



Control Number: 45870



Item Number: 52

Addendum StartPage: 0

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: /s/ Mallory Beck

Leonard Dougal - State Bar No. 06031400

Ali Abazari - State Bar No. 00796094

Mallory Beck - State Bar No. 24073899

100 Congress, Suite 1100

Austin, Texas 78701

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ATTORNEYS FOR COMPLAINANTS
KER-SEVA, LTD., ADC WEST RIDGE
VILLAS L.P., AND CENTER FOR HOUSING
RESOURCES, INC.

CERTIFICATE OF SERVICE

I hereby certify that the above and foregoing document was served as shown below on
this 14th day of October 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.change@puc.texas.gov
Attorney for Public Utility Commission of Texas

Via email and U.S. First Class Mail

/s/ Mallory Beck
Mallory Beck

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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: Jastinder Jawanda,
 Authorized Representative of Ker-Seva, Ltd.

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RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S FIRST SET OF
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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: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S FIRST SET OF
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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: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S FIRST SET OF
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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: Jastinder Jawanda
Authorized Representative of Ker-Seva, Ltd.

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RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S FIRST SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

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: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S FIRST SET OF
REQUESTS FOR INFORMATION AND REQUESTS FOR ADMISSION**

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: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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**BEFORE THE
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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 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: - Jastinder Jawanda
Authorized Representative of Ker-Seva, Ltd.

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RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S FIRST SET OF
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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: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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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: Terri Anderson
Authorized Representative of
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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: Jastinder Jawanda
Authorized Representative of Ker-Seva, Ltd.

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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.

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

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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: Terri Anderson
Authorized Representative of
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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: Jastinder Jawanda
Authorized Representative of Ker-Seva, Ltd.

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RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S FIRST SET OF
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Frisc0 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.

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

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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.

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

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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: Jastinder Jawanda
Authorized Representative of Ker-Seva, Ltd.

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RESOURCES, INC.'S RESPONSES TO CITY OF FRISCO'S FIRST SET OF
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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.

Prepared/Sponsored by: Jastinder Jawanda
Authorized Representative of Ker-Seva, Ltd.

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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.

Prepared/Sponsored by: Jastinder Jawanda
Authorized Representative of Ker-Seva, Ltd.

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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.

Prepared/Sponsored by: Jastinder Jawanda
Authorized Representative of Ker-Seva, Ltd.

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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: Jastinder Jawanda
Authorized Representative of Ker-Seva, Ltd.

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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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Authorized Representative of Ker-Seva, Ltd.

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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.

Prepared/Sponsored by: Jastinder Jawanda
Authorized Representative of Ker-Seva, Ltd.

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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.

Prepared/Sponsored by: Jastinder Jawanda
 Authorized Representative of Ker-Seva, Ltd.

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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:	Jastinder Jawanda Authorized Representative of Ker-Seva, Ltd.
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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: Jastinder Jawanda
Authorized Representative of Ker-Seva, Ltd.

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: Jastinder Jawanda
Authorized Representative of Ker-Seva, Ltd.

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

FORMAL COMPLAINT OF KER-SEVA
LTD. AGAINST THE CITY OF FRISCO
RFI, TEXAS

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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-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: Jastinder Jawanda
Authorized Representative of Ker-Seva, Ltd.

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:	Terri Anderson Authorized Representative of ADC West Ridge, L.P. & Center for Housing Resources, Inc.
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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 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: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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 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: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

**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:	Terri Anderson Authorized Representative of ADC West Ridge, L.P. & Center for Housing Resources, Inc.
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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: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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 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: Terri Anderson
 Authorized Representative of
 ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA
LTD. AGAINST THE CITY OF FRISCO
RFI, TEXAS

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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 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: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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
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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
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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:	Terri Anderson.
	Authorized Representative of
	ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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
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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:	Terri Anderson Authorized Representative of ADC West Ridge, L.P. & Center for Housing Resources, Inc.
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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
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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:	Terri Anderson Authorized Representative of ADC West Ridge, L.P. & Center for Housing Resources, Inc.
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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
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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: Terri Anderson
 Authorized Representative of
 ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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
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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:	Terri Anderson Authorized Representative of ADC West Ridge, L.P. & Center for Housing Resources, Inc.
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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: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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:	Terri Anderson Authorized Representative of ADC West Ridge, L.P. & Center for Housing Resources, Inc.
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PUC DOCKET NO. 45870
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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:	Terri Anderson Authorized Representative of ADC West Ridge, L.P. & Center for Housing Resources, Inc.
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PUC DOCKET NO. 45870
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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: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

PUC DOCKET NO. 45870
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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
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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:	Terri Anderson Authorized Representative of ADC West Ridge, L.P. & Center for Housing Resources, Inc.
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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
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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:	Terri Anderson Authorized Representative of ADC West Ridge, L.P. & Center for Housing Resources, Inc.
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PUC DOCKET NO. 45870
SOAH DOCKET NO. 473-16-4619.WS

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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
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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:	Terri Anderson Authorized Representative of ADC West Ridge, L.P. & Center for Housing Resources, Inc.
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PUC DOCKET NO. 45870
SOAH DOCKET NO. 473-16-4619.WS

FORMAL COMPLAINT OF KER-SEVA
LTD. AGAINST THE CITY OF FRISCO
RFI, TEXAS

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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
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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: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

PUC DOCKET NO. 45870
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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
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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:	Terri Anderson Authorized Representative of ADC West Ridge, L.P. & Center for Housing Resources, Inc.
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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
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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: Terri Anderson,
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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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
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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: Jastinder Jawanda
Authorized Representative of Ker-Seva, Ltd.

**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
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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: Jastinder Jawanda
Authorized Representative of Ker-Seva, Ltd.

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 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: Jastinder Jawanda
Authorized Representative of Ker-Seva, Ltd.

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 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: Jastinder Jawanda
Authorized Representative of Ker-Seva, Ltd.

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 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: Jastinder Jawanda
Authorized Representative of Ker-Seva, Ltd.

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 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: Jastinder Jawanda
Authorized Representative of Ker-Seva, Ltd.

**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 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: Jastinder Jawanda
Authorized Representative of Ker-Seva, Ltd.

**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 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: Jastinder Jawanda
Authorized Representative of Ker-Seva, Ltd.

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 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: Jastinder Jawanda
Authorized Representative of Ker-Seva, Ltd.

**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 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: Jastinder Jawanda
Authorized Representative of Ker-Seva, Ltd.

**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 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: Jastinder Jawanda
Authorized Representative of Ker-Seva, Ltd.

**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 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: Jastinder Jawanda
Authorized Representative of Ker-Seva, Ltd.

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 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: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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 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: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA
LTD. AGAINST THE CITY OF FRISCO
RFI, TEXAS

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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 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: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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 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: Terri Anderson
 Authorized Representative of
 ADC West Ridge, L.P. & Center for Housing Resources, Inc.

**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 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:	Terri Anderson Authorized Representative of ADC West Ridge, L.P. & Center for Housing Resources, Inc.
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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
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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: Terri Anderson
 Authorized Representative of
 ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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 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:	Terri Anderson Authorized Representative of ADC West Ridge, L.P. & Center for Housing Resources, Inc.
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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 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:	Terri Anderson Authorized Representative of ADC West Ridge, L.P. & Center for Housing Resources, Inc.
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**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 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: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

**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 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:	Terri Anderson Authorized Representative of ADC West Ridge, L.P. & Center for Housing Resources, Inc.
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**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 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:	Terri Anderson Authorized Representative of ADC West Ridge, L.P. & Center for Housing Resources, Inc.
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**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 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: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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 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: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

**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 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:	Terri Anderson Authorized Representative of ADC West Ridge, L.P. & Center for Housing Resources, Inc.
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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
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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: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

**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
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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: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

**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
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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:	Terri Anderson Authorized Representative of ADC West Ridge, L.P. & Center for Housing Resources, Inc.
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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 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: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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
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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: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

**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 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: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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
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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:	Terri Anderson Authorized Representative of ADC West Ridge, L.P. & Center for Housing Resources, Inc.
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**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
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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: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

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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 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:	Terri Anderson Authorized Representative of ADC West Ridge, L.P. & Center for Housing Resources, Inc.
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**PUC DOCKET NO. 45870
SOAH DOCKET NO. 473-16-4619.WS**

**FORMAL COMPLAINT OF KER-SEVA
LTD. AGAINST THE CITY OF FRISCO
RFI, TEXAS**

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**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 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: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

**FORMAL COMPLAINT OF KER-SEVA
LTD. AGAINST THE CITY OF FRISCO
RFI, TEXAS**

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**BEFORE THE
PUBLIC UTILITY COMMISSION
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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 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: Jastinder Jawanda
Authorized Representative of Ker-Seva, Ltd.

**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
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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: Jastinder Jawanda
Authorized Representative of Ker-Seva, Ltd.

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

FORMAL COMPLAINT OF KER-SEVA
LTD. AGAINST THE CITY OF FRISCO
RFI, TEXAS

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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
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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: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

FORMAL COMPLAINT OF KER-SEVA
LTD. AGAINST THE CITY OF FRISCO
RFI, TEXAS

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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
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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: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

**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
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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: Terri Anderson
Authorized Representative of
ADC-West Ridge, L.P. & Center for Housing Resources, Inc.

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

**FORMAL COMPLAINT OF KER-SEVA
LTD. AGAINST THE CITY OF FRISCO
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**BEFORE THE
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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
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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: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

**FORMAL COMPLAINT OF KER-SEVA
LTD. AGAINST THE CITY OF FRISCO
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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
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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: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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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
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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: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

**PUC DOCKET NO. 45870
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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
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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: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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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
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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: Jastinder Jawanda
Authorized Representative of Ker-Seva, Ltd.

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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
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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: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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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
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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: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
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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: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
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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: Jastinder Jawanda
Authorized Representative of Ker-Seva, Ltd..

PUC DOCKET NO. 45870
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FORMAL COMPLAINT OF KER-SEVA
LTD. AGAINST THE CITY OF FRISCO
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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
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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: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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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
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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: Terri Anderson
Authorized Representative of
ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
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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: Terri Anderson
 Authorized Representative of
 ADC West Ridge, L.P. & Center for Housing Resources, Inc.

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

RESPONSE:

Admit.

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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
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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.

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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.

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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.

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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.

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**KER-SEVA, LTD., ADC WEST RIDGE VILLAS, L.P. AND CENTER FOR HOUSING
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Frisco RFA 6: Admit that Lot 2 is located within the Property.

RESPONSE:

Admit.

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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.