



Control Number' 45870



Item Number' 37

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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. AGAINST THE CITY OF FRISCO  
RFI, TEXAS

§  
§  
§

BEFORE THE  
PUBLIC UTILITY COMMISSION  
OF TEXAS

**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S FIRST SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

Ker-Seva, Ltd. ADC West Ridge Villas, L.P. and Center for Housing Resources, Inc.'s file these Responses to City of FRISCO ("Frisco RFI") First Set of Requests for Information ("Frisco RFI RFI") and requests for Admission ("Frisco RFI RFA"), which was filed with the Public Utility Commission of Texas and served on Ker-Seva, Ltd. ADC West Ridge Villas, L.P. and Center for Housing Resources, Inc. on July 26, 2016. These responses are timely filed. Ker-Seva, Ltd. ADC West Ridge Villas, L.P. and Center for Housing Resources, Inc. agree and stipulate that all parties may treat these responses as if the answers were filed under oath. Complainants and Frisco agreed to amend some of the requests which are reflected herein.

Respectfully submitted,

JACKSON WALKER L.L.P.

By: Mallory Beck  
Leonard Dougal State Bar No. 06031400  
Mallory Beck State Bar No. 24073899  
100 Congress, Suite 1100  
Austin, Texas 78701  
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T: (512) 236 2233  
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ATTORNEYS FOR COMPLAINANTS  
KER-SEVA, LTD. 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 15th day of August 2016:

Art Rodriguez  
Russell & Rodriguez, L.L.P.  
1633 Williams Dr. Bldg. 2, Suite 200  
Georgetown, Texas 78268  
arodriguez@txadminlaw.com  
**Attorney for City of Frisco RFI**

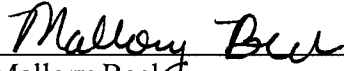
*Via email and U.S. First Class Mail*

Sam Chang  
Attorney – Legal Division  
Public Utility Commission of Texas  
1701 N. Congress Avenue  
P. O. Box 13326  
Austin, Texas 78711-3326  
sam.chang@puc.texas.gov  
**Attorney for Public Utility Commission of Texas**

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

State Office of Administrative Hearings  
300 West 15<sup>th</sup> St. Suite 502  
Austin, Texas 78701  
(512) 475-4993  
(512) 322-2061 Fax

*Via U.S. First Class Mail*

  
Mallory Beck

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<b>FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO RFI, TEXAS</b>	<b>§ § §</b>	<b>BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS</b>
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RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S FIRST SET OF  
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**Frisco RFI 1.**      Please produce all documents evidencing the conveyance of Lot 2 to Ker-Seva, Ltd.

**RESPONSE:**

Please find enclosed documents produced in response to this Request.

Prepared/Sponsored by:      To be supplemented.

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**Frisco RFI 2:** (AMENDED AS AGREED): Please produce all documents evidencing the conveyance of Lot 2 to ADC West Ridge Villas, LP.

**RESPONSE:**

Please find enclosed documents produced in response to this Request.

Prepared/Sponsored by:      To be supplemented.

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**Frisco RFI 3:**      Please produce all documents evidencing the conveyance of Lot 2 to Center for Housing Resources, Inc.

**RESPONSE:**

Please see documents responsive to Request for Information No. 2.

Prepared/Sponsored by:      To be supplemented.

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**Frisco RFI 4:** Please produce all documents evidencing an application by Ker-Seva, Ltd. to the City of Frisco for retail water service to Lot 2.

**RESPONSE:**

Please find enclosed documents produced in response to this Request.

Prepared/Sponsored by:      To be supplemented.

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RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S FIRST SET OF  
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**Frisco RFI 5:** Please produce all documents evidencing an application by ADC West Ridge Villas, LP. to the City of Frisco for retail water service to Lot 2.

**RESPONSE:**

Please find enclosed documents produced in response to this Request.

Prepared/Sponsored by: To be supplemented.



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**Frisco RFI 6:** Please produce all documents evidencing an application by Center for Housing Resources, Inc. to the City of Frisco for retail water service to Lot 2.

**RESPONSE:**

Please see documents responsive to Request for Information No. 5.

Prepared/Sponsored by: To be supplemented.

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**Frisco RFI 7:** Please produce all documents evidencing an application by Ker-Seva, Ltd. to the City of Frisco for retail sewer service to Lot 2.

**RESPONSE:**

Please see documents responsive to Request for Information No. 4.

Prepared/Sponsored by: To be supplemented.

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**Frisco RFI 8:** (AMENDED AS AGREED): Please produce all documents evidencing an application by ADC West Ridge Villas, LP. to the City of Frisco for retail sewer service to Lot 2.

**RESPONSE:**

Please see documents responsive to Request for Information No. 5.

Prepared/Sponsored by:      To be supplemented.

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**Frisco RFI 9:** Please produce all documents evidencing an application by Center for Housing Resources, Inc. to the City of Frisco for retail sewer service to Lot 2.

**RESPONSE:**

Please see documents responsive to Request for Information No. 5.

Prepared/Sponsored by: To be supplemented.

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**Frisco RFI 10:** (AMENDED AS AGREED): Please detail time, date, and content of any and all verbal communications between Ker-Seva, Ltd. regarding the provision of water and/or sewer service to the Property. including Lot 1 or Lot 2, or any portion thereof with any ~~other entity or person~~ governmental or regulatory authority or business interest, such as an affiliate or partner.

**RESPONSE:**

Ker-Seva, Ltd. including its agents and representatives, had verbal communications, including in person and by telephone, with officials with the City of Frisco and Collin County regarding the provision of water and sewer service to the Property between 2007 and 2016.

Pursuant to 16 Tex. Admin. Code § 22.144(c)(2)(E), please see documents produced in response to this Request.

Prepared/Sponsored by:      To be supplemented.

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**Frisco RFI 11.** (AMENDED AS AGREED): Please detail time, date, and content of any and all verbal communications between ADC West Ridge Villas, LP. regarding the provision of water and/or sewer service to the Property, including Lot 1 or Lot 2, or any portion thereof with any ~~other entity or person~~ governmental or regulatory authority or business interest, such as an affiliate or partner.

**RESPONSE:**

Representatives of ADC West Ridge, L.P. had numerous verbal communications, including in person and by telephone, with officials with the City of Frisco, the City of McKinney, Collin County, and the Texas Department of Housing and Community Affairs between January 2015 and the present relating generally to the development of Lot 2; some of these communications directly involved the provision of water and/or sewer service to Lot 2.

During the months of January and February 2015, representatives of ADC West Ridge, L.P. made many calls to the City of Frisco in order to gain support regarding the development of Lot 2.

In March 2015, repeated requests were made by representatives of ADC West Ridge, L.P. for a pre-construction meeting or any kind of meeting with the City of Frisco staff to review a proposed preliminary site plan. These requests were denied.

In April 2015, representatives of ADC West Ridge, L.P. met with City of Frisco staff to discuss the preliminary plat for Lot 2. City of Frisco staff insisted that the water and sewer utility lines must run south by obtaining easements through neighboring private property and insisted that the lines be located so that they traveled cross-country instead of along roads.

In December 2015, representatives of ADC West Ridge, L.P. communicated with representatives of Collin County and the City of Frisco regarding construction plans and utilities for Lot 2.

In June 2016, representatives of ADC West Ridge, L.P. communicated with City of Frisco staff and obtained a water meter for construction. Subsequently, representatives from the City of McKinney confiscated the temporary meter. Representatives of ADC West Ridge, L.P. communicated with City of Frisco staff, identified the location where they would place the meter on Frisco-owned infrastructure immediately adjacent to Lot 2, and obtained a second water meter for construction. This second meter was confiscated by the City of Frisco. City of McKinney representatives warned ADC West Ridge, L.P. not to use the fire hydrant next to Lot 2 and threatened them with arrest if they attempted to obtain any water from McKinney for Lot 2. ADC West Ridge, L.P. applied again for a third water meter from the City of Frisco. City of Frisco provided the meter but shortly thereafter told ADC West Ridge, L.P. not to use the meter to obtain any water for Lot 2.

Complainants reserve the right to supplement this response.

Pursuant to 16 Tex. Admin. Code § 22.144(c)(2)(E), please see documents produced in response to this Request.

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**Frisco RFI 12:** (AMENDED AS AGREED): Please detail time, date, and content of any and all verbal communications between Center for Housing Resources, Inc. regarding the provision of water and/or sewer service to the Property, including Lot 1 or Lot 2, or any portion thereof with any ~~other entity or person~~ governmental or regulatory authority or business interest, such as an affiliate or partner.

**RESPONSE:**

Please see the response to Request for Information No. 11.

Prepared/Sponsored by:      To be supplemented.



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**Frisco RFI 13:** (AMENDED AS AGREED): Please produce all documents evidencing any communication between Ker-Seva, Ltd. and other third party and any governmental or regulatory authority or business interest, such as an affiliate or partner, relating to the provision of water and/or sewer service to the Property, including Lot 1 or Lot 2.

**RESPONSE:**

Please see documents responsive to Request for Information No. 10.

Prepared/Sponsored by:      To be supplemented.

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**Frisco RFI 14:** (AMENDED AS AGREED): Please produce all documents evidencing any communication between ADC West Ridge Villas, LP. other third party and any governmental or regulatory authority or business interest, such as an affiliate or partner, relating to the provision of water and/or sewer service to the Property, including Lot 1 or Lot 2.

**RESPONSE:**

Please see documents responsive to Request for Information No. 11.

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**Frisco RFI 15:** (AMENDED AS AGREED): Please produce all documents evidencing any communication between Center for Housing Resources, Inc. and ~~other third party~~ and any governmental or regulatory authority or business interest, such as an affiliate or partner, relating to the provision of water and/or sewer service to the Property. including Lot 1 or Lot 2.

**RESPONSE:**

Please see documents responsive to Request for Information No. 12.

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**Frisco RFI 16:** (AMENDED AS AGREED): Please ~~list all facts~~ describe in general the factual bases that Ker-Seva, Ltd. contends makes it a qualified applicant for retail water service from the City for the Property.

**RESPONSE:**

Ker-Seva, Ltd. does not so contend.

Prepared/Sponsored by:      To be supplemented

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**Frisco RFI 17:** (AMENDED AS AGREED): Please ~~list all facts~~ describe in general the factual bases that Ker-Seva, Ltd. contends makes it a qualified applicant for retail water service from the City for Lot 1.

**RESPONSE:**

Ker-Seva, Ltd. is currently receiving water and sewer service through facilities owned by Frisco.

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**Frisco RFI 18:** (AMENDED AS AGREED): Please ~~list all facts~~ describe in general the factual bases that Ker-Seva, Ltd. contends makes it a qualified applicant for retail water service from the City for Lot 2.

**RESPONSE:**

At the time that the Complaint was filed, Ker-Seva, Ltd. was the owner of Lot 2. Lot 2 is located within the City of Frisco's extraterritorial jurisdiction and water and sewer CCNs. Frisco-owned infrastructure exists directly adjacent to Lot 2 and is capable of providing water and sewer service to Lot 2. As the owner of Lot 2, on November 6, 2015, Ker-Seva, Ltd. applied for water and sewer service for Lot 2. Ker-Seva, Ltd. is not aware of any requirements contained in any tariff, schedule of rates, or service policies and regulations for extension of service with which Ker-Seva, Ltd. has not complied for Lot 2.

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**Frisco RFI 19:** (AMENDED AS AGREED): Please ~~list all facts~~ describe in general the factual bases that Ker-Seva, Ltd. contends makes it a consumer of retail water service from the City for the Property.

**RESPONSE:**

Ker-Seva, Ltd. does not so contend.

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**Frisco RFI 20:** (AMENDED AS AGREED): Please ~~list all facts~~ describe in general the factual bases that Ker-Seva, Ltd. contends makes it a consumer of retail water service from the City for Lot 1.

**RESPONSE:**

Ker-Seva, Ltd. is receiving water and sewer service through facilities owned by Frisco.

Prepared by/sponsored by:    To be supplemented.



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**Frisco RFI 21.** (AMENDED AS AGREED): Please ~~list all facts~~ describe in general the factual bases that Ker-Seva, Ltd. contends makes it a consumer of retail water service from the City for Lot 2.

**RESPONSE:**

At the time that the Complaint was filed, Ker-Seva, Ltd. was the owner of Lot 2. Lot 2 is located within the City of Frisco's extraterritorial jurisdiction and water and sewer CCNs. Frisco-owned infrastructure exists directly adjacent to Lot 2 and is capable of providing water and sewer service to Lot 2. As the owner of Lot 2, on November 6, 2015, Ker-Seva, Ltd. applied for water and sewer service for Lot 2.

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**Frisco RFI 22:** (AMENDED AS AGREED): Please ~~list all facts~~ describe in general the factual bases that Ker-Seva, Ltd. contends makes it a qualified applicant for retail sewer service from the City for the Property.

**RESPONSE:**

Please see the response to Request for Information No. 16.

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**Frisco RFI 23:** (AMENDED AS AGREED): Please ~~list all facts~~ describe in general the factual bases that Ker-Seva, Ltd. contends makes it a qualified applicant for retail sewer service from the City for Lot 1.

**RESPONSE:**

Please see the response to Request for Information No. 17

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**Frisco RFI 24:** (AMENDED AS AGREED): Please ~~list all facts~~ describe in general the  
factual bases that Ker-Seva, Ltd. contends makes it a qualified applicant for  
retail sewer service from the City for Lot 2.

**RESPONSE:**

Please see the response to Request for Information No. 18.

Prepared/Sponsored by:      To be supplemented.

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RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S FIRST SET OF  
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**Frisco RFI 25:** (AMENDED AS AGREED): Please ~~list all facts~~ describe in general the factual bases that Ker-Seva, Ltd. contends makes it a consumer of retail sewer service from the City for the Property.

**RESPONSE:**

Please see the response to Request for Information No. 19.

Prepared/sponsored by:      To be supplemented.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO RFI, TEXAS	§ § §	BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S FIRST SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 26:** (AMENDED AS AGREED): Please ~~list all facts~~ describe in general the factual bases that Ker-Seva, Ltd. contends makes it a consumer of retail sewer service from the City for Lot 1.

**RESPONSE:**

Please see the response to Request for Information No. 20.

Prepared/Sponsored by:      To be supplemented.

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

<b>FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO RFI, TEXAS</b>	<b>§ § §</b>	<b>BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS</b>
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S FIRST SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 27** (AMENDED AS AGREED): Please ~~list all facts~~ describe in general the  
factual bases that Ker-Seva Ltd. contends makes it a consumer of retail sewer  
service from the City for Lot 2.

**RESPONSE:**

Please see the response to Request for Information No. 21.

Prepared/Sponsored by:      To be supplemented.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO RFI, TEXAS	§ § §	BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S FIRST SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 28:** (AMENDED AS AGREED): Please ~~list all facts~~ describe in general the  
factual bases that ADC West Ridge Villas, L.P. contends makes it a qualified  
applicant for retail water service from the City for the Property.

**RESPONSE:**

ADC West Ridge, L.P. does not so contend.

Prepared/Sponsored by:      To be supplemented.



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

<b>FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO RFI, TEXAS</b>	§ § §	<b>BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS</b>
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S FIRST SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 29:** (AMENDED AS AGREED): Please ~~list all facts~~ describe in general the  
factual bases that ADC West Ridge Villas, L.P. contends makes it a qualified  
applicant for retail water service from the City for Lot 1.

**RESPONSE:**

ADC West Ridge, L.P. does not so contend.

Prepared/Sponsored by:      To be supplemented.

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

<b>FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO RFI, TEXAS</b>	§ § §	<b>BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS</b>
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S FIRST SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 30:** (AMENDED AS AGREED): Please ~~list all facts~~ describe in general the factual bases that ADC West Ridge Villas, L.P. contends makes it a qualified applicant for retail water service from the City for Lot 2.

**RESPONSE:**

ADC West Ridge, L.P. is the owner of Lot 2. Lot 2 is located within the City of Frisco's extraterritorial jurisdiction and water and sewer CCNs. Frisco-owned infrastructure exists directly adjacent to Lot 2 and is capable of providing water and sewer service to Lot 2. As the owner of Lot 2, on June 10, 2016, ADC West Ridge, L.P. applied for water and sewer service for Lot 2. ADC West Ridge, L.P. is not aware of any requirements contained in any tariff, schedule of rates, or service policies and regulations for extension of service with which ADC West Ridge, L.P. has not complied for Lot 2.

Prepared/Sponsored by:      To be supplemented.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO RFI, TEXAS	§ § §	BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S FIRST SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 31.** (AMENDED AS AGREED): Please ~~list all facts~~ describe in general the  
factual bases that ADC West Ridge Villas, L.P. contends makes it a consumer  
of retail water service from the City for the Property.

**RESPONSE:**

ADC West Ridge, L.P. does not contend that it is a consumer of retail water service from  
the City for the Property.

Prepared/Sponsored by:      To be supplemented.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO RFI, TEXAS	§ § §	BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S FIRST SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 32:** (AMENDED AS AGREED): Please ~~list all facts~~ describe in general the factual bases that ADC West Ridge Villas, L.P. contends makes it a consumer of retail water service from the City for Lot 1.

**RESPONSE:**

ADC West Ridge, L.P. does not contend that it is a consumer of retail water service from the City for Lot 1.

Prepared/Sponsored by:      To be supplemented.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO RFI, TEXAS	§ § §	BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S FIRST SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 33:** (AMENDED AS AGREED): Please ~~list all facts~~ describe in general the factual bases that ADC West Ridge Villas, L.P. contends makes it a consumer of retail water service from the City for Lot 2.

**RESPONSE:**

ADC West Ridge, L.P. owns Lot 2. Lot 2 is located within Frisco's extraterritorial jurisdiction and water and sewer CCNs. Frisco-owned infrastructure exists directly adjacent to Lot 2 and is capable of providing water and sewer service to Lot 2. As the owner of Lot 2, on June 10, 2016, ADC West Ridge, L.P. applied for water and sewer service for Lot 2.

Prepared/Sponsored by:      To be supplemented.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO RFI, TEXAS	§ § §	BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S FIRST SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 34:** (AMENDED AS AGREED): Please ~~list all facts~~ describe in general the factual bases that ADC West Ridge Villas, L.P. contends makes it a qualified applicant for retail sewer service from the City for the Property.

**RESPONSE:**

Please see the response to Request for Information No. 28.

Prepared/Sponsored by:      To be supplemented.

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

<b>FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO RFI, TEXAS</b>	<b>§ § §</b>	<b>BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS</b>
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S FIRST SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 35:** (AMENDED AS AGREED): Please ~~list all facts~~ describe in general the factual bases that ADC West Ridge Villas, L.P. contends makes it a qualified applicant for retail sewer service from the City for Lot 1.

**RESPONSE:**

Please see the response to Request for Information No. 29.

Prepared/Sponsored by:      To be supplemented.

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

<b>FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO RFI, TEXAS</b>	<b>§ § §</b>	<b>BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS</b>
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S FIRST-SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 36:** (AMENDED AS AGREED): Please ~~list all facts~~ describe in general the factual bases that ADC West Ridge Villas, L.P. contends makes it a qualified applicant for retail sewer service from the City for Lot 2.

**RESPONSE:**

Please see the response to Request for Information No. 30.

Prepared/Sponsored by:      To be supplemented.



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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO RFI, TEXAS	§ § §	BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S FIRST SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 37** (AMENDED AS AGREED): Please ~~list all facts~~ describe in general the factual bases that ADC West Ridge Villas, L.P. contends makes it a consumer of retail sewer service from the City for the Property.

**RESPONSE:**

ADC West Ridge, L.P. does not so contend.

Prepared/Sponsored by:      To be supplemented.

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

FORMAL COMPLAINT OF KER-SEVA	§	BEFORE THE
LTD. AGAINST THE CITY OF FRISCO	§	PUBLIC UTILITY COMMISSION
RFI, TEXAS	§	OF TEXAS

**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S FIRST SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 38:** (AMENDED AS AGREED): Please ~~list all facts~~ describe in general the factual bases that ADC West Ridge Villas, L.P. contends makes it a consumer of retail sewer service from the City for Lot 1.

**RESPONSE:**

ADC West Ridge, L.P. does not so contend.

Prepared/Sponsored by:      To be supplemented.

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

<b>FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO RFI, TEXAS</b>	<b>§ § §</b>	<b>BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS</b>
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S FIRST SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 39:** (AMENDED AS AGREED): Please ~~list all facts~~ describe in general the factual bases that ADC West Ridge Villas, L.P. contends makes it a consumer of retail sewer service from the City for Lot 2.

**RESPONSE:**

See the Response to Request for Information No. 33.

Prepared/Sponsored by:      To be supplemented.

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

<b>FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO RFI, TEXAS</b>	<b>§ § §</b>	<b>BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS</b>
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S FIRST SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 40:** (AMENDED AS AGREED): Please ~~list all facts~~ describe in general the factual bases that Center for Housing Resources, Inc. contends makes it a qualified applicant for retail water service from the City for the Property.

**RESPONSE:**

Center for Housing Resources, Inc. does not so contend.

Prepared/Sponsored by:      To be supplemented.

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

<b>FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO RFI, TEXAS</b>	<b>§ § §</b>	<b>BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS</b>
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S FIRST SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 41.** (AMENDED AS AGREED): Please ~~list all facts~~ describe in general the factual bases that Center for Housing Resources, Inc. contends makes it a qualified applicant for retail water service from the City for Lot 1.

**RESPONSE:**

Center for Housing Resources, Inc. does not so contend.

Prepared/Sponsored by:      To be supplemented.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO RFI, TEXAS	§ § §	BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S FIRST SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 42:** (AMENDED AS AGREED): Please ~~list all facts~~ describe in general the factual bases that Center for Housing Resources, Inc. contends makes it a qualified applicant for retail water service from the City for Lot 2.

**RESPONSE:**

Center for Housing Resources, Inc. is the sole manager of the general partner of the owner of Lot 2. Lot 2 is located within the City of Frisco's extraterritorial jurisdiction and water and sewer CCNs. Frisco-owned infrastructure exists directly adjacent to Lot 2 and is capable of providing water and sewer service to Lot 2. On June 10, 2016, Center for Housing Resources, Inc. applied for water and sewer service for Lot 2. Center for Housing Resources, Inc. is not aware of any requirements contained in any tariff, schedule of rates, or service policies and regulations for extension of service with which Center for Housing Resources, Inc. has not complied for Lot 2.

Prepared/Sponsored by:      To be supplemented.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO RFI, TEXAS	§ § §	BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S FIRST SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 43:** (AMENDED AS AGREED): Please ~~list all facts~~ describe in general the  
factual bases that Center for Housing Resources, Inc. contends makes it a  
consumer of retail water service from the City for the Property.

**RESPONSE:**

Center for Housing Resources, Inc. does not so contend.

Prepared/Sponsored by:      To be supplemented.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO RFI, TEXAS	§ § §	BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S FIRST SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 44:** (AMENDED AS AGREED): Please ~~list all facts~~ describe in general the  
factual bases that Center for Housing Resources, Inc. contends makes it a  
consumer of retail water service from the City for Lot 1.

**RESPONSE:**

Center for Housing Resources, Inc. does not so contend.

Prepared/Sponsored by:      To be supplemented.



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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO RFI, TEXAS	§ § §	BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S FIRST SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 45:** (AMENDED AS AGREED): Please ~~list all facts~~ describe in general the factual bases that Center for Housing Resources, Inc. contends makes it a consumer of retail water service from the City for Lot 2.

**RESPONSE:**

Center for Housing Resources, Inc. is the sole manager of the general partner of the owner of Lot 2. Lot 2 is located within Frisco's extraterritorial jurisdiction and water and sewer CCNs. Frisco-owned infrastructure exists directly adjacent to Lot 2 and is capable of providing water and sewer service to Lot 2. On June 10, 2016, Center for Housing Resources, Inc. applied for water and sewer service for Lot 2.

Prepared/Sponsored by:        To be supplemented.

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

FORMAL COMPLAINT OF KER-SEVA LTD. AGAINST THE CITY OF FRISCO RFI, TEXAS	§ § §	BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS
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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING  
RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S FIRST SET OF  
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

**Frisco RFI 46:** (AMENDED AS AGREED): Please ~~list all facts~~ describe in general the factual bases that Center for Housing Resources, Inc. contends makes it a qualified applicant for retail sewer service from the City for the Property.

**RESPONSE:**

Please see the response to Request for Information No. 40.

Prepared/Sponsored by:      To be supplemented.