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

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COMPLAINT OF KER-SEVA LTD. § BEFORE THE STATE OFFICE OF
AGAINST THE CITY OF FRISCO § ADMINISTRATIVE HEARINGS

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

The City of Frisco ("City" or "Frisco") and files these Responses to the Third Set of Requests for Information ("RFI") and Requests for Admission ("RFA") of Ker-Seva Ltd., ADC West Ridge Villas, LP and Center for Housing Resources, Inc. ("Complainants") served on August 26, 2016. The City objected to Requests for Information Nos. 59-62. As such, responses to said requests are not contained herein. This response is timely filed. The City agrees that the responses may be treated as if the answers were filed under oath.

Respectfully submitted,

Russell & Rodriguez, L.L.P.

1633 Williams Drive, Building 2, Suite 200
Georgetown, Texas 78628
(512) 930-1317
(866) 929-1641 (Fax)

Abernathy Roeder Boyd & Hullett, P.C.

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

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

ATTORNEYS FOR THE CITY OF FRISCO

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Request for Information No. 63: (AMENDED AS AGREED) Please produce all documents relating to a written explanation, as referred to in PUC Rule 24.85(a)(4), of the construction required to provide retail water service to Lot 2 provided by Frisco to Ker-Seva, Ltd., ADC West Ridge, L.P., and/or Center for Housing Resources, Inc. or their representatives.

RESPONSE: As Ker-Seva, Ltd., ADC West Ridge, L.P., and/or Center for Housing Resources are not qualified applicants for service from the City, said rule is inapplicable. However, communications regarding service were provided in response to RFI No. 1.

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Request for Information No. 64: (AMENDED AS AGREED) Please produce all documents relating to a written explanation, as referred to in PUC Rule 24.85(a)(4), of the construction required to provide sewer service to Lot 2 provided by Frisco to Ker-Seva, Ltd., ADC West Ridge, L.P., and/or Center for Housing Resources, Inc. or their representatives.

RESPONSE: As Ker-Seva, Ltd., ADC West Ridge, L.P., and/or Center for Housing Resources are not qualified applicants for service from the City, said rule is inapplicable. However, communications regarding service were provided in response to RFI No. 1.

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Request for Information No. 65: (AMENDED AS AGREED) Please produce all documents relating to the date of service, as referred to in PUC Rule 24.85(a)(5), by Frisco to provide retail water service to Lot 2 to Ker-Seva, Ltd., ADC West Ridge, L.P., and/or Center for Housing Resources, Inc. or their representatives.

RESPONSE: As Ker-Seva, Ltd., ADC West Ridge, L.P., and/or Center for Housing Resources are not qualified applicants for service from the City, said rule is inapplicable.

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Request for Information No. 66: (AMENDED AS AGREED) Please produce all documents relating to the date of service, as referred to in PUC Rule 24.85(a)(5), by Frisco to provide retail sewer service to Lot 2 to Ker-Seva, Ltd., ADC West Ridge, L.P., and/or Center for Housing Resources, Inc. or their representatives.

RESPONSE: As Ker-Seva, Ltd., ADC West Ridge, L.P., and/or Center for Housing Resources are not qualified applicants for service from the City, said rule is inapplicable.

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Request for Admission No. 32: Admit that Frisco has not provided a written explanation of the construction required to provide retail water service to Lot 2 to Ker-Seva, Ltd., ADC West Ridge, L.P., and/or Center for Housing Resources, Inc. or their representatives.

RESPONSE: Deny.

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Request for Admission No. 33: Admit that Frisco has not provided a written explanation of the construction required to provide retail sewer service to Lot 2 to Ker-Seva, Ltd., ADC West Ridge, L.P., and/or Center for Housing Resources, Inc. or their representatives.

RESPONSE: Deny.

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Request for Admission No. 34: Admit that Frisco has not provided to Ker-Seva, Ltd., ADC West Ridge, L.P., and/or Center for Housing Resources, Inc. or their representatives an expected date of retail water service to Lot 2.

RESPONSE: Admit, as the Complainants are not qualified applicants for service from the City of Frisco.

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Request for Admission No. 35: Admit that Frisco has not provided to Ker-Seva, Ltd., ADC West Ridge, L.P., and/or Center for Housing Resources, Inc. or their representatives an expected date of retail sewer service to Lot 2.

RESPONSE: Admit, as the Complainants are not qualified applicants for service from the City of Frisco.

Prepared/sponsored by: To be supplemented

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of September, 2016, a true and correct copy of the foregoing document has been sent via facsimile, electronic mail, first class mail, or hand-delivered to the following counsel of record:

Mr. Sam Chang
Public Utility Commission of Texas
1701 N. Congress Avenue
Austin, Texas
(512) 936-7261
e-mail: Sam.Chang@puc.texas.gov

Mr. Leonard Dougal
Ms. Mallory Beck
Jackson Walker, LLP
100 Congress Avenue, Suite 1100
Austin, Texas 78701
(512) 236-2000
e-mail: ldougal@jw.com

/s/ Arturo D. Rodriguez, Jr.

ARTURO D. RODRIGUEZ, JR.