

SOAH DOCKET NOS. 582-04-023, 582-04-1268
TCEQ DOCKET NOS. 2003-0737-UCR, 2003-0738-UCR, & 2003-1289-UCR

INTERROGATORY NO. 5:

Identify the property development schedule for the areas identified in the Parker Creek L.P. Water CCN Application and the Parker Creek L.P. Sewer CCN Application.

ANSWER:

INTERROGATORY NO. 6:

Identify the projected retail rates, for both water and sewer services, anticipated to be charged by Parker Creek L.P. for the area identified in the Parker Creek L.P. Sewer CCN Application and the Parker Creek L.P. Water CCN Application.

ANSWER:

INTERROGATORY NO. 7:

Identify the specific boundaries and limits of the area included within the district boundaries of the proposed Parker Creek Municipal Utility District.

ANSWER:

INTERROGATORY NO. 8:

Identify all sources of potable water which Parker Creek L.P. anticipates utilizing to provide water service within the area identified in the Parker Creek L.P. Water CCN Application.

ANSWER:

INTERROGATORY NO. 9:

Identify the schedule pursuant to which Parker Creek L.P. anticipates providing water service with the area identified in the Parker Creek L.P. Water CCN Application.

ANSWER:

CITY OF ROYSE CITY'S FIRST SET OF INTERROGATORIES AND FIRST SET OF REQUESTS FOR PRODUCTION 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

INTERROGATORY NO. 10:

Identify the schedule pursuant to which Parker Creek L.P. anticipates providing wastewater treatment services within the area identified in the Parker Creek L.P. Sewer CCN Application.

ANSWER:

D. REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1:

Produce all documents identified in Parker Creek L.P.'s answers to Royse City's First Set of Interrogatories.

RESPONSE:

REQUEST FOR PRODUCTION NO. 2:

Produce all documents and tangible things, including, but not limited to, all reports, working papers, notes, calculations, diagrams, photographs, physical models, exhibits, compilations of data, drafts, treatises, rules, regulations, guidelines, statutes, policies, procedures, authoritative materials, or other materials prepared by or reviewed by each fact witness and expert you expect to call to testify during the Hearing on the Merits in this consolidated docket proceeding, and by each consulting expert whose work has been reviewed by a testifying expert.

RESPONSE:

REQUEST FOR PRODUCTION NO. 3:

For each expert you expect to call to testify during the Hearing on the Merits in this consolidated docket proceeding, and for each consulting expert whose opinions or observations a testifying expert will review or has reviewed, produce a curriculum vitae, a list of all cases in which the expert has testified either by deposition or live at trial or hearing, and a list of all articles or publications by the expert.

RESPONSE:

CITY OF ROYSE CITY'S FIRST SET OF INTERROGATORIES AND FIRST SET OF REQUESTS FOR PRODUCTION 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

REQUEST FOR PRODUCTION NO. 4:

Produce all billing and fee related documents, including, but not limited to, all invoices, bills, or other billing materials for each expert you expect to testify during the Hearing on the Merits in this consolidated docket proceeding, and for each consulting expert whose opinions or observations a testifying expert will review or has reviewed.

RESPONSE:

REQUEST FOR PRODUCTION NO. 5:

For each person you expect to call as a fact witness during the Hearing on the Merits in this consolidated docket proceeding, please produce each and every document that has been reviewed by the witness regarding 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.

RESPONSE:

REQUEST FOR PRODUCTION NO. 6:

Produce all agreements for settlement, indemnification, compromise, guarantee, or any other kind of agreement, which you have entered into with any party, or non-party, as a result of, concerning, or relating to 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.

RESPONSE:

REQUEST FOR PRODUCTION NO. 7:

Produce all documents and tangible things, including, but not limited to, all reports, working papers, notes, calculations, diagrams, photographs, physical models, exhibits, compilations of data, drafts, treatises, rules, regulations, guidelines, statutes, policies, procedures, authoritative materials, or other materials prepared by you or for you, submitted by you, for you, or to you, or reviewed by you or for you relating to or concerning 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.

RESPONSE:

CITY OF ROYSE CITY'S FIRST SET OF INTERROGATORIES AND FIRST SET OF REQUESTS FOR PRODUCTION TO PARKER CREEK ESTATES, L.P.

SOAH DOCKET NOS. 582-04-025 & 582-04-1268
TCEQ DOCKET NOS. 2003-0737-UCR, 2003-0738-UCR, & 2003-1289-UCR

REQUEST FOR PRODUCTION NO. 8:

Produce all documents relating to or concerning any and all investigations made by or for you regarding 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, including, but not limited to, documents identifying the person who initially requested that the investigation be undertaken, the dates on which the investigation was initiated and completed, all persons who were responsible for conducting the investigation, all persons who did any work whatsoever in connection with the investigation, every person interviewed or contacted in any manner with regard to the investigation, the current custodian(s) of any written statement or recording, and the date and substance of any oral communication.

RESPONSE:

CITY OF ROYSE CITY'S FIRST SET OF INTERROGATORIES AND FIRST SET OF REQUESTS FOR PRODUCTION 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

REQUEST FOR PRODUCTION NO. 9:

Produce all documents relating to or concerning 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, including, but not limited to, all correspondence, notes of telephone conferences or other oral communications, meeting notes, agendas, notices, letters, statements, or any other documents evidencing or relating to communications, whether written or oral, between you and any of the following entities:

- (a) any municipal agency;
- (b) any county agency;
- (c) any state agency;
- (d) any federal agency;
- (e) any testifying or consulting expert;
- (f) any party to this proceeding;
- (g) any elected official;
- (h) any representative(s), agent, or affiliate of any individual or business entity that provides any type of wastewater services; and
- (i) any representative(s), agent, or affiliate of any individual or business entity that provides any type of water services.

RESPONSE:

REQUEST FOR PRODUCTION NO. 10:

Produce all documents relating to or concerning your position against the Royse City Sewer CCN Application and the Royse City Water CCN Application prepared by you or for you, submitted by you or for you or to you, or reviewed by you or for you.

RESPONSE:

CITY OF ROYSE CITY'S FIRST SET OF INTERROGATORIES AND FIRST SET OF REQUESTS FOR PRODUCTION 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

REQUEST FOR PRODUCTION NO. 11:

Produce all documents relating to or concerning your position with regard to the Verandah LP Sewer CCN Application prepared by you or for you, submitted by you or for you or to you, or reviewed by you or for you.

RESPONSE:

REQUEST FOR PRODUCTION NO. 12:

Produce all documents relating to or concerning your position in support of the Parker Creek L.P. Sewer CCN Application and the Parker Creek L.P. Water CCN Application prepared by you or for you, submitted by you or for you or to you, or reviewed by you or for you.

RESPONSE:

REQUEST FOR PRODUCTION NO. 13:

Produce all documents that you will or may use or introduce as exhibits during the Hearing on the Merits in this consolidated docket proceeding.

RESPONSE:

REQUEST FOR PRODUCTION NO. 14:

Produce all documents relating to or concerning the agreement under which you have engaged the services of your fact witnesses, consultants, and expert witnesses in this consolidated docket proceeding.

RESPONSE:

REQUEST FOR PRODUCTION NO. 15:

Produce all documents relating to or concerning each and every meeting held by or for Parker Creek L.P., including, but not limited to, meeting notices, agendas, minutes, and sign-in sheets.

RESPONSE:

CITY OF ROYSE CITY'S FIRST SET OF INTERROGATORIES AND FIRST SET OF REQUESTS FOR PRODUCTION 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

REQUEST FOR PRODUCTION NO. 16:

Produce all documents created by, received by, or distributed by you relating to or concerning 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, including, but not limited to, any press release, public relation document, letter to the editor, newspaper article, flyer, information sheet, or background material.

RESPONSE:

REQUEST FOR PRODUCTION NO. 17:

Produce all documents concerning or relating to Parker Creek L.P.'s corporate structure, organization, and operation, including, but not limited to, by-laws, rules, regulations, declarations, articles of incorporation, articles of amendment, and qualifications for membership.

RESPONSE:

REQUEST FOR PRODUCTION NO. 18:

With respect to all preliminary, final, or other written reports of any kind prepared by or for you, any other person, or entity, concerning or relating to 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, please identify the person who currently has custody of each report along with the date and author of each report.

RESPONSE:

REQUEST FOR PRODUCTION NO. 19:

Produce any and all documents purporting to give you authority to participate in this proceeding.

RESPONSE:

CITY OF ROYSE CITY'S FIRST SET OF INTERROGATORIES AND FIRST SET OF REQUESTS FOR PRODUCTION 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

REQUEST FOR PRODUCTION NO. 20:

Produce any and all documents related to the delivery, by purchase or dedication, with any person or entity, of any easements.

RESPONSE:

REQUEST FOR PRODUCTION NO. 21:

Produce any and all documents that show the boundaries and limits of the proposed Parker Creek Municipal Utility District.

RESPONSE:

REQUEST FOR PRODUCTION NO. 22:

Produce all documents relating to or concerning each and every meeting held by or for the proposed Parker Creek Municipal Utility District, including, but not limited to, meeting notices, agendas, minutes, and sign-in sheets.

RESPONSE:

REQUEST FOR PRODUCTION NO. 23:

Produce all documents concerning or relating to the proposed Parker Creek Municipal Utility District's corporate structure, organization, and operation, including, but not limited to, applications, petitions, by-laws, rules, regulations, declarations, articles of incorporation, articles of amendment, and qualifications for membership.

RESPONSE:

REQUEST FOR PRODUCTION NO. 24:

Produce all documents concerning or relating to the current and proposed relationship between Parker Creek L.P. and the proposed Parker Creek Municipal Utility District.

RESPONSE:

CITY OF ROYSE CITY'S FIRST SET OF INTERROGATORIES AND FIRST SET OF REQUESTS FOR PRODUCTION 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

REQUEST FOR PRODUCTION NO. 25:

Produce all documents concerning or relating to the application for creation of the proposed Parker Creek Municipal Utility District.

RESPONSE:

REQUEST FOR PRODUCTION NO. 26:

Produce all documents concerning or relating to plans for the proposed Parker Creek Municipal Utility District to provide water and/or sewer services in the areas identified in the Parker Creek L.P. Sewer CCN Application and the Parker Creek L.P. Water CCN Application.

RESPONSE:

REQUEST FOR PRODUCTION NO. 27:

Produce all documents, including, but not limited to contracts, agreements, and correspondence, related to all sources of potable water which Parker Creek L.P. anticipates utilizing to provide water service within the area identified in the Parker Creek L.P. Water CCN Application.

RESPONSE:

REQUEST FOR PRODUCTION NO. 28:

Produce all documents identifying how Parker Creek L.P. anticipates providing wastewater treatment services to the area identified in the Parker Creek L.P. Sewer CCN Application.

RESPONSE:

REQUEST FOR PRODUCTION NO. 29:

Produce all documents identifying and/or supporting the schedules pursuant to which Parker Creek L.P. anticipates being able to provide water service within the area identified in the Parker Creek L.P. Water CCN Application.

RESPONSE:

CITY OF ROYSE CITY'S FIRST SET OF INTERROGATORIES AND FIRST SET OF REQUESTS FOR PRODUCTION 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

REQUEST FOR PRODUCTION NO. 30:

Produce all documents identifying and/or supporting the schedules pursuant to which Parker Creek L.P. anticipates being able to provide wastewater service within the area identified in the Parker Creek L.P. Sewer CCN Application.

RESPONSE:

CITY OF ROYSE CITY'S FIRST SET OF INTERROGATORIES AND FIRST SET OF REQUESTS FOR PRODUCTION TO PARKER CREEK ESTATES, L.P.

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Comments: City of Royse City's First Set of Interrogatories and First Requests for Production, *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.

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