public in and for the State of Texas



The printed name "Mary Standfield" written in a cursive font over a horizontal line.

Print or Type Name of Notary Public

Commission Expires 1-16-04

**Trucks-Domestic**

**ERDO**  
2001 Regular Cab.  
V6, \$4,995.

**GREENVILLE**  
FORD LINCOLN MERCURY  
**866-887-6580**

**FORD RANGER XLT**  
2001. Red, supercab,  
automatic, all power,  
alloy wheels. \$10988.

**GREENVILLE**  
FORD LINCOLN MERCURY  
**866-887-6580**

**Vans**

**MAZDA PROTAGE**  
1996. Nice van, great  
vehicle, great price.  
st#2293B, \$4,795.

**ALAN NEUBER**  
903-450-4218


**NISSAN**  
1997 Quest. 142K  
miles All power/ Rear  
AC. Good condition  
\$4,950 903-450-1775

**PLYMOUTH**  
1992 Voyager. Cold  
Air. Perfect for the  
kids!! \$750 down,  
\$60 per week.

**Harrison Auto Sales**  
903-662-9088



**General Notices**



"All real estate advertised herein is subject to the Federal Fair Housing Act, which makes it illegal to advertise any preference, limitation, or discrimination."  
"We will not knowingly accept any advertising for real estate which is in violation of the law. All persons are hereby informed that all dwellings advertised are available on an equal opportunity basis."

**General Notices**

**ROYSE CITY ISD** is currently taking sealed proposals for: **SCHOOL BUSES**. Deadline for proposals is Tuesday, July 8, 2003 at 2:00pm. Proposals should be sealed and marked "Sealed Proposal # 03-04-01". Proposals should be mailed or hand delivered to: Angel Norris-Royse City ISD, 115 East I-30, Royse City, TX 75189. For a copy of detailed specs., please call Angel Norris @ 972-636-2413.

**General Notices**

**ROYSE CITY ISD** is currently taking sealed proposals for: **ATHLETIC SUPPLIES**. Deadline for proposals is Tuesday, July 8, 2003 at 3:00pm. Proposals should be sealed and marked "Sealed Proposal #03-04-02". Proposals should be mailed or hand delivered to: Angel Norris-Royse City ISD, 115 East I-30, Royse City, TX 75189. For a copy of detailed specs. Please call Angel Norris @ 972-636-2413.

**BE SURE TO CHECK YOUR AD**

6/18/03

**NOTICE for PUBLICATION**  
**NOTICE OF APPLICATION OF THE CITY OF ROYSE CITY TO OBTAIN A CERTIFICATE OF CONVENIENCE AND NECESSITY (CCN) TO PROVIDE SEWER UTILITY SERVICE IN ROCKWALL, COLLIN and HUNT COUNTIES**

The City of Royse City has filed an application with the Texas Commission on Environmental Quality to provide sewer utility service in Rockwall, Collin and Hunt Counties.

The proposed sewer utility service area is located within the City of Royse City, Texas and it's ETJ, and is generally bounded on the north by CR 1031 and CR 2652 and the northernmost boundaries of the City of Royse City ETJ; on the east by Hunt County line and those portions of the City of Royse City ETJ that extend from 1' to 4,500' beyond the Hunt County line; on the south by the City of Fate (CCN No. 20856), Crenshaw Road and points from 1' to 1 mile south of Crenshaw Road; and on the west by the City of Fate (CCN No. 20856) and the western boundaries of the City of Royse City ETJ.

The total area being requested includes approximately 15,360 acres and 1,200 current customers.

A copy of the proposed service area map is available at the **City Hall of Royse City, 100 West Main Street, Royse City, Texas 75189.**

A request for a public hearing must be in writing. You must state (1) your name, mailing address, and daytime telephone number, (2) the applicant's name, application number or another recognizable reference to this application; (3) the statement, "I/we request a public hearing"; (4) a brief description of how you or the persons you represent, would be adversely affected by the granting of the application for a CCN; and (5) your proposed adjustment to the application or CCN which would satisfy your concerns and cause you to withdraw your request for a hearing.

Persons who wish to intervene or comment should write the:

Texas Commission on Environmental Quality  
Water Permits and Resource Management Division  
Utilities and Districts Section, MC-153  
P.O. Box 13087  
Austin, TX 78711-3087

within thirty (30) days from the date of this publication or notice. A public hearing will be held only if a legally sufficient hearing request is received or if the Commission on its own motion requests a hearing. Only those individuals who submit a written hearing request or a written request to be notified if a hearing is set will receive notice if a hearing is scheduled.

If a public hearing is requested, the Executive Director will not issue the CCN and will forward the application to the State Office of Administrative Hearings (SOAH) for a hearing. If no settlement is reached and an evidentiary hearing is held, the SOAH will submit a recommendation to the Commission for final decision. If an evidentiary hearing is held, it will be a legal proceeding similar to a civil trial in state district court.

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**Domestic**

**CHEVY**  
4 wheel drive,  
cab  
miles,  
903-455-2859

**F150**  
Extended cab  
Automatic, all  
\$9995

**ENVILLE**  
LINCOLN MERCURY  
**887-6580**

**ORD F150**  
Regular cab,  
le. Must see!

**ENVILLE**  
LINCOLN MERCURY  
**887-6580**

**ORD F250**  
Extended cab,  
atic, V8, all  
\$12,550

**ENVILLE**  
LINCOLN MERCURY  
**887-6580**

**RD RANGER**  
Extended Cab,  
automatic, all  
\$8995

**ENVILLE**  
LINCOLN MERCURY  
**887-6580**

**GMC**  
3/4 ton, 350  
Power steer-  
ing brakes, air,  
903-527-3704

**Vans**

**FORD WINDSTAR**  
2002 Van. All power,  
like new. \$13,995

**GREENVILLE**  
FORD LINCOLN MERCURY  
**866-887-6580**

**14**  
**LEGAL**  
**NOTICES**

**General Notices**



"All real estate advertised herein is subject to the Federal Fair Housing Act, which makes it illegal to advertise any preference, limitation, or discrimination."

"We will not knowingly accept any advertising for real estate which is in violation of the law. All persons are hereby informed that all dwellings advertised are available on an equal opportunity basis."

**General Notices**

**GREENVILLE**  
**FENIX CONSTRUCTORS, INC.** is seeking HUB certified subcontractors/vendors to bid on the AREA ENGINEERING and MAINTENANCE FACILITY being constructed in Greenville, Texas. To be HUB certified, your company must be certified by the General Services Commission. Fenix Constructors is seeking HUB certified subcontractors to bid on the following sections: Earthwork, Concrete, Masonry, Metals, Carpentry, Thermal and Moisture Protection, Doors and Windows, All Finishes, Specialties, Hvac, and Plumbing. If your company is certified and you wish

**CLASSIFIEDS**  
**SELL!!**

**General Notices**

to turn a bid in on a particular section, please fax your company name, address, phone number and HUB certification number to 903-588-2789. to obtain drawings for bid review, call 580-223-4313 and ask for Tony Radican. Fenix Constructors, Inc. is an Equal Opportunity Employer.

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**Check**  
**Your**  
**Ad!**

**E**  
**ING BEFORE**  
**AND ZONING**  
**CITY, CITY**  
**TEXAS.**  
  
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**NOTICE for PUBLICATION**  
**NOTICE OF APPLICATION OF THE CITY OF ROYSE CITY TO OBTAIN A**  
**CERTIFICATE OF CONVENIENCE AND NECESSITY (CCN)**  
**TO PROVIDE SEWER UTILITY SERVICE IN**  
**ROCKWALL, COLLIN and HUNT COUNTIES**

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Texas Commission on Environmental Quality  
Water Permits and Resource Management Division  
Utilities and Districts Section, MC-153  
P.O. Box 13087  
Austin, TX 78711-3087

within thirty (30) days from the date of this publication or notice. A public hearing will be held only if a legally sufficient hearing request is received or if the Commission on its own motion requests a hearing. Only those individuals who submit a written hearing request or a written request to be notified if a hearing is set will receive notice if a hearing is scheduled.

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# RM&R

RUSSELL, MOORMAN & RODRIGUEZ, L.L.P.  
ATTORNEYS AT LAW

TEXAS HERITAGE PLAZA · 102 WEST MORROW STREET, SUITE 103  
GEORGETOWN TEXAS 78626  
PHONE (512) 930-1317 · FAX (512) 864-7744

December <sup>29</sup>~~23~~, 2003

Via Hand Delivery

Ms. Tammy Holguin-Benter  
Utilities and Districts Section (MC-153)  
Water Supply Division  
Texas Commission on Environmental Quality  
P.O. Box 13087 (MC-153)  
Austin, Texas 78711-3087

2003-0737 UCR

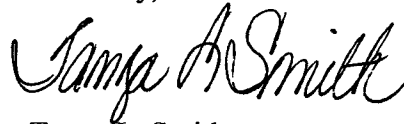
Re: Application from the City of Roysse City to Amend a Water Certificate of Convenience and Necessity (CCN) No. 12827 in Rockwall and Hunt Counties; Application No. 34270-C

Dear Ms. Holguin-Benter:

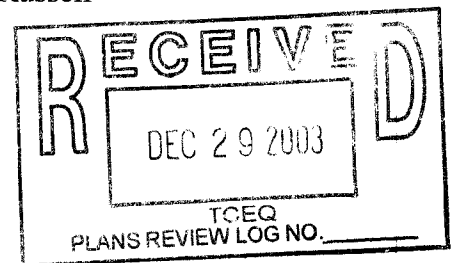
This is in response to your telephone call of Friday, December 19, 2003 requesting a corrected Publisher's Affidavit on the above referenced application of the City of Roysse City. Please find an original and three (3) copies of same enclosed.

Thank you for your help and assistance in this matter.

Sincerely,



Tanza L. Smith  
Assistant to Kerry Russell



Enclosures: Corrected Publisher's Affidavit



Texas Commission on Environmental Quality

APPLICATION NO. 34270-C

PUBLISHER'S AFFIDAVIT

STATE OF TEXAS

COUNTY OF HUNT

Before me the undersigned authority, on this day personally appeared CHRIS VOCCIO, who being by me duly sworn, deposes and says that he is the PUBLISHER of the HERALD-BANNER; that said newspaper is regularly published in HUNT County and generally circulated in HUNT, ROCKWALL and COLLIN Counties, Texas; and that the attached notice was published in said newspaper on the following date(s), to wit: JUNE 11, 2003 and JUNE 18, 2003

[Handwritten Signature]

Newspaper Representative's Signature

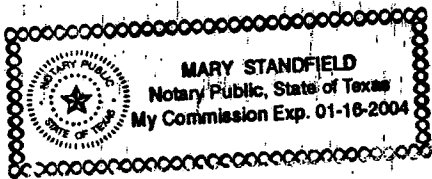
Subscribed and sworn to before me this 22 day of Dec, 2003, to certify which witness my hand and seal of office.

[Handwritten Signature: Mary Standfield]

Notary Public in and for the State of Texas

Mary Standfield

Print or Type Name of Notary Public



Commission Expires 1-16-04

**Sport Utility Vehicles**

**JEEP CHEROKEE**  
1984, Super value. Gr. fixer upper. st#1, \$895.

**ALAN REUBER**  
903-450-4216

**FORD EXPLORER**  
1993. All power, runs and drives great. st#2527A, \$5,995.

**ALAN REUBER**  
903-450-4216

**FORD EXPLORER**  
1996. 2 door, white, automatic, all power, sport trim. \$4,995.

**GREENVILLE**  
FORD LINCOLN MERCURY  
903-455-7222

**ISUZU RODEO**  
1998; 60K miles, Silver, New tires, belts, oil changed every 3,000 miles. Very Nice! 903-994-2312 after 6:00 PM

**CHEVY SUBURBAN**  
1979. Automatic, V8, 9 passenger, seating, st#2478B, \$4,995.

**ALAN REUBER**  
903-450-4216

**CHEVY SUBURBAN**  
1999 4x4, grey, leather, 48K miles loaded very clean \$ 17,995 903-454-1936

**Domestic**

**CHEVROLET**  
1995 SUBURBAN LS, extra clean. \$8800. Call after 4:30pm 903-450-5192.

**CHEVY SILVERADO**  
1998 ZX. Blue with blue interior. Sharp ruck, extra clean. #2144A, \$6,995.

**ALAN REUBER**  
903-450-4216

**NOTICE**

**CITY, TEXAS**  
1. 03-06-341

INDEXING 161.396  
RE OR LESS, SITU-  
ONE SURVEY, AB-  
CKWALL COUNTY,  
SURVEY ABSTRACT  
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y Council June 10,

raft

**Trucks-Domestic**

**DODGE**  
1982 Ram, 108K, \$900. Two owners, runs great. 903-886-3688.

**DODGE RAM 1500**  
2000. Regular cab, swb, V6, automatic, bedliner, alloy wheels. \$6,995

**GREENVILLE**  
FORD LINCOLN MERCURY  
903-455-7222

**DODGE RAM 1500**  
2001. Regular Cab. V6, \$4,995.

**GREENVILLE**  
FORD LINCOLN MERCURY  
903-455-7222

**DODGE RAM**  
1994 Regular Cab. Custom wheels, bed liner. Looks good. st#2841A, \$4,995.

**ALAN REUBER**  
903-450-4216

**FORD**  
1984 F150. 65K. 1 owner \$3200. 972-571-7578.

**FORD F150**  
1995. Like new, auto-  
matic, low miles.  
st#2742A, \$5,995.

**ALAN REUBER**  
903-450-4216

**Trucks-Domestic**

**FORD F150**  
1996 Supercab. Black, all power. Must see! \$5,995

**GREENVILLE**  
FORD LINCOLN MERCURY  
903-455-7222

**FORD F150**  
1998 Supercab XLT. White, V8, automatic, toppler, all power, alloy wheels. \$8,995

**GREENVILLE**  
FORD LINCOLN MERCURY  
903-455-7222

**FORD F150**  
1999. Regular cab, green, runs and looks good, V6. st#2697B, \$5,995.

**ALAN REUBER**  
903-450-4216

**FORD F150**  
2000 Regular Cab XL. Red, automatic, V6, super clean, bedliner. \$8,995

**GREENVILLE**  
FORD LINCOLN MERCURY  
903-455-7222

**FORD F150**  
2000 Regular Cab XL. V6, tilt/cruise, red, extra clean. \$7,995

**GREENVILLE**  
FORD LINCOLN MERCURY  
903-455-7222

**Trucks-Domestic**

**FORD F150**  
2000 Supercab XLT. 4x4, V8, all power, lots of extras, Super clean. \$8,995.

**GREENVILLE**  
FORD LINCOLN MERCURY  
903-455-7222

**FORD F150**  
2000 Supercab. Red, bedliner, all power. \$10,988

**GREENVILLE**  
FORD LINCOLN MERCURY  
903-455-7222

**FORD LARIAT**  
1990. Automatic, XLT, ex-cab, all power. st#2446C, \$5,295.

**ALAN REUBER**  
903-450-4216

**FORD RANGER XLT**  
2000. Tan, supercab, all power, automatic. \$8,995

**GREENVILLE**  
FORD LINCOLN MERCURY  
903-455-7222

**FORD RANGER XLT**  
2001. Red, supercab, automatic, all power, alloy wheels. \$10988.

**GREENVILLE**  
FORD LINCOLN MERCURY  
903-455-7222

**Vans**

**MAZDA PROTAGE**  
1996. Nice van, great vehicle, great price. st#2293B, \$4,795.

**ALAN REUBER**  
903-450-4216

**14**  
LEGAL NOTICES

**General Notices**



"All real estate advertised herein is subject to the Federal Fair Housing Act, which makes it illegal to advertise any preference, limitation, or discrimination."

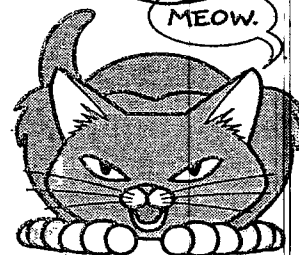
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**General Notices**

**NOTICE OF PUBLIC MEETING ON AGENCY PLAN**  
The Royse City Housing Authority will hold a Public Meeting on Friday June 13, at 10.00 a.m. to receive comments on the Annual Plan for the Royse City Housing Authority. All documents are on display at the office of the Housing Authority. 305 N. Houston St., Monday through Friday, during the hours of 8.00a.m. until 12:00PM.

Call  
972-635-7335

to sell  
your stuff



theclassifieds are the cat's meow.

Area shoppers know theclassifieds are the purr-fect place to find a bargain. In theclassifieds, you can track down deals on everything from collectibles to cuddly kittens. It's easy to place an ad or find the items you want and it's used by hundreds of area shoppers every day.

**HERALD BANNER**  
ROYSE CITY'S WEEKLY NEWSPAPER

Go with your instincts and use theclassifieds today.

**972-635-7335**

**ITEMS UNDER \$25 • ITEMS UNDER \$25**

**FREE AD COUPON**

for Private Party Advertisers

Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
Telephone: \_\_\_\_\_  
Email Address: \_\_\_\_\_  
Ad Copy: \_\_\_\_\_  
\_\_\_\_\_

(must include a price)

Mail to: **theclassifieds**  
2305 King Street  
Greenville, Texas 75401  
or email all of the above information to:  
classifieds@heraldbanner.com  
FREE ads run 3 days.

**ROYSE CITY**  
**HERALD BANNER**  
ROYSE CITY'S WEEKLY NEWSPAPER

**ITEMS UNDER \$25 • ITEMS UNDER \$25**

**PUBLIC NOTICE**  
NOTICE OF APPLICATION FOR CERTIFICATE OF CONVENIENCE AND NECESSITY (CCN) TO PROVIDE WATER UTILITY SERVICE IN ROCKWALL AND HUNT COUNTIES

The City of Royse City has filed an application to amend CCN No. 1282Z with the Texas Commission on Environmental Quality to provide water utility service in Rockwall and Hunt Counties.

The proposed utility service area is located in the southern portion of Royse City, Texas, and is generally bounded on the north and west by I30; on the east by CR 2592; on the south by Parker Creek. The total area being requested includes approximately 4,380 acres and 400 current customers.

A copy of the proposed service area map is available at City Hall of Royse City, 100 West Main Street, Royse City, Texas 75189 972.636-2250.

A request for a public hearing must be in writing. You must state (1) your name, mailing address, and daytime telephone number; (2) the applicant's name, application number or another recognizable reference to this application; (3) the statement, "I/we request a public hearing"; (4) a brief description of how you or the persons you represent, would be adversely affected by the granting of the application for a CCN; and (5) your proposed adjustment to the application or CCN which would satisfy your concerns and cause you to withdraw your request for a hearing.

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Texas Commission on Environmental Quality  
Water Supply Division  
Utilities and Districts Section, MC-153  
P.O. Box 13087  
Austin, TX 78711-3087

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**Autos-Domestic**

**NOVA**  
1988 - Grey. Looks and runs great transportation. st#2631A, \$1,895.

**ALAN REUBER**  
903-450-4218

**PLYMOUTH**  
1991 Voyager. Nice van, great vehicle, great price. st#2829A, \$395.

**ALAN REUBER**  
903-450-4218

**PLYMOUTH**  
1994 Sundance. Light blue, 4 door, heating/AC. Runs great. \$1000, 903-886-6256

**PONTIAC**  
1993 Grand AM. Low miles, cold A/C, mint condition. Will Finance!!

**Harrison Auto Sales**  
903-662-9088

**PONTIAC**  
1995 Grand Prix. Teal green, all power, cold A/C, super clean. st#2569A, \$3,395.

**ALAN REUBER**  
903-450-4218

**PONTIAC**  
2001 Grand AM SE. 2 door, automatic, all power, must see! \$7,988

**GREENVILLE**  
FORD LINCOLN MERCURY  
866-887-6580

**SATURN**  
1995. Great cash car! Drives and looks good, don't miss out! st#2559A, \$3,595.

**ALAN REUBER**  
903-450-4218

**SATURN**  
2002 SL2. 8,200 miles, 4 door. Perfect condition, great buy! \$7,200. 903-447-5168

**Autos-Imports**

**BMW**  
1984, 325E. Good condition \$2,500 903-662-5428

**TOYOTA CAROLLA**  
1988 FX. Dependable 5-speed, nice. \$1500. 903-454-3056

**Motorcycles**

**MOTORCYCLE**  
1977 Harley Davidson Sportster. \$4500 or best offer. 903-348-2370.

**Sport Utility Vehicles**

**FORD**  
1994 Explorer. Good condition. \$3,000. 903-886-8789

**Sport Utility Vehicles**

**PATHFINDER**  
1989. Mint condition, sport, 2 door, cold air. Finance me.

**Harrison Auto Sales**  
903-662-9088

**CHEVROLET**  
1993 Suburban. 4 Wheel Drive, Three Seats, Nice looking Blue with tan interior. Call 903-450-4508.

**CHEVY BLAZER**  
1994 4x4. Automatic. st#2873A, \$3,995.

**ALAN REUBER**  
903-450-4218

**CHEVY BLAZER**  
1994, Good transmission. st#2973, \$1,995

**ALAN REUBER**  
903-450-4218

**CHEVY BLAZER**  
1995. V6, auto, all power, cold A/C, 4 door, maroon. \$4000 903-456-3542

**JEEP CHEROKEE**  
1984, Super value. Great fixer upper, st#2546A, \$895.

**ALAN REUBER**  
903-450-4218

**FORD EXPLORER**  
1993 All power, runs and drives great. st#2527A, \$5,995.

**ALAN REUBER**  
903-450-4218

**FORD EXPLORER**  
1996. 2 door, white, automatic, all power, sport trim. \$4,995.

**GREENVILLE**  
FORD LINCOLN MERCURY  
866-887-6580

**CHEVY SUBURBAN**  
1979. Automatic, V8, 9 passenger, seating. st#2478B, \$4,995.

**ALAN REUBER**  
903-450-4218

**Trucks-Domestic**

**CHEVY SILVERADO**  
1998 ZX. Blue with blue interior. Sharp truck, extra clean. st#2144A, \$6,995.

**ALAN REUBER**  
903-450-4218

**DODGE RAM 1500**  
2000. Regular cab, swb, V6, automatic, bedliner, alloy wheels. \$6,995

**GREENVILLE**  
FORD LINCOLN MERCURY  
866-887-6580

**DODGE RAM**  
1994 Regular Cab. Custom wheels, bed liner. Looks good. st#2841A, \$4,995.

**ALAN REUBER**

**Trucks-Domestic**

**CHEVY EL CAMINO**  
1985. Last year made, very good. \$4000. 903-456-4676/ 903-447-4996

**FORD**  
2001 Lariat Dully, Loaded, Western Hauler bed, diesel, red, one owner. 51,000 miles, \$30,000. 903-662-5111 or 903-662-5566.

**FORD F150**  
1989. \$2700 or better offer. 972-784-6900 or 903-527-3692

**FORD F150**  
1995. Like new, automatic, low miles. st#2742A, \$5,995.

**ALAN REUBER**  
903-450-4218

**FORD F150**  
1996 Supercab. Black, all power. Must see! \$5,995

**GREENVILLE**  
FORD LINCOLN MERCURY  
866-887-6580

**GREENVILLE**  
FORD LINCOLN MERCURY  
866-887-6580

**Trucks-Domestic**

**FORD F150**  
1998 Supercab XLT. White, V8, automatic, topper, all power, alloy wheels. \$8,995

**GREENVILLE**  
FORD LINCOLN MERCURY  
866-887-6580

**FORD F150**  
1999. Regular cab, green, runs and looks good. V6. st#2697B, \$5,995.

**ALAN REUBER**  
903-450-4218

**FORD F150**  
2000 Regular Cab XL. V6, tilt/cruise, red, extra clean. \$7,995

**GREENVILLE**  
FORD LINCOLN MERCURY  
866-887-6580

**FORD F150**  
2000 Regular Cab XL. V6, tilt/cruise, red, extra clean. \$7,995

**GREENVILLE**  
FORD LINCOLN MERCURY  
866-887-6580

**Trucks-Domestic**

**CHEVY SILVERADO**  
1973 with sidesteps. \$2500 903-454-3334

**FORD F150**  
2000 Supercab XLT. 4x4, V8, all power, lots of extras, Super clean. \$8,995.

**GREENVILLE**  
FORD LINCOLN MERCURY  
866-887-6580

**FORD F150**  
2000 Supercab. Red, bedliner, all power. \$10,988

**GREENVILLE**  
FORD LINCOLN MERCURY  
866-887-6580

**FORD LARIAT**  
1990. Automatic, XLT, ex-cab, all power. st#2446C, \$5,295.

**ALAN REUBER**  
903-450-4218

**FORD RANGER XLT**  
2000. Tan, supercab, all power, automatic. \$8,995

**GREENVILLE**  
FORD LINCOLN MERCURY  
866-887-6580

**General Notices**

**ROYSE CITY ISD** is currently taking sealed proposals for: SCHOOL BUSES. Deadline for proposals is Tuesday, July 8, 2003 at 2:00pm. Proposals should be sealed and marked "Sealed Proposal # 03-04-01". Proposals should be mailed or hand delivered to: Angel Norris-Royse City ISD, 115 East I-30, Royse City, TX 75189. For a copy of detailed specs., please call Angel Norris @ 972-636-2413.

**General Notices**

**ROYSE CITY ISD** is currently taking sealed proposals for: ATHLETIC SUPPLIES. Deadline for proposals is Tuesday, July 8, 2003 at 3:00pm. Proposals should be sealed and marked "Sealed Proposal #03-04-02". Proposals should be mailed or hand delivered to: Angel Norris-Royse City ISD, 115 East I-30, Royse City, TX 75189. For a copy of detailed specs. Please call Angel Norris @ 972-636-2413.

**BE SURE TO CHECK YOUR AD**

**PUBLIC NOTICE**

**NOTICE OF APPLICATION FOR CERTIFICATE OF CONVENIENCE AND NECESSITY (CCN) TO PROVIDE WATER UTILITY SERVICE IN ROCKWALL AND HUNT COUNTIES**

The City of Royse City has filed an application to amend CCN No. 12827 with the Texas Commission on Environmental Quality to provide water utility service in Rockwall and Hunt Counties.

The proposed utility service area is located in the southern portion of Royse City, Texas, and is generally bounded on the north and west by I30; on the east by CR 2592; on the south by Parker Creek. The total area being requested includes approximately 4,380 acres and 400 current customers.

A copy of the proposed service area map is available at City Hall of Royse City, 100 West Main Street, Royse City, Texas 75189 972/636-2250.

A request for a public hearing must be in writing. You must state (1) your name, mailing address, and daytime telephone number; (2) the applicant's name, application number or another recognizable reference to this application, (3) the statement, "I/we request a public hearing", (4) a brief description of how you or the persons you represent, would be adversely affected by the granting of the application or CCN; and (5) your proposed adjustment to the application or CCN which would satisfy your concerns and cause you to withdraw your request for a hearing.

Persons who wish to intervene or comment should write the:

Texas Commission on Environmental Quality  
Water Supply Division  
Utilities and Districts Section, MC-153  
P.O. Box 13087  
Austin, TX 78711-3087

within thirty (30) days from the date of this publication or notice. A public hearing will be held only if a legally sufficient hearing request is received or if the Commission on its own motion requests a hearing. Only those individuals who submit a written hearing request or a written request to be notified if a hearing is set will receive notice if a hearing is scheduled.

If a public hearing is requested, the Executive Director will not issue the CCN and will forward the application to the State Office of Administrative Hearings (SOAH) for a hearing. If no settlement is reached and an evidentiary hearing is held, the SOAH will submit a recommendation to the Commission for final decision. If an evidentiary hearing is held, it will be a legal proceeding similar to a civil trial in state district court.

**PUBLICATION**

**CITY OF ROYSE CITY TO OBTAIN A CERTIFICATE AND NECESSITY (CCN) FOR UTILITY SERVICE IN ROCKWALL AND HUNT COUNTIES**

located within the City of Royse City, Texas and Rockwall, Collin and Hunt Counties.

located within the City of Royse City, Texas and

by CR 1031 and CR 2652 and the northernmost end from 1' to 4,500' beyond the Hunt County (s. 20856), Crenshaw Road and points from 1' to 2' west by the City of Fate (CCN No. 20856) and City ETJ.

roximately 15,360 acres and 1,200 current cus-

available at the City Hall of Royse City, 100

riting. You must state (1) your name, mailing address; (2) the applicant's name, application number or another reference to this application; (3) the statement, "I/we request a public hearing", (4) a brief description of how you or the persons you represent, would be adversely affected by the granting of the application or CCN; and (5) your proposed adjustment to the application or CCN which would satisfy your concerns and cause you to withdraw your

should write the:

Texas Commission on Environmental Quality  
Resource Management Division  
Districts Section, MC-153  
P.O. Box 13087  
Austin, TX 78711-3087

is publication or notice. A public hearing will be held only if a legally sufficient hearing request is received or if the Commission on its own motion requests a hearing. Only those individuals who submit a written hearing request or a written request to be notified if a hearing is set will receive notice if a hearing is scheduled.

If a public hearing is requested, the Executive Director will not issue the CCN and will forward the application to the State Office of Administrative Hearings (SOAH) for a hearing. If no settlement is reached and an evidentiary hearing is held, the SOAH will submit a recommendation to the Commission for final decision. If an evidentiary hearing is held, it will be a legal proceeding similar to a civil trial in state district court.

**SOAH DOCKET NO. 582-04-0253 and 582-04-1268  
TCEQ DOCKET NOS. 2003-0737-UCR, 2003-0738-UCR, and 2003-1289-UCR**

<b>APPLICATION OF THE CITY OF ROYSE CITY TO AMEND WATER CCN AND TO OBTAIN SEWER CCN IN COLLIN, ROCKWALL, AND HUNT COUNTIES</b>	§	
	§	<b>BEFORE THE STATE OFFICE</b>
	§	
	§	
	§	
	§	
<b>APPLICATION OF VERANDAH COMMUNITIES, LP TO OBTAIN SEWER CCN IN HUNT AND ROCKWALL COUNTIES</b>	§	
	§	<b>OF</b>
	§	
	§	
	§	
<b>APPLICATION OF PARKER CREEK ESTATES, L.P. TO OBTAIN A WATER AND SEWER CCN IN ROCKWALL COUNTY, TEXAS, APPLICATION NOS. 34297-C AND 34301-C</b>	§	
	§	<b>ADMINISTRATIVE HEARINGS</b>
	§	

**ORDER NO. 3  
SETTING OUT SCHEDULE AND PROCEDURES:  
NOTICE OF HEARING ON THE MERITS**

On January 5, 2004, a consolidated preliminary hearing was held in these dockets. The following appeared at the preliminary hearing and were recognized and admitted as parties: (1) City of Royse City (Royse City); (2) Parker Creek Estates, L.P. (Parker Creek); (3) Verandah Communities, L.P. (Verandah); (4) Verandah Freshwater Supply District (VFSD); (5) the Honorable Dean M. Gandy (Mr. Gandy); (6) the City of Fate (Fate); and (7) the Executive Director (ED) of the Texas Commission on Environmental Quality. No other persons or entities sought party status. At the preliminary hearing, the ED offered eight exhibits, all of which were admitted, for purposes of establishing notice and jurisdiction. No parties challenged notice or jurisdiction, and the Administrative Law Judge (ALJ) finds that both have been properly shown.

Royse City moved for a consolidated hearing in these cases. Parker Creek, Verandah, and VFSD opposed a consolidated hearing. After considering the arguments of the parties, the ALJ concluded that a consolidated hearing was appropriate and granted Royse City's motion. Therefore, the above-referenced cases are consolidated for a joint hearing on the merits.

SOAH DOCKET NOS. 582-04-0253 and 582-04-1268  
TCEQ DOCKET NOS. 2003-0737-UCR,  
2003-0738-UCR, and 2003-1289-UCR

ORDER NO. 3

PAGE 2

### I. SCHEDULE

At the preliminary hearing, the parties conferred and presented the following schedule, which is hereby adopted and shall govern this proceeding:

DEADLINE/DATE	ACTIVITY
1/12/04	Discovery begins
4/12/04	Last day to propound written discovery on the parties
5/4/04	All discovery responses and supplementation due
6/3/04	All applicants' prefiled direct testimony due
7/2/04	All protestants' prefiled testimony due
7/30/04	Executive Director's prefiled direct testimony due
8/13/04	Deadline for completing depositions
9/3/04	Deadline for filing objections to all prefiled testimony
9/17/04	Deadline for filing responses to objections to prefiled testimony
9/24/04	Prehearing Conference (10:00 a.m.)
9/28/04	Hearing on the Merits (9:00 a.m.)

### II. HEARING DATE AND LOCATION

The hearing on the merits will convene at 9:00 a.m. on **September 28, 2004**, at the State Office of Administrative Hearings, 4<sup>th</sup> Floor, 300 West 15<sup>th</sup> Street, Austin, Texas. Once convened, the hearing shall continue from day to day until completed. Currently, the parties anticipate four days for the hearing and the parties are expected to reserve that amount of time. The prehearing conference will convene at 10:00 a.m. on **September 24, 2004**, at the same location listed above for the hearing on the merits. At the prehearing conference, the parties shall be prepared to address party alignment, order of presentation and questioning by the parties, and time allocations and limitations, if needed.

SOAH DOCKET NOS. 582-04-0253 and 582-04-1268  
TCEQ DOCKET NOS. 2003-0737-UCR,  
2003-0738-UCR, and 2003-1289-UCR

ORDER NO. 3

PAGE 3

### III. PROCEDURAL RULES

Except as otherwise provided herein, this case shall be conducted in accordance with the procedural rules of the TCEQ and SOAH. *See* 30 TEX. ADMIN. CODE (TAC) Chapter 80 and 1 TAC Chapter 155. In the event of a conflict, the TCEQ's rules apply. 1 TAC § 155.1 (b).

### IV. DISCOVERY

Discovery shall be conducted according to the Texas Rules of Civil Procedure (TRCP), as supplemented by SOAH's discovery rules, 1 TAC § 155.31. The TRCP shall be interpreted consistently with chapter 80 of the TCEQ's rules, the Texas Water Code, the Texas Health and Safety Code, and the Administrative Procedure Act. *See* 30 TAC § 80.151. Pursuant to SOAH Procedural Rule 155.23(3), discovery documents shall be served on the other parties but shall not be filed with the ALJ unless such materials are the subject of a discovery dispute and only those portions relevant to the dispute shall be attached to any pertinent motion.

The parties are expected to attempt to resolve discovery disputes without the need for the ALJ's intervention. Significant disputes which cannot be resolved, however, should be brought to the ALJ's attention in a motion to compel. Any request for relief should include a copy of any discovery correspondence necessary for an informed ruling on the dispute. Parties may obtain disclosure of information and material as provided in TRCP 194. The parties are encouraged to cooperate and reach agreements regarding discovery matters.

The parties have agreed, for purposes of this proceeding, that voluminous responses shall be those responses in excess of 25 pages per request, or responses in excess of 200 pages per discrete set of discovery requests. The parties may change this definition, without order of the ALJ, but only by agreement of the parties.

SOAH DOCKET NOS. 582-04-0253 and 582-04-1268  
TCEQ DOCKET NOS. 2003-0737-UCR,  
2003-0738-UCR, and 2003-1289-UCR

ORDER NO. 3

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## V. PLEADINGS

Unless specified or agreed otherwise, to be considered filed on a particular day, filings must be received by the ALJ and the parties by 5:00 p.m. on that date. When something is due by a certain date or time, it is not sufficient to merely mail the filing on that day. 1 TAC § 155.23 (4).

Unless a party obtains an order granting oral argument, the ALJ will rule on motions based on the written pleadings. If oral argument is granted, it shall be conducted by telephone conference, unless the ALJ specifies otherwise. The party requesting oral argument shall make arrangements for the telephone conference in a manner so as not to delay a ruling on the motion.

Motions or other correspondence may be FAXED. Filings should be sent to all parties contemporaneously (*i.e.*, that same day) with any filing to the ALJ. This is particularly important when deadlines for responses are involved since it will be assumed that all parties received a filing the same day the ALJ did and the time for responses begins accordingly. If a deadline is approaching and a party cannot send a fax for reasons beyond its control [*e.g.* both SOAH fax numbers (Natural Resources 512/936-0730 and SOAH Main Docket 512/475-4994) have been busy since 4:00 p.m.], call and tell the ALJ's assistant, Lisa Serrano (512/936-0724), or the SOAH Docket Division (512/475-3445) of the problem. Parties shall use the ALJ's service list and this list should be attached to all filings.

## VI. MEDIATION

The parties are advised that both SOAH and the TCEQ provide trained mediators who can conduct mediation and assist the parties in attempting to resolve this matter without the need for a hearing. To obtain more information on SOAH's mediation program, the parties may submit a request in writing to the undersigned ALJ or may contact Renee Rusch, the ALJ who is the leader of SOAH's Alternative Dispute Resolution Team. Judge Rusch may be contacted by telephone at (512) 475-4993. If the parties wish to have a mediator assigned to this case, they must file a request in writing in this docket.

SOAH DOCKET NOS. 582-04-0253 and 582-04-1268  
TCEQ DOCKET NOS. 2003-0737-UCR,  
2003-0738-UCR, and 2003-1289-UCR

ORDER NO. 3

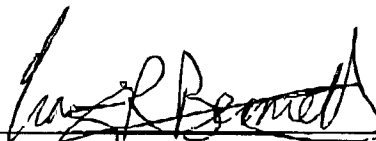
PAGE 5

### VII. TRANSCRIPT

For any proceeding in a docket set to last longer than one day, a court reporter is generally required. 1 TAC § 155.43(b). Upon his own motion, the ALJ may request a verbatim record and an original and two copies of a transcript of a proceeding. 30 TAC § 80.23 (b)(4).

Because the parties estimate that the hearing on the merits will take more than one day, a court reporter will be needed to transcribe the hearing and to deliver the original and one copy of that transcript to the ALJ and one copy to the ED. Royse City shall work with the TCEQ Chief Clerk's Office to ensure that a court reporter attends the hearing. Royse City also shall pay the cost of that recording and transcription, subject to an allocation of those costs among all the parties at the end of the case. 30 TAC § 80.23.

SIGNED January 6, 2004.



\_\_\_\_\_  
**CRAIG R. BENNETT**  
**ADMINISTRATIVE LAW JUDGE**  
**STATE OFFICE OF ADMINISTRATIVE HEARINGS**

**STATE OFFICE OF ADMINISTRATIVE HEARINGS  
WILLIAM P. CLEMENTS BUILDING  
300 West Fifteenth Street  
Austin, Texas 78701  
Phone (512) 475-4993  
Facsimile (512) 475-4994**

**SERVICE LIST**

**AGENCY: TEXAS COMMISSION ON ENVIRONMENTAL QUALITY  
(TCEQ)**

**STYLE/CASE: CITY OF ROYSE CITY AND PARKER CREEK ESTATES, LP**

**SOAH DOCKET NUMBER: 582-04-0253 & 582-04-1268**

**TCEQ DOCKET NUMBERS: 2003-0737-UCR, 2003-0738-UCR & 2003-1289-UCR**

**ADMINISTRATIVE COURT**

**STATE OFFICE OF ADMINISTRATIVE  
HEARINGS**

**CRAIG R. BENNETT  
PRESIDING ADMINISTRATIVE LAW JUDGE**

**PARTIES**

**REPRESENTATIVE/ADDRESS**

**TEXAS COMMISSION ON  
ENVIRONMENTAL QUALITY**

**Geoffrey Kirshbaum  
Texas Commission on Environmental Quality  
MC-175  
P.O. Box 13087  
Austin, TX 78711-3087  
512/239-0600  
512/239-0606 (Fax)**

**OFFICE OF THE PUBLIC INTEREST  
COUNSEL OF THE TEXAS COMMISSION ON  
ENVIRONMENTAL QUALITY**

**Blas Coy  
Office of the Public Interest Counsel  
Texas Commission on Environmental Quality  
MC-103  
P.O. Box 13087  
Austin, TX 78711-3087  
512/239-6363  
512/239-6377 (Fax)**

**TEXAS COMMISSION ON  
ENVIRONMENTAL QUALITY**

**Amy Cortinas  
Utility Rates and Services Section  
Water Utilities Division - MC 153  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, TX 78711-3087  
512/239-6960  
512/239-6972 (Fax)**

SOAH DOCKET NOS. 582-04-0253 & 582-04-1268  
TCEQ DOCKET NOS. 2003-0737-UCR, 2003-0738-UCR & 2003-1289-UCR

## SERVICE LIST

PAGE 2

VERANDAH COMMUNITIES/VERANDAH  
FRESHWATER SUPPLY DISTRICT/PARKER  
CREEK ESTATES, LP.

Mark H. Zeppa  
Law Offices of Mark Zeppa, PC  
4833 Spicewood Springs Road #202  
Austin, TX 78759-8436  
512/346-4011  
512/346-6847 (Fax)

CITY OF ROYSE CITY

Kerry Russell  
Russell, Moorman & Rodriguez, LLP  
102 West Morrow Street, Suite 103  
Georgetown, TX 78626  
512/930-1317  
512/864-7744 (Fax)

DEAN M GANDY

Susan E. Potts  
David Klein  
Potts & Reilly, L.L.P.  
Attorneys And Counselors  
401 West 15<sup>th</sup> Street, Suite 850  
Austin, TX 78701-1665  
512/469-7474  
512/469-7480 (Fax)

CITY OF FATE

Skip Newsom  
Attorney  
3724 Jefferson St., Ste. 200  
Austin, TX 78731  
512/477-4121  
512/477-2860 (Fax)

---

xc: Docket Clerk, State Office of Administrative Hearings  
Docket Clerk, Office of the Chief Clerk, TCEQ, Fax No. (512) 239-3311



**STATE OFFICE OF ADMINISTRATIVE HEARINGS**

**William P. Clements Building  
300 West Fifteenth Street  
Room 502  
Austin, Texas 78701  
Phone (512) 475-4993  
Facsimile (512) 936-0730**

**DATE:****January 6, 2004****NUMBER OF PAGES INCLUDING THIS COVER SHEET:****8****SOAH DOCKET NO.:****582-04-0253****TCEQ DOCKET Nos.:****2003-0737-UCR & 2003-0738-UCR****REGARDING:****Order No. 3 - Setting Out Schedule and Procedures; Notice of Hearing  
on t he Merits****FROM:****Judge Craig R. Bennett**

<b>FAX TO:</b>	<b>FAX NO.:</b>
<b>Geoffrey Kirshbaum (TCEQ ED)</b>	<b>239-0606</b>
<b>Kerry Russell (Russell, Moorman &amp; Rodriguez)</b>	<b>864-7744</b>
<b>Mark H. Zeppa (Law Offices of Mark H. Zeppa, P.C.)</b>	<b>346-6847</b>
<b>Susan E. Potts/David Klein (Potts &amp; Reilly, L.L.P.)</b>	<b>469-7480</b>
<b>Skip Newsom (Attorney)</b>	<b>477-2860</b>
<b>Blas Coy (TCEQ - OPIC)</b>	<b>239-6377</b>
<b>Docket Clerk (TCEQ)</b>	<b>239-3311</b>
<b>Amy Cortinas (TCEQ Utilities Rates and Services)</b>	<b>239-6972</b>

**NOTE: IF ALL PAGES ARE NOT RECEIVED, PLEASE CONTACT Lisa Serrano at 512/475-4993.**

The information contained in this facsimile message is privileged and confidential information intended only for the use of the above-named recipient(s) or the individual or agent responsible to deliver it to the intended recipient. You are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please immediately notify us by telephone, and return the original message to us at the above address via the U.S. Postal Service. Thank you.

**RM&R**RUSSELL, MOORMAN & RODRIGUEZ, L.L.P.  
ATTORNEYS AT LAW

TEXAS HERITAGE PLAZA · 102 WEST MORROW STREET, SUITE 103

GEORGETOWN, TEXAS 78626

PHONE (512) 930-1317 · FAX (512) 864-7744

Email: krussell@rmlawfirm.com

January 6, 2004

**VIA FACSIMILE**

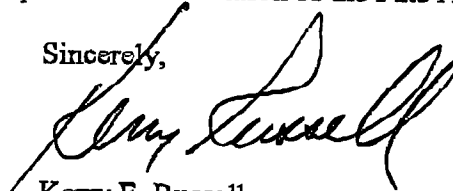
Mr. Craig Bennett  
State Office of Administrative Hearings  
300 West 15<sup>th</sup> Street  
Room 502  
Austin, Texas 78701

Re: SOAH Docket Nos. 582-04-0252 and 582-04-1268, TCEQ Docket Nos. 2003-0737-UCR, 2003-0738-UCR, and 2003-1289-UCR, *Applications of the City of Royse City to Amend Water CCN and to obtain Sewer Certificate of Convenience and Necessity in Collin, Rockwall, and Hunt Counties, Application of Verandah Communities, LP to Obtain Sewer CCN in Hunt and Rockwall Counties, and Application of Parker Creek Estates, LP, to Obtain a Water and Sewer CCN in Rockwall County, Texas*

Dear Judge Bennett:

The City of Royse City ("City") is in receipt of an email from Mr. Marc Zeppa, counsel for Verandah Communities, LP ("Verandah") and Parker Creek Estates, L.P. ("Parker Creek"), wherein Mr. Zeppa has identified that his schedule has changed and he is now available on February 13, 2004, for a Preliminary Hearing in the City of Fate ("Fate") CCN application, see referenced email attached as "Attachment A". As you requested, we are notifying you of this change in schedules which should allow expedited consideration of the Fate Application.

Sincerely,



Kerry E. Russell

cc: Service List  
Mr. Connie Goodwin

From: Mark H. Zeppa, Attorney at Law [mailto:mhzeppa@attglobal.net]  
Sent: Monday, January 05, 2004 1:42 PM  
To: Kerry Russell; Geoffrey Kirshbaum; David Klein; Skip Newsom  
Subject: Royse City, Fate, Verandah & Parker Creek Scheduling (1-5-04)

Upon returning to my office I was able to check the last revised scheduling order in the Quadvest rate case against my Palm Pilot and desk computer and found that my computers were in error. I do not have the scheduling conflict during the last two weeks of February that I thought that I did.

The State Bar Water Rights Seminar is in San Antonio on Thursday and Friday February 26 and 27 and I would like to avoid these days. I am scheduled to instruct at a sliding series off seminars Tuesday through Friday the preceding week so Monday February 23 through Wednesday February 25th are the best days for me. I can be available the week before if I shuffle my lecture times.

Mark

Mark Zeppa  
Law Offices of Mark H. Zeppa, PC  
Independent Water & Sewer Companies of Texas  
4833 Spicewood Springs Road, Suite 202  
Austin, Texas 78759-8436  
(512) 346-4011, Fax (512) 346-6847  
mhzeppa@attglobal.net  
IWSCOT@attglobal.net

Attachment A

**Russell, Moorman & Rodriguez, L.L.P.**  
102 West Morrow Street, STE 103  
Georgetown, Texas 78626  
Telephone: (512) 930-1317  
Facsimile: (512) 864-7744

TELECOPIER COVER SHEET

January 6, 2004

PLEASE DELIVER THE FOLLOWING PAGES TO:

SOAH Docketing / Craig Bennett	Fax: 512/ 475-4994
Blas Coy	Fax: 512/ 239-6377
Geoffrey Kirschbaum James Parker	Fax: 512/ 239-0606
Mark Zeppa	Fax: 512/ 346-6847
Skip Newsom	Fax: 512/ 477-2860
TCEQ Docketing	Fax: 512/ 239-3311
David Klein	Fax: 512/ 469-7480

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CLIENT NUMBER: 390-00

FROM: Angela K. Moorman/Kerry Russell

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NUMBER OF PAGES: 2 + cover page

COMMENTS:

RE: Letter related to schedules

IF YOU DO NOT RECEIVE ALL PAGES, PLEASE CALL US AS SOON AS POSSIBLE AT (512) 930-1317.  
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THE ORIGINAL MESSAGE TO US AT THE ABOVE ADDRESS VIA THE U.S. POSTAL SERVICE. THANK YOU.

# RM&R

RUSSELL, MOORMAN & RODRIGUEZ, L.L.P.  
ATTORNEYS AT LAW

TEXAS HERITAGE PLAZA · 102 WEST MORROW STREET, SUITE 103  
GEORGETOWN, TEXAS 78626  
PHONE (512) 930-1317 · FAX (512) 864-7744

Email: amoorman@rmrlawfirm.com

January 12, 2004

CHIEF CLERK'S OFFICE

**VIA FACSIMILE**

Ms. LaDonna Castañuela  
Office of Chief Clerk (MC-105)  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, Texas 78711-3087

Re: Request for Disclosure, *Application of the City of Royse City to Amend Water CCN and to Obtain Sewer CCN in Collin, Rockwall, and Hunt Counties*, Consolidated Docket, SOAH Docket Nos. 582-04-0253 & 582-04-1268 TCEQ Docket Nos. 2003-0737-UCR, 2003-0738-UCR, & 2003-1289-UCR.

Dear Ms. Castañuela:

Enclosed please the City of Royse City's Requests for Disclosure to Verandah Communities, LP, Verandah Freshwater Supply District, Parker Creek Estates, L.P., and the Executive Director of the Commission in the above-referenced consolidated proceeding. If you have any questions, please telephone me or Mr. Kerry Russell at (512) 930-1317.

Sincerely,



Angela K. Moorman

390\00\ur040111skm9

Enclosures

cc: Service List  
Mr. Connie Goodwin  
Mr. Kerry Russell

# RM&R

RUSSELL, MOORMAN & RODRIGUEZ, L.L.P.  
ATTORNEYS AT LAW

TEXAS HERITAGE PLAZA · 102 WEST MORROW STREET, SUITE 103  
GEORGETOWN, TEXAS 78626  
PHONE (512) 930-1317 · FAX (512) 864-7744

Email: amoorman@rmrlawfirm.com

January 12, 2004

**VIA FACSIMILE**

Mr. Mark H. Zeppa  
Law Offices of Mark Zeppa, PC  
4833 Spicewood Springs Road #202  
Austin, Texas 78759-8436

Re: Request for Disclosure, *Application of the City of Royse City to Amend Water CCN and to Obtain Sewer CCN in Collin, Rockwall, and Hunt Counties*, Consolidated Docket, SOAH Docket Nos. 582-04-0253 & 582-04-1268 TCEQ Docket Nos. 2003-0737-UCR, 2003-0738-UCR, & 2003-1289-UCR.

Dear Mr. Zeppa:

Enclosed please the City of Royse City's Requests for Disclosure to Verandah Communities, LP, Verandah Freshwater Supply District, and Parker Creek Estates, L.P. in the above-referenced consolidated proceeding. If you have any questions, please telephone me or Mr. Kerry Russell at (512) 930-1317.

Sincerely,



Angela K. Moorman

390\00\Inr040111akm7

Enclosures

cc: Service List  
Mr. Connie Goodwin  
Mr. Kerry Russell

CHIEF CLERK'S OFFICE  
JAN 13 2004 10:00 AM

**SOAH DOCKET NOS. 582-04-0253 & 582-04-1268  
TCEQ DOCKET NOS. 2003-0737-UCR, 2003-0738-UCR, & 2003-1289-UCR**

**APPLICATION OF THE CITY OF  
ROYSE CITY TO AMEND WATER  
CCN AND TO OBTAIN SEWER CCN IN  
COLLIN, ROCKWALL, AND HUNT  
COUNTIES**

**BEFORE THE STATE OFFICE**

**APPLICATION OF VERANDAH  
COMMUNITIES, LP TO OBTAIN  
SEWER CCN IN HUNT AND  
ROCKWALL COUNTIES**

**OF**

**APPLICATION OF PARKER CREEK  
ESTATES, L.P. TO OBTAIN A WATER  
AND SEWER CCN IN ROCKWALL  
COUNTY, TEXAS, APPLICATION NOS.  
34297-C AND 34301-C**

**ADMINISTRATIVE HEARINGS**

**CITY OF ROYSE CITY'S REQUEST FOR DISCLOSURE  
TO VERANDAH COMMUNITIES, LP**

**TO: Verandah Communities, LP, by and through its attorney of record, Mr. Mark H. Zeppa, Law Offices of Mark Zeppa, PC, 4833 Spicewood Springs Road #202, Austin, Texas, 78759-8436.**

The City of Royse City ("Royse City"), serves this, its Request for Disclosure, on Verandah Communities, LP ("Verandah LP") through its attorney of record, Mr. Mark H. Zeppa, pursuant to Chapter 2001 of the Texas Government Code, the Texas Rules of Civil Procedure, and applicable rules and regulations of the Texas Commission on Environmental Quality (the "Commission" or "TCEQ") and the State Office of Administrative Hearings ("SOAH"). Within twenty (20) days of service of this request, Verandah LP must serve a signed copy of the responses to these requests upon counsel for Royse City, Mr. Kerry E. Russell or Ms. Angela K. Moorman, at the following address: Russell, Moorman & Rodriguez, L.L.P., 102 West Morrow Street, Suite 103, Georgetown, Texas, 78626.

SOAH DOCKET NOS. 582-04-0 & 582-04-1268  
TCEQ DOCKET NOS. 2003-0737-UCR, 2003-0738-UCR, & 2003-1289-UCR

## A. DEFINITIONS

The following paragraphs state definitions that apply to this Request for Disclosure in its entirety, including the Instructions noted below:

- (1) "Royse City" refers to the City of Royse City, and each of its officers, employees, agents, representatives, attorneys, and all other natural persons, business or legal entities, presently or formerly acting in concert with, under the direct or indirect control of, or on behalf of Royse City.
- (2) "You," "your," and "Verandah LP" means Verandah Communities, LP, its officers, employees, agents, representatives, attorneys, and all other natural persons, businesses or legal entities, presently or formerly, acting in concert with, under the direct or indirect control of, or on behalf of Verandah LP.
- (3) "Document(s)" means all written, typed, or printed matters, and all magnetic or other records, papers, or documentation of any kind or description (including, without limitation, letters, correspondence, telegrams, memoranda, notes, minutes, contracts, agreements, notations of telephone or in-person conversations, conferences, inter-office communications, e-mail, microfilm, bulletins, circulars, accounts, writings, drawings, graphs, charts, pamphlets, books, facsimiles, invoices, tape recordings, video recordings, photographs, computer printouts and work sheets), including all originals and all drafts and copies not identical to the originals, all photographs and graphic matter, however produced or reproduced, and all compilations of data from which information can be obtained, and any and all writings or recordings of any type or nature, whether or not prepared by you, in your actual possession, custody, or control, including those in the possession, custody, or control of any and all present or former directors, officers, employees, representatives, consultants, accountants, attorneys, agents, other natural persons, business or legal entities, presently or formerly acting in concert with, under the direct or indirect control of, or on behalf of Verandah LP.
- (4) "Describe" or "identify," when used in reference to a document, means you must state, to the fullest extent possible, the following:
  - (a) The nature (*e.g.*, letter, handwritten note) of the document;
  - (b) The title or heading that appears on the document;
  - (c) The date of the document and the date of each addendum, supplement, or other addition or change;
  - (d) The identity of: the author of the document; any signatory(ies) to the document; and the person on whose behalf or at whose request or direction the document was prepared or delivered; and

CITY OF ROYSE CITY'S REQUEST FOR DISCLOSURE TO VERANDAH COMMUNITIES, LP



SOAH DOCKET NOS. 582-04-0 & 582-04-1268  
TCEQ DOCKET NOS. 2003-0737-UCR, 2003-0738-UCR, & 2003-1289-UCR

- (e) The present location of the document, and the name, address, position or title, and telephone number(s) of the person(s) having custody of the document.
- (5) "Describe" or "identify," when used in reference to a natural person, means you must state, to the fullest extent possible, the following:
- (a) The full name;
  - (b) The present or last known residential address, including zip code;
  - (c) The present or last known residential and office telephone number(s);
  - (d) The present or last known occupation, job title, employer, and employer's address, including zip code;
  - (e) The occupation, job title, employer, and employer's address at the time of the event or period referred to in each particular interrogatory; and
  - (f) In the case of any person other than an individual, identify the officer, employee, or agent most closely connected with the subject matter of the interrogatory, and the officer who is responsible for supervising that officer or employee.
- (6) "Communication" means any oral or written communication of which Verandah LP has knowledge, information, or belief.
- (7) "File" means any collection or group of documents maintained, held, stored, or used together, including, without limitation, all collections of documents maintained, held, or stored in folders, notebooks, or other devices for separating or organizing documents.
- (8) "Person(s)" means any natural person, corporation, firm, association, partnership, joint venture, proprietorship, governmental body, or any other organization, business, or legal entity, and all other predecessors or successors in interest.
- (9) "Concerning" means, in whole or in part, directly or indirectly, referring to, relating to, being connected with, commenting on, responding to, showing, describing, analyzing, reflecting, embodying, mentioning, or constituting the subject matter identified in the request.
- (10) "Date" means the exact day, month, and year, if ascertainable or, if not, the best approximation.
- (11) The word "and" means "and/or."
- (12) The word "or" means "or/and."

CITY OF ROYSE CITY'S REQUEST FOR DISCLOSURE TO VERANDAH COMMUNITIES, LP

SOAH DOCKET NOS. 582-04-0253 & 582-04-1268  
TCEQ DOCKET NOS. 2003-0737-UCR, 2003-0738-UCR, & 2003-1289-UCR

- (13) "Royse City Sewer CCN Application" refers to the Application of the City of Royse City to Obtain a Sewer Certificate of Convenience and Necessity ("CCN") in Collin, Rockwall, and Hunt counties, Application No. 34277-C, Consolidated SOAH Docket Nos. 582-04-0253 and 582-04-1268, Consolidated TCEQ Docket Nos. 2003-0737-UCR, 2003-0738-UCR, and 2003-1289-UCR, pending before the Commission and/or SOAH and any and all information gathered, generated, compiled, or submitted to any other state or federal agency by or on behalf of Royse City related to Application No. 34277-C.
- (14) "Royse City Water CCN Application" refers to the Application of the City of Royse City to Amend Water CCN No. 12827 in Rockwall and Hunt counties, Application No. 34270-C, Consolidated SOAH Docket Nos. 582-04-0253 and 582-04-1268, Consolidated TCEQ Docket Nos. 2003-0737-UCR, 2003-0738-UCR, and 2003-1289-UCR, pending before the Commission and/or SOAH and any and all information gathered, generated, compiled, or submitted to any other state or federal agency by or on behalf of Royse City related to Application No. 34270-C.
- (15) "Verandah LP Sewer CCN Application" refers to the Application of Verandah Communities, LP to Obtain a Sewer CCN in Hunt and Rockwall counties, Application No. 34267-C, Consolidated SOAH Docket Nos. 582-04-0253 and 582-04-1268, Consolidated TCEQ Docket Nos. 2003-0737-UCR, 2003-0738-UCR, and 2003-1289-UCR, pending before the Commission and/or SOAH and any and all information gathered, generated, compiled, or submitted to any other state or federal agency by or on behalf of Verandah LP related to Application No. 34267-C.
- (16) "Parker Creek L.P. Sewer CCN Application" refers to the Application of Parker Creek Estates, L.P. to Obtain a Sewer CCN in Rockwall County, Application No. 34297-C, Consolidated SOAH Docket Nos. 582-04-0253 and 582-04-1268, Consolidated TCEQ Docket Nos. 2003-0737-UCR, 2003-0738-UCR, and 2003-1289-UCR, pending before the Commission and/or SOAH and any and all information gathered, generated, compiled, or submitted to any other state or federal agency by or on behalf of Parker Creek Estates, L.P. related to Application No. 34297-C.
- (17) "Parker Creek L.P. Water CCN Application" refers to the Application of Parker Creek Estates, L.P. to Obtain a Water CCN in Rockwall County, Application No. 34301-C, Consolidated SOAH Docket Nos. 582-04-0253 and 582-04-1268, Consolidated TCEQ Docket Nos. 2003-0737-UCR, 2003-0738-UCR, and 2003-1289-UCR, pending before the Commission and/or SOAH and any and all information gathered, generated, compiled, or submitted to any other state or federal agency by or on behalf of Parker Creek Estates, L.P. related to Application No. 34301-C.
- (18) All definitions found in Texas Administrative Code title 30, chapter 291 and Texas Water Code chapters 11 and 13 are incorporated herein, verbatim.

CITY OF ROYSE CITY'S REQUEST FOR DISCLOSURE TO VERANDAH COMMUNITIES, LP

SOAH DOCKET NOS. 582-04-0 & 582-04-1268  
TCEQ DOCKET NOS. 2003-0737-UCR, 2003-0738-UCR, & 2003-1289-UCR

## B. INSTRUCTIONS

- (1) You may not object to requests for disclosure.
- (2) For every document that no longer exists or cannot be located, or for any requested information about a document that no longer exists or cannot be located: identify the document; state how and when the document passed out of existence, or when it could no longer be located; state the reason(s) for the disappearance; identify each person having knowledge about the disposition or loss of the document; and identify each document evidencing the existence or nonexistence of each document that cannot be located.
- (3) It is requested that all documents that might impact on the subject matter of the Royse City Sewer CCN Application, the Royse City Water CCN Application, the Verandah LP Sewer CCN Application, the Parker Creek L.P. Sewer CCN Application, and/or the Parker Creek L.P. Water CCN Application be preserved and that any ongoing process of document destruction involving such documents cease.
- (4) Furnish all information available to you and known by you, or in your possession or that of your agents and attorneys, or appearing in your records.
- (5) In those instances when requested information or requested documents are stored only on software, computer based information, or other data compilations, you should either produce the raw data along with all codes and programs for translating it into usable form, or produce the information in a finished usable form that includes all necessary glossaries, keys, and indices for interpretation of the material.
- (6) You are under a duty to supplement your answers to these requests for disclosure that are incomplete or incorrect when made. Furthermore, you are under a duty to timely amend your answers if you obtain information on the basis of which you know that an answer either: (1) was incorrect or incomplete when made; or (2) although correct and complete when made, is no longer true and complete and the circumstances are such that failure to amend the answer is in substance misleading.

## C. REQUESTS FOR DISCLOSURE

Pursuant to TEX. R. CIV. P. 194, Verandah LP is requested to disclose, within twenty (20) days of service of this request, the information or material described in Rule 194.2.

**Rule 194.2(a)** The correct names of the parties to the lawsuit.

**RESPONSE:**

CITY OF ROYSE CITY'S REQUEST FOR DISCLOSURE TO VERANDAH COMMUNITIES, LP

SOAH DOCKET NOS. 582-04-01, 582-04-1268  
TCEQ DOCKET NOS. 2003-0737-UCR, 2003-0738-UCR, & 2003-1289-UCR

**Rule 194.2(c)** The legal theories and, in general, the factual bases of the responding party's claims or defenses.

**RESPONSE:**

**Rule 194.2(d)** The amount and any method of calculating economic damages.

**RESPONSE:**

**Rule 194.2(e)** The name, address, and telephone number of persons having knowlcdgc of relevant facts, and a brief statement of each identified person's connection with the case.

**RESPONSE:**

**Rule 194.2(f)** For any testifying expert:

- (1) The expert's name, address, and telephone number.

**RESPONSE:**

**Rule 194.2(f)** For any testifying expert:

- (2) The subject matter on which the expert will testify.

**RESPONSE:**

**Rule 194.2(f)** For any testifying expert:

- (3) The general substance of the expert's mental impressions and opinions and a brief summary of the basis for them, or if the expert is not retained by you, employed by you, or otherwise subject to your control, documents reflecting such information.

**RESPONSE:**

CITY OF ROYSE CITY'S REQUEST FOR DISCLOSURE TO VERANDAH COMMUNITIES, LP

SOAH DOCKET NOS. 582-04-0000 & 582-04-1268  
TCEQ DOCKET NOS. 2003-0737-UCR, 2003-0738-UCR, & 2003-1289-UCR

Rule 194.2(f) For any testifying expert:

- (4) If the expert is retained by, employed by, or otherwise subject to the control of the responding party:
  - (A) All documents, tangible things, reports, models or data compilations that have been provided to, reviewed by, or prepared by or for the expert in anticipation of the expert's testimony; and
  - (B) The expert's current resume and bibliography.


**RESPONSE:**

Rule 194.2(i) Any witness statements described in Rule 192.3(h).

**RESPONSE:**

Respectfully submitted,

**RUSSELL, MOORMAN & RODRIGUEZ, L.L.P.**  
 102 West Morrow Street, Suite 103  
 Georgetown, Texas 78626  
 (512) 930-1317  
 (512) 864-7744 (Fax)



KERRY E. RUSSELL  
 State Bar No. 17417820

ANGELA K. MOORMAN  
 State Bar No. 24007700

**ATTORNEYS FOR THE CITY OF ROYSE CITY,  
 TEXAS**

CITY OF ROYSE CITY'S REQUEST FOR DISCLOSURE TO VERANDAH COMMUNITIES, LP

SOAH DOCKET NOS. 582-04-0 & 582-04-1268  
 TCEQ DOCKET NOS. 2003-0737-UCR, 2003-0738-UCR, & 2003-1289-UCR

**CERTIFICATE OF SERVICE**

I hereby certify that on this the 12th day of January, 2004, a true and correct copy of the foregoing document has been sent via facsimile, first class mail, Federal Express overnight delivery, or hand delivery to the following:

<p>Mr. Geoffrey Kirshbaum                  Texas Commission on Environmental Quality                  MC-175                  P.O. Box 13087                  Austin, Texas 78711-3087 (mail)                  12100 Park 35 Circle, Building F                  Austin, Texas 78753 (delivery)                  Telephone: (512) 239-0600                  Fax: (512) 239-0606</p>	<p>Representing the Executive Director, Texas Commission on Environmental Quality</p>
<p>Mr. Blas Coy                  Office of the Public Interest Counsel                  Texas Commission on Environmental Quality                  MC-103                  P.O. Box 13087                  Austin, Texas 78711-3087 (mail)                  12100 Park 35 Circle, Building F                  Austin, Texas 78753 (delivery)                  Telephone: (512) 239-6363                  Fax: (512) 239-6377</p>	<p>Representing the Office of Public Interest Counsel, Texas Commission on Environmental Quality</p>
<p>Mr. Mark H. Zeppa                  Law Offices of Mark Zeppa, PC                  4833 Spicewood Springs Road #202                  Austin, Texas 78759-8436                  Telephone: (512) 346-4011                  Fax: (512) 346-6847</p>	<p>Representing:</p> <ul style="list-style-type: none"> <li>▪ Verandah Communities, LP</li> <li>▪ Verandah Freshwater Supply District</li> <li>▪ Parker Creek Estates, L.P.</li> </ul>
<p>Ms. Susan E. Potts                  Mr. David Klein                  Potts &amp; Reilly, L.L.P.                  Attorneys and Counselors                  401 West 15th Street, Suite 850                  Austin, Texas 78701-1665                  Telephone: (512) 469-7474                  Fax: (512) 469-7480</p>	<p>Representing Mr. Dean M. Gandy</p>

CITY OF ROYSE CITY'S REQUEST FOR DISCLOSURE TO VERANDAH COMMUNITIES, LP

SOAH DOCKET NOS. 582-04- & 582-04-1268  
 TCEQ DOCKET NOS. 2003-0737-UCR, 2003-0738-UCR, & 2003-1289-UCR

<p>Mr. Skip Newsom                  Attorney                  3724 Jefferson Street, Suite 200                  Austin, Texas 78731                  Telephone: (512) 477-4121                  Fax: (512) 477-2860</p>	<p>Representing the City of Fate, Texas</p>
<p>Ms. Amy Cortinas                  Utility Rates and Services Section                  Water Utilities Division – MC-153                  Texas Commission on Environmental Quality                  P.O. Box 13087                  Austin, Texas 78711-3087 (mail)                  12100 Park 35 Circle, Building F                  Austin, Texas 78753 (delivery)                  Telephone: (512) 239-6960                  Fax: (512) 239-6972</p>	<p>Texas Commission on Environmental Quality</p>
<p>Docket Clerk                  TCEQ Office of Chief Clerk (MC-105)                  P.O. Box 13087                  Austin, Texas 78711-3087 (mail)                  12100 Park 35 Circle, Building F                  Austin, Texas 78753 (delivery)                  Fax: (512) 239-3311</p>	

By:   
 ANGELA K. MOORMAN

CITY OF ROYSE CITY'S REQUEST FOR DISCLOSURE TO VERANDAH COMMUNITIES, LP





SOAH DOCKET NOS. 582-04-0 & 582-04-1268  
TCEQ DOCKET NOS. 2003-0737-UCR, 2003-0738-UCR, & 2003-1289-UCR

## A. DEFINITIONS

The following paragraphs state definitions that apply to this Request for Disclosure in its entirety, including the Instructions noted below:

- (1) "Royse City" refers to the City of Royse City, and each of its officers, employees, agents, representatives, attorneys, and all other natural persons, business or legal entities, presently or formerly acting in concert with, under the direct or indirect control of, or on behalf of Royse City.
- (2) "You," "your," and "Verandah FWSD" means Verandah Freshwater Supply District, its officers, employees, agents, representatives, attorneys, and all other natural persons, businesses or legal entities, presently or formerly, acting in concert with, under the direct or indirect control of, or on behalf of Verandah FWSD.
- (3) "Document(s)" means all written, typed, or printed matters, and all magnetic or other records, papers, or documentation of any kind or description (including, without limitation, letters, correspondence, telegrams, memoranda, notes, minutes, contracts, agreements, notations of telephone or in-person conversations, conferences, inter-office communications, e-mail, microfilm, bulletins, circulars, accounts, writings, drawings, graphs, charts, pamphlets, books, facsimiles, invoices, tape recordings, video recordings, photographs, computer printouts and work sheets), including all originals and all drafts and copies not identical to the originals, all photographs and graphic matter, however produced or reproduced, and all compilations of data from which information can be obtained, and any and all writings or recordings of any type or nature, whether or not prepared by you, in your actual possession, custody, or control, including those in the possession, custody, or control of any and all present or former directors, officers, employees, representatives, consultants, accountants, attorneys, agents, other natural persons, business or legal entities, presently or formerly acting in concert with, under the direct or indirect control of, or on behalf of Verandah FWSD.
- (4) "Describe" or "identify," when used in reference to a document, means you must state, to the fullest extent possible, the following:
  - (a) The nature (e.g., letter, handwritten note) of the document;
  - (b) The title or heading that appears on the document;
  - (c) The date of the document and the date of each addendum, supplement, or other addition or change;
  - (d) The identity of: the author of the document; any signatory(ies) to the document; and the person on whose behalf or at whose request or direction the document was prepared or delivered; and

CITY OF ROYSE CITY'S REQUEST FOR DISCLOSURE TO VERANDAH FRESHWATER SUPPLY DISTRICT

SOAH DOCKET NOS. 582-04-02, 582-04-1268  
TCEQ DOCKET NOS. 2003-0737-UCR, 2003-0738-UCR, & 2003-1289-UCR

- (e) The present location of the document, and the name, address, position or title, and telephone number(s) of the person(s) having custody of the document.
- (5) "Describe" or "identify," when used in reference to a natural person, means you must state, to the fullest extent possible, the following:
  - (a) The full name;
  - (b) The present or last known residential address, including zip code;
  - (c) The present or last known residential and office telephone number(s);
  - (d) The present or last known occupation, job title, employer, and employer's address, including zip code;
  - (e) The occupation, job title, employer, and employer's address at the time of the event or period referred to in each particular interrogatory; and
  - (f) In the case of any person other than an individual, identify the officer, employee, or agent most closely connected with the subject matter of the interrogatory, and the officer who is responsible for supervising that officer or employee.
- (6) "Communication" means any oral or written communication of which Verandah FWSD has knowledge, information, or belief.
- (7) "File" means any collection or group of documents maintained, held, stored, or used together, including, without limitation, all collections of documents maintained, held, or stored in folders, notebooks, or other devices for separating or organizing documents.
- (8) "Person(s)" means any natural person, corporation, firm, association, partnership, joint venture, proprietorship, governmental body, or any other organization, business, or legal entity, and all other predecessors or successors in interest.
- (9) "Concerning" means, in whole or in part, directly or indirectly, referring to, relating to, being connected with, commenting on, responding to, showing, describing, analyzing, reflecting, embodying, mentioning, or constituting the subject matter identified in the request.
- (10) "Date" means the exact day, month, and year, if ascertainable or, if not, the best approximation.
- (11) The word "and" means "and/or."
- (12) The word "or" means "or/and."

CITY OF ROYSE CITY'S REQUEST FOR DISCLOSURE TO VERANDAH FRESHWATER SUPPLY DISTRICT

**SOAH DOCKET NOS. 582-04-0253, 582-04-1268**  
**TCEQ DOCKET NOS. 2003-0737-UCR, 2003-0738-UCR, & 2003-1289-UCR**

- (13) "Royse City Sewer CCN Application" refers to the Application of the City of Royse City to Obtain a Sewer Certificate of Convenience and Necessity ("CCN") in Collin, Rockwall, and Hunt counties, Application No. 34277-C, Consolidated SOAH Docket Nos. 582-04-0253 and 582-04-1268, Consolidated TCEQ Docket Nos. 2003-0737-UCR, 2003-0738-UCR, and 2003-1289-UCR, pending before the Commission and/or SOAH and any and all information gathered, generated, compiled, or submitted to any other state or federal agency by or on behalf of Royse City related to Application No. 34277-C.
- (14) "Royse City Water CCN Application" refers to the Application of the City of Royse City to Amend Water CCN No. 12827 in Rockwall and Hunt counties, Application No. 34270-C, Consolidated SOAH Docket Nos. 582-04-0253 and 582-04-1268, Consolidated TCEQ Docket Nos. 2003-0737-UCR, 2003-0738-UCR, and 2003-1289-UCR, pending before the Commission and/or SOAH and any and all information gathered, generated, compiled, or submitted to any other state or federal agency by or on behalf of Royse City related to Application No. 34270-C.
- (15) "Verandah LP Sewer CCN Application" refers to the Application of Verandah Communities, LP to Obtain a Sewer CCN in Hunt and Rockwall counties, Application No. 34267-C, Consolidated SOAH Docket Nos. 582-04-0253 and 582-04-1268, Consolidated TCEQ Docket Nos. 2003-0737-UCR, 2003-0738-UCR, and 2003-1289-UCR, pending before the Commission and/or SOAH and any and all information gathered, generated, compiled, or submitted to any other state or federal agency by or on behalf of Verandah LP related to Application No. 34267-C.
- (16) "Parker Creek L.P. Sewer CCN Application" refers to the Application of Parker Creek Estates, L.P. to Obtain a Sewer CCN in Rockwall County, Application No. 34297-C, Consolidated SOAH Docket Nos. 582-04-0253 and 582-04-1268, Consolidated TCEQ Docket Nos. 2003-0737-UCR, 2003-0738-UCR, and 2003-1289-UCR, pending before the Commission and/or SOAH and any and all information gathered, generated, compiled, or submitted to any other state or federal agency by or on behalf of Parker Creek Estates, L.P. related to Application No. 34297-C.
- (17) "Parker Creek L.P. Water CCN Application" refers to the Application of Parker Creek Estates, L.P. to Obtain a Water CCN in Rockwall County, Application No. 34301-C, Consolidated SOAH Docket Nos. 582-04-0253 and 582-04-1268, Consolidated TCEQ Docket Nos. 2003-0737-UCR, 2003-0738-UCR, and 2003-1289-UCR, pending before the Commission and/or SOAH and any and all information gathered, generated, compiled, or submitted to any other state or federal agency by or on behalf of Parker Creek Estates, L.P. related to Application No. 34301-C.
- (18) All definitions found in Texas Administrative Code title 30, chapter 291 and Texas Water Code chapters 11 and 13 are incorporated herein, verbatim.

CITY OF ROYSE CITY'S REQUEST FOR DISCLOSURE TO VERANDAH FRESHWATER SUPPLY DISTRICT

SOAH DOCKET NOS. 582-04-00000 & 582-04-1268  
 TCEQ DOCKET NOS. 2003-0737-UCR, 2003-0738-UCR, & 2003-1289-UCR

## B. INSTRUCTIONS

- (1) You may not object to requests for disclosure.
- (2) For every document that no longer exists or cannot be located, or for any requested information about a document that no longer exists or cannot be located: identify the document; state how and when the document passed out of existence, or when it could no longer be located; state the reason(s) for the disappearance; identify each person having knowledge about the disposition or loss of the document; and identify each document evidencing the existence or nonexistence of each document that cannot be located.
- (3) It is requested that all documents that might impact on the subject matter of the Royse City Sewer CCN Application, the Royse City Water CCN Application, the Verandah LP Sewer CCN Application, the Parker Creek L.P. Sewer CCN Application, and/or the Parker Creek L.P. Water CCN Application be preserved and that any ongoing process of document destruction involving such documents cease.
- (4) Furnish all information available to you and known by you, or in your possession or that of your agents and attorneys, or appearing in your records.
- (5) In those instances when requested information or requested documents are stored only on software, computer based information, or other data compilations, you should either produce the raw data along with all codes and programs for translating it into usable form, or produce the information in a finished usable form that includes all necessary glossaries, keys, and indices for interpretation of the material.
- (6) You are under a duty to supplement your answers to these requests for disclosure that are incomplete or incorrect when made. Furthermore, you are under a duty to timely amend your answers if you obtain information on the basis of which you know that an answer either: (1) was incorrect or incomplete when made; or (2) although correct and complete when made, is no longer true and complete and the circumstances are such that failure to amend the answer is in substance misleading.

## C. REQUESTS FOR DISCLOSURE

Pursuant to TEX. R. CIV. P. 194, Verandah FWSD is requested to disclose, within twenty (20) days of service of this request, the information or material described in Rule 194.2.

**Rule 194.2(a)** The correct names of the parties to the lawsuit.

### RESPONSE:

CITY OF ROYSE CITY'S REQUEST FOR DISCLOSURE TO VERANDAH FRESHWATER SUPPLY DISTRICT

**SOAH DOCKET NOS. 582-04-02 582-04-1268**  
**TCEQ DOCKET NOS. 2003-0737-UCR, 2003-0738-UCR, & 2003-1289-UCR**

**Rule 194.2(c)** The legal theories and, in general, the factual bases of the responding party's claims or defenses.

**RESPONSE:**

**Rule 194.2(d)** The amount and any method of calculating economic damages.

**RESPONSE:**

**Rule 194.2(e)** The name, address, and telephone number of persons having knowledge of relevant facts, and a brief statement of each identified person's connection with the case.

**RESPONSE:**

**Rule 194.2(f)** For any testifying expert:

- (1) The expert's name, address, and telephone number.

**RESPONSE:**

**Rule 194.2(f)** For any testifying expert:

- (2) The subject matter on which the expert will testify.

**RESPONSE:**

**Rule 194.2(f)** For any testifying expert:

- (3) The general substance of the expert's mental impressions and opinions and a brief summary of the basis for them, or if the expert is not retained by you, employed by you, or otherwise subject to your control, documents reflecting such information.

**RESPONSE:**

CITY OF ROYSE CITY'S REQUEST FOR DISCLOSURE TO VERANDAH FRESHWATER SUPPLY DISTRICT

SOAH DOCKET NOS. 582-04-02, 582-04-1268  
TCEQ DOCKET NOS. 2003-0737-UCR, 2003-0738-UCR, & 2003-1289-UCR

Rule 194.2(f) For any testifying expert:

- (4) If the expert is retained by, employed by, or otherwise subject to the control of the responding party:
  - (A) All documents, tangible things, reports, models or data compilations that have been provided to, reviewed by, or prepared by or for the expert in anticipation of the expert's testimony; and
  - (B) The expert's current resume and bibliography.


RESPONSE:

Rule 194.2(i) Any witness statements described in Rule 192.3(h).

RESPONSE:

Respectfully submitted,

**RUSSELL, MOORMAN & RODRIGUEZ, L.L.P.**  
 102 West Morrow Street, Suite 103  
 Georgetown, Texas 78626  
 (512) 930-1317  
 (512) 864-7744 (Fax)



**KERRY E. RUSSELL**  
 State Bar No. 17417820

**ANGELA K. MOORMAN**  
 State Bar No. 24007700

**ATTORNEYS FOR THE CITY OF ROYSE CITY,  
 TEXAS**

CITY OF ROYSE CITY'S REQUEST FOR DISCLOSURE TO VERANDAH FRESHWATER SUPPLY DISTRICT

SOAH DOCKET NOS. 582-04-0000 & 582-04-1268  
 TCEQ DOCKET NOS. 2003-0737-UCR, 2003-0738-UCR, & 2003-1289-UCR

**CERTIFICATE OF SERVICE**

I hereby certify that on this the 12th day of January, 2004, a true and correct copy of the foregoing document has been sent via facsimile, first class mail, Federal Express overnight delivery, or hand delivery to the following:

<p>Mr. Geoffrey Kirshbaum                  Texas Commission on Environmental Quality                  MC-175                  P.O. Box 13087                  Austin, Texas 78711-3087 (mail)                  12100 Park 35 Circle, Building F                  Austin, Texas 78753 (delivery)                  Telephone: (512) 239-0600                  Fax: (512) 239-0606</p>	<p>Representing the Executive Director, Texas                  Commission on Environmental Quality</p>
<p>Mr. Blas Coy                  Office of the Public Interest Counsel                  Texas Commission on Environmental Quality                  MC-103                  P.O. Box 13087                  Austin, Texas 78711-3087 (mail)                  12100 Park 35 Circle, Building F                  Austin, Texas 78753 (delivery)                  Telephone: (512) 239-6363                  Fax: (512) 239-6377</p>	<p>Representing the Office of Public Interest                  Counsel, Texas Commission on Environmental                  Quality</p>
<p>Mr. Mark H. Zeppa                  Law Offices of Mark Zeppa, PC                  4833 Spicewood Springs Road #202                  Austin, Texas 78759-8436                  Telephone: (512) 346-4011                  Fax: (512) 346-6847</p>	<p>Representing:</p> <ul style="list-style-type: none"> <li>▪ Verandah Communities, LP</li> <li>▪ Verandah Freshwater Supply District</li> <li>▪ Parker Creek Estates, L.P.</li> </ul>
<p>Ms. Susan E. Potts                  Mr. David Klein                  Potts &amp; Reilly, L.L.P.                  Attorneys and Counselors                  401 West 15th Street, Suite 850                  Austin, Texas 78701-1665                  Telephone: (512) 469-7474                  Fax: (512) 469-7480</p>	<p>Representing Mr. Dean M. Gandy</p>

CITY OF ROYSE CITY'S REQUEST FOR DISCLOSURE TO VERANDAH FRESHWATER SUPPLY DISTRICT

SOAH DOCKET NOS. 582-04-0 & 582-04-1268  
 TCEQ DOCKET NOS. 2003-0737-UCR, 2003-0738-UCR, & 2003-1289-UCR

<p>Mr. Skip Newsom          Attorney          3724 Jefferson Street, Suite 200          Austin, Texas 78731          Telephone: (512) 477-4121          Fax: (512) 477-2860</p>	<p>Representing the City of Fate, Texas</p>
<p>Ms. Amy Cortinas          Utility Rates and Services Section          Water Utilities Division – MC-153          Texas Commission on Environmental Quality          P.O. Box 13087          Austin, Texas 78711-3087 (mail)          12100 Park 35 Circle, Building F          Austin, Texas 78753 (delivery)          Telephone: (512) 239-6960          Fax: (512) 239-6972</p>	<p>Texas Commission on Environmental Quality</p>
<p>Docket Clerk          TCEQ Office of Chief Clerk (MC-105)          P.O. Box 13087          Austin, Texas 78711-3087 (mail)          12100 Park 35 Circle, Building F          Austin, Texas 78753 (delivery)          Fax: (512) 239-3311</p>	

By:

  
 ANGELA K. MOORMAN

CITY OF ROYSE CITY'S REQUEST FOR DISCLOSURE TO VERANDAH FRESHWATER SUPPLY DISTRICT





SOAH DOCKET NOS. 582-04-02 582-04-1268  
TCEQ DOCKET NOS. 2003-0737-UCR, 2003-0738-UCR, & 2003-1289-UCR

## A. DEFINITIONS

The following paragraphs state definitions that apply to this Request for Disclosure in its entirety, including the Instructions noted below:

- (1) "Royse City" refers to the City of Royse City, and each of its officers, employees, agents, representatives, attorneys, and all other natural persons, business or legal entities, presently or formerly acting in concert with, under the direct or indirect control of, or on behalf of Royse City.
- (2) "You," "your," and "Parker Creek L.P." means Parker Creek Estates, L.P., its officers, employees, agents, representatives, attorneys, and all other natural persons, businesses or legal entities, presently or formerly, acting in concert with, under the direct or indirect control of, or on behalf of Parker Creek L.P.
- (3) "Document(s)" means all written, typed, or printed matters, and all magnetic or other records, papers, or documentation of any kind or description (including, without limitation, letters, correspondence, telegrams, memoranda, notes, minutes, contracts, agreements, notations of telephone or in-person conversations, conferences, inter-office communications, e-mail, microfilm, bulletins, circulars, accounts, writings, drawings, graphs, charts, pamphlets, books, facsimiles, invoices, tape recordings, video recordings, photographs, computer printouts and work sheets), including all originals and all drafts and copies not identical to the originals, all photographs and graphic matter, however produced or reproduced, and all compilations of data from which information can be obtained, and any and all writings or recordings of any type or nature, whether or not prepared by you, in your actual possession, custody, or control, including those in the possession, custody, or control of any and all present or former directors, officers, employees, representatives, consultants, accountants, attorneys, agents, other natural persons, business or legal entities, presently or formerly acting in concert with, under the direct or indirect control of, or on behalf of Parker Creek L.P.
- (4) "Describe" or "identify," when used in reference to a document, means you must state, to the fullest extent possible, the following:
  - (a) The nature (e.g., letter, handwritten note) of the document;
  - (b) The title or heading that appears on the document;
  - (c) The date of the document and the date of each addendum, supplement, or other addition or change;
  - (d) The identity of: the author of the document; any signatory(ies) to the document; and the person on whose behalf or at whose request or direction the document was prepared or delivered; and

CITY OF ROYSE CITY'S REQUEST FOR DISCLOSURE TO PARKER CREEK ESTATES, L.P.

SOAH DOCKET NOS. 582-04-02 & 582-04-1268  
TCEQ DOCKET NOS. 2003-0737-UCR, 2003-0738-UCR, & 2003-1289-UCR

- (e) The present location of the document, and the name, address, position or title, and telephone number(s) of the person(s) having custody of the document.
- (5) "Describe" or "identify," when used in reference to a natural person, means you must state, to the fullest extent possible, the following:
- (a) The full name;
  - (b) The present or last known residential address, including zip code;
  - (c) The present or last known residential and office telephone number(s);
  - (d) The present or last known occupation, job title, employer, and employer's address, including zip code;
  - (e) The occupation, job title, employer, and employer's address at the time of the event or period referred to in each particular interrogatory; and
  - (f) In the case of any person other than an individual, identify the officer, employee, or agent most closely connected with the subject matter of the interrogatory, and the officer who is responsible for supervising that officer or employee.
- (6) "Communication" means any oral or written communication of which Parker Creek L.P. has knowledge, information, or belief.
- (7) "File" means any collection or group of documents maintained, held, stored, or used together, including, without limitation, all collections of documents maintained, held, or stored in folders, notebooks, or other devices for separating or organizing documents.
- (8) "Person(s)" means any natural person, corporation, firm, association, partnership, joint venture, proprietorship, governmental body, or any other organization, business, or legal entity, and all other predecessors or successors in interest.
- (9) "Concerning" means, in whole or in part, directly or indirectly, referring to, relating to, being connected with, commenting on, responding to, showing, describing, analyzing, reflecting, embodying, mentioning, or constituting the subject matter identified in the request.
- (10) "Date" means the exact day, month, and year, if ascertainable or, if not, the best approximation.
- (11) The word "and" means "and/or."
- (12) The word "or" means "or/and."

CITY OF ROYSE CITY'S REQUEST FOR DISCLOSURE TO PARKER CREEK ESTATES, L.P.

SOAH DOCKET NOS. 582-04-0253 & 582-04-1268  
TCEQ DOCKET NOS. 2003-0737-UCR, 2003-0738-UCR, & 2003-1289-UCR

- (13) "Royse City Sewer CCN Application" refers to the Application of the City of Royse City to Obtain a Sewer Certificate of Convenience and Necessity ("CCN") in Collin, Rockwall, and Hunt counties, Application No. 34277-C, Consolidated SOAH Docket Nos. 582-04-0253 and 582-04-1268, Consolidated TCEQ Docket Nos. 2003-0737-UCR, 2003-0738-UCR, and 2003-1289-UCR, pending before the Commission and/or SOAH and any and all information gathered, generated, compiled, or submitted to any other state or federal agency by or on behalf of Royse City related to Application No. 34277-C.
- (14) "Royse City Water CCN Application" refers to the Application of the City of Royse City to Amend Water CCN No. 12827 in Rockwall and Hunt counties, Application No. 34270-C, Consolidated SOAH Docket Nos. 582-04-0253 and 582-04-1268, Consolidated TCEQ Docket Nos. 2003-0737-UCR, 2003-0738-UCR, and 2003-1289-UCR, pending before the Commission and/or SOAH and any and all information gathered, generated, compiled, or submitted to any other state or federal agency by or on behalf of Royse City related to Application No. 34270-C.
- (15) "Verandah LP Sewer CCN Application" refers to the Application of Verandah Communities, LP to Obtain a Sewer CCN in Hunt and Rockwall counties, Application No. 34267-C, Consolidated SOAH Docket Nos. 582-04-0253 and 582-04-1268, Consolidated TCEQ Docket Nos. 2003-0737-UCR, 2003-0738-UCR, and 2003-1289-UCR, pending before the Commission and/or SOAH and any and all information gathered, generated, compiled, or submitted to any other state or federal agency by or on behalf of Verandah LP related to Application No. 34267-C.
- (16) "Parker Creek L.P. Sewer CCN Application" refers to the Application of Parker Creek Estates, L.P. to Obtain a Sewer CCN in Rockwall County, Application No. 34297-C, Consolidated SOAH Docket Nos. 582-04-0253 and 582-04-1268, Consolidated TCEQ Docket Nos. 2003-0737-UCR, 2003-0738-UCR, and 2003-1289-UCR, pending before the Commission and/or SOAH and any and all information gathered, generated, compiled, or submitted to any other state or federal agency by or on behalf of Parker Creek Estates, L.P. related to Application No. 34297-C.
- (17) "Parker Creek L.P. Water CCN Application" refers to the Application of Parker Creek Estates, L.P. to Obtain a Water CCN in Rockwall County, Application No. 34301-C, Consolidated SOAH Docket Nos. 582-04-0253 and 582-04-1268, Consolidated TCEQ Docket Nos. 2003-0737-UCR, 2003-0738-UCR, and 2003-1289-UCR, pending before the Commission and/or SOAH and any and all information gathered, generated, compiled, or submitted to any other state or federal agency by or on behalf of Parker Creek Estates, L.P. related to Application No. 34301-C.
- (18) All definitions found in Texas Administrative Code title 30, chapter 291 and Texas Water Code chapters 11 and 13 are incorporated herein, verbatim.

CITY OF ROYSE CITY'S REQUEST FOR DISCLOSURE TO PARKER CREEK ESTATES, L.P.

SOAH DOCKET NOS. 582-04-02 582-04-1268  
TCEQ DOCKET NOS. 2003-0737-UCR, 2003-0738-UCR, & 2003-1289-UCR

## B. INSTRUCTIONS

- (1) You may not object to requests for disclosure.
- (2) For every document that no longer exists or cannot be located, or for any requested information about a document that no longer exists or cannot be located: identify the document; state how and when the document passed out of existence, or when it could no longer be located; state the reason(s) for the disappearance; identify each person having knowledge about the disposition or loss of the document; and identify each document evidencing the existence or nonexistence of each document that cannot be located.
- (3) It is requested that all documents that might impact on the subject matter of the Royse City Sewer CCN Application, the Royse City Water CCN Application, the Verandah LP Sewer CCN Application, the Parker Creek L.P. Sewer CCN Application, and/or the Parker Creek L.P. Water CCN Application be preserved and that any ongoing process of document destruction involving such documents cease.
- (4) Furnish all information available to you and known by you, or in your possession or that of your agents and attorneys, or appearing in your records.
- (5) In those instances when requested information or requested documents are stored only on software, computer based information, or other data compilations, you should either produce the raw data along with all codes and programs for translating it into usable form, or produce the information in a finished usable form that includes all necessary glossaries, keys, and indices for interpretation of the material.
- (6) You are under a duty to supplement your answers to these requests for disclosure that are incomplete or incorrect when made. Furthermore, you are under a duty to timely amend your answers if you obtain information on the basis of which you know that an answer either: (1) was incorrect or incomplete when made; or (2) although correct and complete when made, is no longer true and complete and the circumstances are such that failure to amend the answer is in substance misleading.

## C. REQUESTS FOR DISCLOSURE

Pursuant to TEX. R. CIV. P. 194, Parker Creek L.P. is requested to disclose, within twenty (20) days of service of this request, the information or material described in Rule 194.2.

**Rule 194.2(a)** The correct names of the parties to the lawsuit.

### RESPONSE:

CITY OF ROYSE CITY'S REQUEST FOR DISCLOSURE TO PARKER CREEK ESTATES, L.P.

SOAH DOCKET NOS. 582-04-02 & 582-04-1268  
TCEQ DOCKET NOS. 2003-0737-UCR, 2003-0738-UCR, & 2003-1289-UCR

**Rule 194.2(c)** The legal theories and, in general, the factual bases of the responding party's claims or defenses.

**RESPONSE:**

**Rule 194.2(d)** The amount and any method of calculating economic damages.

**RESPONSE:**

**Rule 194.2(e)** The name, address, and telephone number of persons having knowledge of relevant facts, and a brief statement of each identified person's connection with the case.

**RESPONSE:**

**Rule 194.2(f)** For any testifying expert:

- (1) The expert's name, address, and telephone number.

**RESPONSE:**

**Rule 194.2(f)** For any testifying expert:

- (2) The subject matter on which the expert will testify.

**RESPONSE:**

**Rule 194.2(f)** For any testifying expert:

- (3) The general substance of the expert's mental impressions and opinions and a brief summary of the basis for them, or if the expert is not retained by you, employed by you, or otherwise subject to your control, documents reflecting such information.

**RESPONSE:**

CITY OF ROYSE CITY'S REQUEST FOR DISCLOSURE TO PARKER CREEK ESTATES, L.P.

SOAH DOCKET NOS. 582-04-02, 582-04-1268  
TCEQ DOCKET NOS. 2003-0737-UCR, 2003-0738-UCR, & 2003-1289-UCR

**Rule 194.2(f)** For any testifying expert:

- (4) If the expert is retained by, employed by, or otherwise subject to the control of the responding party:
  - (A) All documents, tangible things, reports, models or data compilations that have been provided to, reviewed by, or prepared by or for the expert in anticipation of the expert's testimony; and
  - (B) The expert's current resume and bibliography.

**RESPONSE:**

**Rule 194.2(i)** Any witness statements described in Rule 192.3(h).

**RESPONSE:**

Respectfully submitted,

**RUSSELL, MOORMAN & RODRIGUEZ, L.L.P.**  
102 West Morrow Street, Suite 103  
Georgetown, Texas 78626  
(512) 930-1317  
(512) 864-7744 (Fax)

  
**KERRY E. RUSSELL**  
State Bar No. 17417820

**ANGELA K. MOORMAN**  
State Bar No. 24007700

**ATTORNEYS FOR THE CITY OF ROYSE CITY,  
TEXAS**

CITY OF ROYSE CITY'S REQUEST FOR DISCLOSURE TO PARKER CREEK ESTATES, L.P.

SOAH DOCKET NOS. 582-04-0 & 582-04-1268  
 TCEQ DOCKET NOS. 2003-0737-UCR, 2003-0738-UCR, & 2003-1289-UCR

### CERTIFICATE OF SERVICE

I hereby certify that on this the 12th day of January, 2004, a true and correct copy of the foregoing document has been sent via facsimile, first class mail, Federal Express overnight delivery, or hand delivery to the following:

<p>Mr. Geoffrey Kirshbaum          Texas Commission on Environmental Quality          MC-175          P.O. Box 13087          Austin, Texas 78711-3087 (mail)          12100 Park 35 Circle, Building F          Austin, Texas 78753 (delivery)          Telephone: (512) 239-0600          Fax: (512) 239-0606</p>	<p>Representing the Executive Director, Texas          Commission on Environmental Quality</p>
<p>Mr. Blas Coy          Office of the Public Interest Counsel          Texas Commission on Environmental Quality          MC-103          P.O. Box 13087          Austin, Texas 78711-3087 (mail)          12100 Park 35 Circle, Building F          Austin, Texas 78753 (delivery)          Telephone: (512) 239-6363          Fax: (512) 239-6377</p>	<p>Representing the Office of Public Interest          Counsel, Texas Commission on Environmental          Quality</p>
<p>Mr. Mark H. Zeppa          Law Offices of Mark Zeppa, PC          4833 Spicewood Springs Road #202          Austin, Texas 78759-8436          Telephone: (512) 346-4011          Fax: (512) 346-6847</p>	<p>Representing:</p> <ul style="list-style-type: none"> <li>▪ Verandah Communities, LP</li> <li>▪ Verandah Freshwater Supply District</li> <li>▪ Parker Creek Estates, L.P.</li> </ul>
<p>Ms. Susan E. Potts          Mr. David Klein          Potts &amp; Reilly, L.L.P.          Attorneys and Counselors          401 West 15th Street, Suite 850          Austin, Texas 78701-1665          Telephone: (512) 469-7474          Fax: (512) 469-7480</p>	<p>Representing Mr. Dean M. Gandy</p>

CITY OF ROYSE CITY'S REQUEST FOR DISCLOSURE TO PARKER CREEK ESTATES, L.P.



SOAH DOCKET NOS. 582-04-0 & 582-04-1268  
 TCEQ DOCKET NOS. 2003-0737-UCR, 2003-0738-UCR, & 2003-1289-UCR

<p>Mr. Skip Newsom          Attorney          3724 Jefferson Street, Suite 200          Austin, Texas 78731          Telephone: (512) 477-4121          Fax: (512) 477-2860</p>	<p>Representing the City of Fate, Texas</p>
<p>Ms. Amy Cortinas          Utility Rates and Services Section          Water Utilities Division – MC-153          Texas Commission on Environmental Quality          P.O. Box 13087          Austin, Texas 78711-3087 (mail)          12100 Park 35 Circle, Building F          Austin, Texas 78753 (delivery)          Telephone: (512) 239-6960          Fax: (512) 239-6972</p>	<p>Texas Commission on Environmental Quality</p>
<p>Docket Clerk          TCEQ Office of Chief Clerk (MC-105)          P.O. Box 13087          Austin, Texas 78711-3087 (mail)          12100 Park 35 Circle, Building F          Austin, Texas 78753 (delivery)          Fax: (512) 239-3311</p>	

By:

  
 ANGELA K. MOORMAN

CITY OF ROYSE CITY'S REQUEST FOR DISCLOSURE TO PARKER CREEK ESTATES, L.P.

