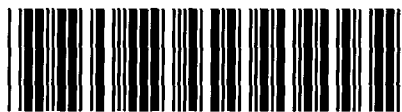




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FORMAL COMPLAINT OF  
ADC WEST RIDGE, L.P. AND  
CENTER FOR HOUSING  
RESOURCES, INC. AGAINST THE  
CITY OF FRISCO

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BEFORE THE STATE OFFICE  
PUBLIC UTILITY COMMISSION  
FILING CLERK  
OF  
ADMINISTRATIVE HEARINGS

**ADC WEST RIDGE, L.P. AND**  
**CENTER FOR HOUSING RESOURCES, INC.'S RESPONSES TO**  
**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION**  
**STAFF RFI NOS. 2-1 THROUGH 2-5**

ADC West Ridge, L.P. and Center for Housing Resources, Inc. file these Responses to Commission Staff's Second Request for Information to ADC West, L.P. and Center for Housing Resources, Inc. Staff RFI Nos. 2-1 through 2-5 ("STAFF RFI"), which was filed with the Public Utility Commission of Texas and served on ADC West Ridge, L.P. and Center for Housing Resources, Inc. on December 30, 2016. These responses are timely filed. ADC West Ridge, L.P. and Center for Housing Resources, Inc. ("Complainants") agree and stipulate that all parties may treat these responses as if the answers were filed under oath.

Respectfully submitted,

JACKSON WALKER L.L.P.

By: /s/ Mallory Beck

Leonard Dougal - State Bar No. 06031400

Ali Abazari - State Bar No. 00796094

Mallory Beck - State Bar No. 24073899

100 Congress, Suite 1100

Austin, Texas 78701

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ATTORNEYS FOR COMPLAINANTS  
ADC WEST RIDGE L.P., AND CENTER FOR  
HOUSING RESOURCES, INC.

**CERTIFICATE OF SERVICE**

I hereby certify that the above and foregoing document was served as shown below on  
this 19th day of January 2017:

Art Rodriguez  
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**Attorney for City of Frisco**

***Via email and U.S. First Class Mail***

Richard Abernathy  
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**Attorney for Public Utility Commission of Texas**

***Via email and U.S. First Class Mail***

/s/ Mallory Beck  
Mallory Beck

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

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|---|----------------------------------|---|
| <b>FORMAL COMPLAINT OF<br/>ADC WEST RIDGE, L.P. AND<br/>CENTER FOR HOUSING<br/>RESOURCES, INC. AGAINST THE<br/>CITY OF FRISCO</b> | <b>§<br/>§<br/>§<br/>§<br/>§</b> | <b>BEFORE THE STATE OFFICE<br/><br/>OF<br/><br/>ADMINISTRATIVE HEARINGS</b> |
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CENTER FOR HOUSING RESOURCES, INC.'S RESPONSES TO  
COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION  
STAFF RFI NOS. 2-1 THROUGH 2-5**

**STAFF RFI 2-1.** State whether you submitted civil construction plans to the City of Frisco in order to receive service to Lot 2.

**RESPONSE:**

Complainants have submitted civil construction plans on several occasions to the City of Frisco regarding Lot 2, including by and through submission to Collin County in approximately December 2015, by and through Complainants' general contractor in approximately June 2016 and September 2016, and by and through Complainants' civil engineer in approximately December 2016.

Prepared/Sponsored by:      Terri Anderson  
   Authorized Representative of  
   ADC West Ridge, L.P. and Center for Housing Resources, Inc.

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

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| <b>FORMAL COMPLAINT OF<br/>ADC WEST RIDGE, L.P. AND<br/>CENTER FOR HOUSING<br/>RESOURCES, INC. AGAINST THE<br/>CITY OF FRISCO</b> | <b>§<br/>§<br/>§<br/>§<br/>§</b> | <b>BEFORE THE STATE OFFICE<br/><br/>OF<br/><br/>ADMINISTRATIVE HEARINGS</b> |
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**ADC WEST RIDGE, L.P. AND  
CENTER FOR HOUSING RESOURCES, INC.'S RESPONSES TO  
COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION  
STAFF RFI NOS. 2-1 THROUGH 2-5**

**STAFF RFI 2-2.** List the remaining requirements that you must meet in order to become a Qualified Service Applicant.

**RESPONSE:**

Complainants are currently a Qualified Service Applicant. There are no remaining requirements that Complainants must meet to become a Qualified Service Applicant.

Prepared/Sponsored by:     Jack Stowe  
   Expert on behalf of Complainants

**SOAH DOCKET NO. 473-16-4619.WS  
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**ADC WEST RIDGE, L.P. AND  
CENTER FOR HOUSING RESOURCES, INC.'S RESPONSES TO  
COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION  
STAFF RFI NOS. 2-1 THROUGH 2-5**

**STAFF RFI 2-3.** State whether you intend to submit a development application and civil construction plan to the Development Services Department of the City of Frisco in order to receive service to Lot 2.

**RESPONSE:**

Complainants previously submitted a Development/Zoning Change Application to obtain a preliminary plat related to Lot 2 in order to establish vested rights in the proposed development. As explained in response to Staff RFI 2-1, Complainants previously submitted civil construction plans related to Lot 2. Complainants intend to submit a Final Plat application, which includes civil construction plans to the Development Services Department of the City of Frisco as required by the Conveyance Plat currently recorded in the property records. The Final Plat is solely related to on-site public improvements:

Prepared/Sponsored by: Terri Anderson  
Authorized Representative of  
ADC West Ridge, L.P. and Center for Housing Resources, Inc.

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

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**ADC WEST RIDGE, L.P. AND  
CENTER FOR HOUSING RESOURCES, INC.'S RESPONSES TO  
COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION  
STAFF RFI NOS. 2-1 THROUGH 2-5**

**STAFF RFI 2-4.** State whether it is your understanding that the City of Frisco's subdivision ordinance requires a developer to provide an extension of public facilities in accordance with the City of Frisco's engineering standards. If this is not your understanding of the City of Frisco's subdivision ordinance, provide an explanation of your understanding.

**RESPONSE:**

Complainants understand that pursuant to Section 8.01(b)(2) of the City of Frisco's Subdivision Ordinance, a property owner shall construct and extend on-site and off-site water and wastewater public facilities in accordance with the City's construction design standards, **if such improvements are necessary**. The City of Frisco's Subdivision Ordinance also addresses additional public facilities other than water and wastewater public facilities.

Prepared/Sponsored by:     Jack Stowe  
   \*     Expert on behalf of Complainants

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

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

**ADC WEST RIDGE, L.P. AND**  
**CENTER FOR HOUSING RESOURCES, INC.'S RESPONSES TO**  
**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION**  
**STAFF RFI NOS. 2-1 THROUGH 2-5**

**STAFF RFI 2-5.** State whether it is your understanding that the City of Frisco's subdivision ordinance requires you to dedicate easements and on/off site improvements necessary to adequately serve the Lot 2. If this is not your understanding of the City of Frisco's subdivision ordinance, provide an explanation of your understanding of the City of Frisco's subdivision ordinance as it relates to receiving service to Lot 2.

**RESPONSE:**

Complainants understand that pursuant to Section 8.01(b)(2) of the City of Frisco's Subdivision Ordinance, a property owner shall dedicate all rights of way and easements for, and shall construct and extend all necessary on-site and off-site water and wastewater public improvements, **if such improvements and easements are necessary**. Complainants are not aware of the easements and water and wastewater improvements required by Frisco to serve Lot 2.

Prepared/Sponsored by:      Jack Stowe  
Expert on behalf of Complainants