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

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FORMAL COMPLAINT OF KER-SEVA
LTD., ADC WEST RIDGE VILLAS, L.P.,
AND CENTER FOR HOUSING
RESOURCES, INC. AGAINST THE
CITY OF FRISCO, TEXAS

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BEFORE THE
FILING CLERK

PUBLIC UTILITY COMMISSION

OF TEXAS

REQUEST FOR ORAL ARGUMENT

TO THE HONORABLE COMMISSIONERS:

COMES NOW, Complainants Ker-Seva Ltd., ADC West Ridge Villas, L.P., and Center for Housing Resources, Inc. (collectively, "Complainants"), and file this Request for Oral Argument before the Commission at the Open Meeting on July 20, 2016, pursuant to PUC Procedural Rule 22.262(d), and would respectfully show as follows:


Complainants filed the Complaint under Texas Water Code §§ 13.250 and 13.254 and 16 Texas Administrative Code §§ 22.85 and 24.114 requesting that the Commission order the City of Frisco, Texas ("Frisco"), to provide continuous and adequate water and sewer service to Complainants' property. Complainants' property, on which Complainants plan to develop an affordable-housing apartment complex, is located within Frisco's extraterritorial jurisdiction and within water CCN No. 11772 and sewer CCN No. 20591 issued to Frisco.

The Complaint was referred to SOAH by Order of Referral dated June 14, 2016. Pursuant to that Order, the parties submitted pleadings identifying issues to be addressed and threshold issues in order to assist the Commission in issuing a preliminary order for this matter. The issues raised by the parties, including the jurisdictional questions and the issues to be addressed at SOAH, involve important public policy considerations, especially in light of the fact that the property is proposed to be developed for affordable housing. This matter also involves

significant issues related to the Commission's authority over areas outside of a municipality's corporate boundaries but within a CCN issued by the Commission. For these reasons, Complainants request oral argument related to the issues to be addressed and the threshold issues raised by the parties in their pleadings.

Respectfully submitted,

JACKSON WALKER L.L.P.

By: 

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ATTORNEYS FOR COMPLAINANTS
KER-SEVA, LTD., ADC WEST RIDGE
VILLAS 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 8th day of July 2016:

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A handwritten signature in black ink, appearing to read "Leonard Dougal", written over a horizontal line.

Leonard Dougal