

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
---	-------------	---

**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 47** (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 Lot 1.

**RESPONSE:**

Please see the response to Request for Information No. 41.

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
---	-------------	---

**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 48:** (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 Lot 2.

**RESPONSE:**

Please see the response to Request for Information No. 42.

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 49:** (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 sewer 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	§	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 50:** (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 sewer 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
---	-------------	---

**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 51.** (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 sewer service from the City for Lot 2.

**RESPONSE:**

Please see the response to Request for Information No. 45.

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>
--	----------------------	--

**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 52:** Please provide all documents evidencing the basis for Ker-Seva, Ltd.'s contention that it is a qualified applicant for retail water service from the City for the Property.

**RESPONSE:**

Please see the response to Request for Information No. 16. Please see documents produced in response to this Request.

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>
--	-------------	--

**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 53:** Please provide all documents evidencing the basis for Ker-Seva, Ltd.'s contention that it is a qualified applicant for retail water service from the City for Lot 1.

**RESPONSE:**

Please see the response to Request for Information No. 17    Please see documents produced in response to this Request.

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>
--	----------------------	--

**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 54:** Please provide all documents evidencing the basis for Ker-Seva, Ltd.'s contention that it is a qualified applicant for retail water service from the City for Lot 2.

**RESPONSE:**

Please see documents produced in response to this Request.

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>
--	----------------------	--

**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 55:** Please provide all documents evidencing the basis for Ker-Seva, Ltd.'s contention that it is a consumer of retail water service from the City for the Property.

**RESPONSE:**

Please see documents produced in response to this Request.

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>
--	----------------------	--

**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 56:** Please provide all documents evidencing the basis for Ker-Seva, Ltd.'s contention that it is a consumer of retail water service from the City for Lot 1.

**RESPONSE:**

Please see documents produced in response to this Request.

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>
--	----------------------	--

**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 57:** Please provide all documents evidencing the basis for Ker-Seva, Ltd.'s contention that it is a consumer of retail water service from the City for Lot 2.

**RESPONSE:**

Please see documents produced in response to this Request.

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>
--	----------------------	--

**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 58:** Please provide all documents evidencing the basis for Ker-Seva, Ltd.'s contention that it is a qualified applicant for retail sewer service from the City for the Property.

**RESPONSE:**

Please see documents produced in response to this Request.

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>
--	----------------------	--

**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 59:** Please provide all documents evidencing the basis for Ker- Seva, Ltd.'s contention that it is a qualified applicant for retail sewer service from the City for Lot 1.

**RESPONSE:**

Please see documents produced in response to this Request.

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>
--	----------------------	--

**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 60:** Please provide all documents evidencing the basis for Ker-Seva, Ltd.'s contention that it is a qualified applicant for retail sewer service from the City for Lot 2.

**RESPONSE:**

Please see documents produced in response to this Request.

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>
--	----------------------	--

**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 61.** Please provide all documents evidencing the basis for Ker-Seva, Ltd.'s contention that it is a consumer of retail sewer service from the City for the Property.

**RESPONSE:**

Please see documents produced in response to this Request.

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>
--	----------------------	--

**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 62:** Please provide all documents evidencing the basis for Ker-Seva, Ltd. s contention that it is a consumer of retail sewer service from the City for Lot 1.

**RESPONSE:**

Please see documents produced in response to this Request.

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
---	-------------	---

**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 63:** Please provide all documents evidencing the basis for Ker-Seva, Ltd.'s contention that it is a consumer of retail sewer service from the City for Lot 2.

**RESPONSE:**

Please see documents produced in response to this Request.

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>
--	----------------------	--

**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 64:** (AMENDED AS AGREED): Please provide all documents evidencing the basis for ADC West Ridge Villas, L.P.'s contention that it is a qualified applicant for retail water 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>
--	----------------------	--

**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 65:** (AMENDED AS AGREED): Please provide all documents evidencing the basis for ADC West Ridge Villas, L.P.'s contention that it is a qualified applicant for retail water 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>
--	----------------------	--

**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 66:** (AMENDED AS AGREED): Please provide all documents evidencing the basis for ADC West Ridge Villas, L.P.'s contention that it is a qualified applicant for retail water service from the City for Lot 2.

**RESPONSE:**

Please see documents produced in response to this Request.

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
---	-------------	---

**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 67** (AMENDED AS AGREED): Please provide all documents evidencing the basis for ADC West Ridge Villas, L.P.'s contention that it is a consumer of retail water service from the City for the Property.

**RESPONSE:**

Please see response to Request for Information No. 31.

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>
--	----------------------	--

**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 68:** (AMENDED AS AGREED): Please provide all documents evidencing the basis for ADC West Ridge Villas, L.P.'s contention that it is a consumer of retail water service from the City for Lot 1.

**RESPONSE:**

Please see the response to Request for Information No. 32.

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>
--	----------------------	--

**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 69:** (AMENDED AS AGREED): Please provide all documents evidencing the basis for ADC West Ridge Villas, L.P.'s contention that it is a consumer of retail water service from the City for Lot 2.

**RESPONSE:**

Please see the documents produced in response to this Request.

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>
--	----------------------	--

**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 70:** (AMENDED AS AGREED): Please provide all documents evidencing the basis for ADC West Ridge Villas, L.P.'s contention that it is a qualified applicant for retail sewer service from the City for the Property.

**RESPONSE:**

Please see the response to Request for Information No. 34.

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>
--	----------------------	--

**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 71.** (AMENDED AS AGREED): Please provide all documents evidencing the basis for ADC West Ridge Villas, L.P.'s contention that it is a qualified applicant for retail sewer service from the City for Lot 1.

**RESPONSE:**

Please see the response to Request for Information No. 35.

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>
--	-------------	--

**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 72:** (AMENDED AS AGREED): Please provide all documents evidencing the basis for ADC West Ridge Villas, L.P.'s contention that it is a qualified applicant for retail sewer service from the City for Lot 2.

**RESPONSE:**

Please see documents produced in response to this Request.

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
---	-------------	---

**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 73:** (AMENDED AS AGREED): Please provide all documents evidencing the basis for ADC West Ridge Villas, L.P.'s contention that it is a consumer of retail sewer service from the City for the Property.

**RESPONSE:**

Please see the response to Request for Information No. 37.

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 74:** (AMENDED AS AGREED): Please provide all documents evidencing the basis for ADC West Ridge Villas, L.P.'s contention that it is a consumer of retail sewer service from the City for Lot 1.

**RESPONSE:**

Please see the response to Request for Information No. 38.

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>
--	----------------------	--

**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 75:** (AMENDED AS AGREED): Please provide all documents evidencing the basis for ADC West Ridge Villas, L.P.'s contention that it is a consumer of retail sewer service from the City for Lot 2.

**RESPONSE:**

Please see the documents produced in response to this Request.

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>
--	----------------------	--

**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 76:** Please provide all documents evidencing the basis for Center for Housing Resources, Inc.'s contention that it is a qualified applicant for retail water service from the City for the Property.

**RESPONSE:**

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

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>
--	----------------------	--

**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 77:** Please provide all documents evidencing the basis for Center for Housing Resources, Inc.'s contention that it is a qualified applicant for retail water service from the City for Lot 1.

**RESPONSE:**

Please see the response to Request for Information No. 41.

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>
--	----------------------	--

**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 78:** Please provide all documents evidencing the basis for Center for Housing Resources, Inc.'s contention that it is a qualified applicant for retail water service from the City for Lot 2.

**RESPONSE:**

Please see documents produced in response to this Request.

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>
--	----------------------	--

**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 79:** Please provide all documents evidencing the basis for Center for Housing Resources, Inc.'s contention that it is a consumer of retail water service from the City for the Property.

**RESPONSE:**

Please see the response to Request for Information No. 43.

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>
--	----------------------	--

**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 80:** Please provide all documents evidencing the basis for Center for Housing Resources, Inc.'s contention that it is a consumer of retail water service from the City for Lot 1.

**RESPONSE:**

Please see the response to Request for Information No. 44.

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>
--	----------------------	--

**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 81.** Please provide all documents evidencing the basis for Center for Housing Resources, Inc.'s contention that it is a consumer of retail water service from the City for Lot 2.

**RESPONSE:**

Please see the documents produced in response to this Request.

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>
--	----------------------	--

**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 82:** Please provide all documents evidencing the basis for Center for Housing Resources, Inc.'s contention that it is a qualified applicant for retail sewer service from the City for the Property.

**RESPONSE:**

Please see the response to Request for Information No. 46.

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>
--	----------------------	--

**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 83:** Please provide all documents evidencing the basis for Center for Housing Resources, Inc.'s contention that it is a qualified applicant for retail sewer service from the City for Lot 1.

**RESPONSE:**

Please see the response to Request for Information No. 47.

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>
--	----------------------	--

**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 84:** Please provide all documents evidencing the basis for Center for Housing Resources, Inc.'s contention that it is a qualified applicant for retail sewer service from the City for Lot 2.

**RESPONSE:**

Please see documents produced in response to this Request.

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>
--	----------------------	--

**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 85:** Please provide all documents evidencing the basis for Center for Housing Resources, Inc.'s contention that it is a consumer of retail sewer service from the City for the Property.

**RESPONSE:**

Please see the response to Request for Information No. 49.

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>
--	----------------------	--

**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 86:** Please provide all documents evidencing the basis for Center for Housing Resources, Inc.'s contention that it is a consumer of retail sewer service from the City for Lot 1.

**RESPONSE:**

Please see the response to Request for Information No. 50.

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>
--	-------------	--

**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 87:** Please provide all documents evidencing the basis for Center for Housing Resources, Inc.'s contention that it is a consumer of retail sewer service from the City for Lot 2.

**RESPONSE:**

Please see the documents produced in response to this Request.

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>
--	-------------	--

**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 88:** Please provide the date Ker-Seva, Ltd. contends that it became a qualified applicant for retail water service from the City for:

- a. The Property
- b. Lot 1
- c. Lot 2

**RESPONSE:**

- a. Please see the response to Request for Information No. 16.
- b. Please see the response to Request for Information No. 17.
- c. Ker-Seva, Ltd. became a qualified applicant for retail water service from the City for Lot 2 no later than November 6, 2015.

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>
--	-------------	--

**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 89:** Please provide the date Ker-Seva, Ltd. contends that it became a qualified applicant for retail sewer service from the City for:

- a. The Property
- b. Lot 1
- c. Lot 2

**RESPONSE:**

- a. Please see the response to Request for Information No. 22.
- b. Please see the response to Request for Information No. 23.
- c. Ker-Seva, Ltd. became a qualified applicant for retail sewer service from the City for Lot 2 no later than November 6, 2015.

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>
--	----------------------	--

**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 90:** (AMENDED AS AGREED): Please provide the date ADC West Ridge Villas, L.P. contends that it became a qualified applicant for retail water service from the City for:

- a. The Property
- b. Lot 1
- c. Lot 2

**RESPONSE:**

- a. Please see the response to Request for Information No. 28.
- b. Please see the response to Request for Information No. 29.
- c. ADC West Ridge, L.P. became a qualified applicant for retail water service from the City for Lot 2 no later than June 10, 2016.

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
---	-------------	---

**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 91.** (AMENDED AS AGREED): Please provide the date ADC West Ridge Villas, L.P. contends that it became a qualified applicant for retail sewer service from the City for:

- a. The Property
- b. Lot 1
- c. Lot 2

**RESPONSE:**

- a. Please see the response to Request for Information No. 34.
- b. Please see the response to Request for Information No. 35.
- c. ADC West Ridge, L.P. became a qualified applicant for retail sewer service from the City for Lot 2 no later than June 10, 2016.

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>
--	-------------	--

**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 92:** Please provide the date Center for Housing Resources, Inc. contends that it became a qualified applicant for retail water service from the City for:

- a. The Property
- b. Lot 1
- c. Lot 2

**RESPONSE:**

- a. Please see the response to Request for Information No. 40.
- b. Please see the response to Request for Information No. 41.
- c. Center for Housing Resources, Inc. became a qualified applicant for retail water service from the City for Lot 2 no later than June 10, 2016.

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>
--	----------------------	--

**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 93:** Please provide the date Center for Housing Resources, Inc. contends that it became a qualified applicant for retail sewer service from the City for:

- a. The Property
- b. Lot 1
- c. Lot 2

**RESPONSE:**

- a. Please see the response to Request for Information No. 46.
- b. Please see the response to Request for Information No. 47.
- c. Center for Housing Resources, Inc. became a qualified applicant for retail sewer service from the City for Lot 2 no later than June 10, 2016.

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
---	-------------	---

**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 94:** Please provide all documents evidencing the City of McKinney's willingness to provide retail water service to any of the Complainants to:

- a. The Property
- b. Lot 1
- c. Lot 2

**RESPONSE:**

Please see documents responsive to this Request.

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>
--	----------------------	--

**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 95:** (AMENDED AS AGREED): Please explain and provide supporting documentation for Complainants' contention that the City is a 'utility' as defined in 16 Tex. Admin. Code Sec. 24.3 (72).

**RESPONSE:**

Complainants do not contend that the City is a 'utility' as defined in 16 Tex. Admin. Code Sec. 24.3(72).

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>
--	----------------------	--

**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 96:** (AMENDED AS AGREED): Please explain in general the factual bases for and provide supporting documentation for the contention that the Annexation Agreement, contained in Exhibit C to the Second Amended Formal Complaint Against the City of Frisco, Texas, filed in the above referenced docket, is still in full force and effect.

**RESPONSE:**

Complainants are aware that the Annexation Agreement contains a five-year term. Discovery is ongoing, and Complainants will supplement this response as additional facts come into light.

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
---	-------------	---

**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 97:** (AMENDED AS AGREED): Please explain in general the factual bases for and provide supporting evidence for the contention that the Annexation Agreement, contained in Exhibit C to the Second Amended Formal Complaint Against the City of Frisco, Texas, filed in the above referenced docket, was assigned to Ker-Seva, Ltd.

**RESPONSE:**

The Annexation Agreement is a covenant running with the land and recorded in the Deed Records of Collin County for the Property. Ker-Seva, Ltd. is the successor-in-interest to the Property from the signatories Baljeet Jawanda and Daljit Hundle. Please see the documents produced in response to this Request. Discovery is ongoing, and Complainants reserve the right to supplement and amend this response.

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 98:** (AMENDED AS AGREED): Please explain in general the factual bases for and provide supporting evidence for the contention that the Annexation Agreement, contained in Exhibit C to the Second Amended Formal Complaint Against the City of Frisco, Texas, filed in the above referenced docket, was assigned to ADC West Ridge Villas, L.P.

**RESPONSE:**

The Annexation Agreement is a covenant running with the land and recorded in the Deed Records of Collin County for the Property. ADC West Ridge, L.P. is the successor-in-interest to the Property from Ker-Seva, Ltd. who is the successor-in-interest to the Property from the signatories Baljeet Jawanda and Daljit Hundle. Please see the documents responsive to Request for Information No. 97. Discovery is ongoing, and Complainants reserve the right to supplement and amend this response.

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>
--	----------------------	--

**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 99:** (AMENDED AS AGREED): Please explain in general the factual bases for and provide supporting evidence for the contention that the Annexation Agreement, contained in Exhibit C to the Second Amended Formal Complaint Against the City of Frisco, Texas, filed in the above referenced docket, was assigned to Center for Housing Resources, Inc.

**RESPONSE:**

The Annexation Agreement is a covenant running with the land and recorded in the Deed Records of Collin County for the Property. Center for Housing Resources, Inc. is the sole manager of the general partner of ADC West Ridge, L.P. ADC West Ridge, L.P. is the successor-in-interest to the Property from Ker-Seva, Ltd. who is the successor-in-interest to the Property from the signatories Baljeet Jawanda and Daljit Hundle. Discovery is ongoing, and Complainants reserve the right to supplement and amend this response.

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>
--	----------------------	--

**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 100:** (AMENDED AS AGREED): Please explain in general the factual bases for and provide supporting documentation for the contention that the Development Agreement, contained in Exhibit D to the Second Amended Formal Complaint Against the City of Frisco, Texas, filed in the above referenced docket, is still in full force and effect.

**RESPONSE:**

Complainants do not contend that the Development Agreement is still in full force and effect.

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>
--	----------------------	--

**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 101.** (AMENDED AS AGREED): Please explain in general the factual bases for and provide supporting evidence for the contention that the Development Agreement, contained in Exhibit D to the Second Amended Formal Complaint Against the City of Frisco, Texas, filed in the above referenced docket, was assigned to Ker-Seva, Ltd.

**RESPONSE:**

The Development Agreement is a covenant running with the land and recorded in the Deed Records of Collin County for Lot 1. Ker-Seva, Ltd. is the successor-in-interest to Lot 1 from the signatories Baljeet Jawanda and Daljit Hundle. Please see the documents produced in response to this Request. Discovery is ongoing, and Complainants reserve the right to supplement and amend this response.

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>
--	----------------------	--

**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 102:** (AMENDED AS AGREED): Please explain in general the factual bases for and provide supporting evidence for the contention that the Development Agreement, contained in Exhibit D to the Second Amended Formal Complaint Against the City of Frisco, Texas, filed in the above referenced docket, was assigned to ADC West Ridge Villas, LP.

**RESPONSE:**

Complainants do not contend that the Development Agreement was assigned to ADC West Ridge, L.P.

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 103:** (AMENDED AS AGREED): Please explain in general the factual bases for and provide supporting evidence for the contention that the Development Agreement, contained in Exhibit D to the Second Amended Formal Complaint Against the City of Frisco, Texas, filed in the above referenced docket, was assigned to Center for Housing Resources, Inc.

**RESPONSE:**

Complainants do not contend that the Development Agreement was assigned to Center for Housing Resources, Inc.

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 104:** (AMENDED AS AGREED): Please explain and provide supporting evidence for the contention that the Development Agreement, contained in Exhibit D to the Second Amended Formal Complaint Against the City of Frisco, Texas, filed in the above referenced docket, is applicable to Lot 2.

**RESPONSE:**

Per the terms of the Development Agreement, the subject of the Agreement is Westridge Addition, Lot 1, Block A.

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>
--	----------------------	--

**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 RFA 1.** Admit that the City of Frisco, Texas, is a municipality.

**RESPONSE:**

Admit.

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
---	-------------	---

**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 RFA 2:** (AMENDED AS AGREED): Admit that the City of Frisco, Texas, holds a water certificate of convenience and necessity no. 11772 from the Public Utility Commission of Texas.

**RESPONSE:**

Admit.

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>
--	----------------------	--

**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 RFA 3:** (AMENDED AS AGREED): Admit that the City of Frisco, Texas, holds a sewer certificate of convenience and necessity no. 20591 from the Public Utility Commission of Texas.

**RESPONSE:**

Admit.

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>
--	----------------------	--

**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 RFA 4:** Admit that the Property is located within the service territory of the water certificate of convenience and necessity referred to in Request for Admission No. 2.

**RESPONSE:**

Admit.

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>
--	----------------------	--

**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 RFA 5:** Admit that the Property is located within the service territory of the sewer certificate of convenience and necessity referred to in Request for Admission No. 3.

**RESPONSE:**

Admit.

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>
--	----------------------	--

**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 RFA 6:** Admit that Lot 2 is located within the Property.

**RESPONSE:**

Admit.

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>
--	-------------	--

**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 RFA 7:** Admit that the Development Agreement, contained in Exhibit D to the Second Amended Formal Complaint Against the City of Frisco RFI, Texas, filed in this docket, does not concern Lot 2.

**RESPONSE:**

Deny.

Prepared/Sponsored by: To be supplemented.