

Control Number: 45870



Item Number: 122

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**SOAH DOCKET NO. 473-16-4619.WS**  
**PUC DOCKET NO. 45870**

<b>FORMAL COMPLAINT OF</b>	§	<b>BEFORE THE STATE OFFICE OF</b>
<b>ADC WEST RIDGE, L.P. AND</b>	§	<b>ADMINISTRATIVE HEARINGS</b>
<b>CENTER FOR HOUSING RESOURCES,</b>	§	
<b>INC. AGAINST THE CITY OF FRISCO</b>	§	

**CITY OF FRISCO'S RESPONSES TO ADC WEST RIDGE, L.P., AND CENTER FOR  
HOUSING RESOURCES, INC.'S CERTAIN REQUESTS FOR INFORMATION IN  
COMPLAINANTS' THIRD RFI REQUEST PURSUANT TO ORDER NO. 7 AND  
SUPPLEMENTAL RESPONSE TO THE SECOND SET OF RFIs**

COMES NOW the City of Frisco ("City" or "Frisco") and files this Response to Certain Requests in the Third Set of Requests for Information ("RFI") of ADC West Ridge, LP and Center for Housing Resources, Inc. ("Complainants") pursuant to Order No. 7 and Supplemental Response to the Complainants Second Set of RFIs. These responses may be treated as if filed under oath.

Respectfully submitted,

**Russell & Rodriguez, L.L.P.**  
1633 Williams Drive, Building 2, Suite 200  
Georgetown, Texas 78628  
(512) 930-1317  
(866) 929-1641 (Fax)

**Abernathy Roeder Boyd & Hullett, P.C.**

Richard Abernathy  
State Bar No. 00809500  
1700 Redbud Blvd., Suite 300  
McKinney, Texas 75069  
(214) 544-4000  
(214) 544-4040 (Fax)

\_\_\_\_\_  
/s/ Arturo D. Rodriguez, Jr.  
ARTURO D. RODRIGUEZ, JR.  
State Bar No. 00791551

**ATTORNEYS FOR THE CITY OF FRISCO**

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**Request for Information No. 23:** Please produce all ordinances, tariffs, schedules of rates, and/or service policies and regulations which Frisco contends apply to extensions of water and/or sewer service within Frisco’s water CCN No. 11772 and sewer CCN No. 20591, outside of Frisco’s corporate limits and within Frisco’s extraterritorial jurisdiction.

**Response:** See additional documents provided on the attached CD-ROM disk. The disk contains the complete Subdivision Ordinance of the City of Frisco and the City’s Engineering Standards.

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**Request for Information No. 71:** Please produce a map identifying the location of the Rowlett Sanitary Sewer Interceptor Line and the location of the City of Frisco’s metering station and tap as described in the Interlocal Agreement attached as Exhibit "B" hereto.

**Response:** See document provided on the attached CD-ROM disk.

Prepared/sponsored by: To be supplemented

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**Request for Information No. 72:** Please produce a map identifying the location of the City of Frisco's Point or Points of Delivery as defined in Section 6 of the water supply agreement attached hereto as Exhibit "C."

**Response:** See document provided on the attached CD-ROM disk.

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**Request for Information No. 73:** Please produce all documents relating to any agreement currently in effect between Frisco and any other person or entity which relates to the sharing of, or provides authorization for use of any water lines.

**Response:**     None.

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**Request for Information No. 74:** Please produce all documents identifying Frisco's existing water lines, whether located within Frisco's CCN or outside. For purposes of this request, Frisco's "existing water lines" means any lines for which Frisco owns, operates, has authorization to use, or any portion is reserved to serve Frisco's needs, for provision of water service.

**Response:** See map produced in response to RFI No. 72.

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**Request for Information No. 75:** Please produce all documents identifying Frisco's existing sewer lines, whether located within Frisco's CCN or outside. For purposes of this request, Frisco's "existing sewer lines" means any lines for which Frisco owns, operates, has authorization, to use, or any portion is reserved to serve Frisco's needs, for provision of sewer service.

**Response:** See map produced in response to RFI No. 71.

Prepared/sponsored by: To be supplemented



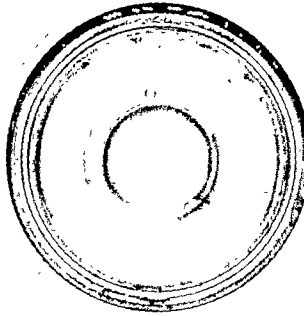
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**Formal Complaint of ADC West Ridge, L.P. and Center  
for Housing Resources, Inc, Against the City of Frisco**

City of Frisco's Responses to ADC West Ridge L.P., and Center for  
Housing Resources, Inc.'s Certain RFIs in Complainants' Third RFI  
pursuant to Order No. 7 and Supplemental Response to Second Set of RFIs

**R&R**



Phone:  
(512) 930-1317  
Fax:  
(866) 929-1641

Russell & Rodriguez, LLP  
1633 Williams Drive, Bldg. 2, Suite 200  
Georgetown, Texas 78628

## CERTIFICATE OF SERVICE

I hereby certify that on this 9<sup>th</sup> day of January, 2017, a true and correct copy of the foregoing document has been sent via electronic mail, facsimile, first class mail, or hand-delivered to the following counsel of record:

Mr. Sam Chang  
Public Utility Commission of Texas  
1701 N. Congress Avenue  
Austin, Texas  
(512) 936-7261  
(512) 936-7268 Fax

Mr. Leonard Dougal  
Mr. Ali Abazari  
Ms. Mallory Beck  
Jackson Walker, LLP  
100 Congress Avenue, Suite 1100  
Austin, Texas 78701  
(512) 236-2233  
(512) 391-2112 Fax

/s/ Arturo D. Rodríguez, Jr.

ARTURO D. RODRIGUEZ, JR.