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Item Number: 54

Addendum StartPage: 0

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

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

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PUBLIC UTILITY COMMISS
BEFORE THE FILING CLERK

PUBLIC UTILITY COMMISSION

OF TEXAS

**COMPLAINANTS' SUPPLEMENTAL RESPONSE TO ORDER NO. 3 AND
RULE 194.2 EXPERT DISCLOSURES**

TO: SERVICE LIST

COMES NOW, Complainants Ker-Seva Ltd., ADC West Ridge Villas, L.P., and Center for Housing Resources, Inc. (collectively, "Complainants"), and file this their Supplemental Rule 194.2 Expert Disclosures pursuant to Tex. R. Civ. P. 194.2(f) and Order No. 3 in this docket. Discovery is ongoing, and Complainants reserve the right to supplement and amend the responses contained herein.

Respectfully submitted,

JACKSON WALKER L.L.P.

By: Mallory Beck
Leonard Dougal - State Bar No. 06031400
Ali Abazari - State Bar No. 00796094
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AND CENTER FOR HOUSING
RESOURCES, INC.

CERTIFICATE OF SERVICE

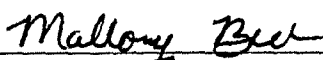
I hereby certify that the above and foregoing document was served as shown below on
this 26th day of October 2016:

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~~Ali Abazari~~ Mallory Beck

REQUESTS FOR DISCLOSURE

Request 194.2(f): For any testifying expert: (1) the expert's name, address, and telephone number; (2) the subject matter on which the expert will testify; (3) the general substance of the expert's mental impressions and opinions and a brief summary of the basis for them, or if the expert is not retained by, employed by, or otherwise subject to the control of the responding party, documents reflecting such information; (4) if the expert is retained by, employed by, or otherwise subject to the control of the responding party: (A) all documents, tangible things, reports, models, or data compilations that have been provided to, reviewed by, or prepared by or for the expert in anticipation of the expert's testimony; and (B) the expert's current resume and bibliography.

Response:

Levi Wild, P.E.
Sanchez & Associates
c/o Ali Abazari
Jackson Walker, L.L.P.
100 Congress Ave., Suite 1100
Austin, Texas 78701
T: (512) 236-2000

Levi Wild is a licensed professional engineer in the State of Texas. Mr. Wild has experience assessing the water and sewer capacity impact of multi-family, residential, and commercial developments to municipal water and sewer systems. Mr. Wild has worked with the City of Frisco in the planning and preparation of other developments within the City of Frisco's water and sewer CCNs.

Mr. Wild will provide expert testimony regarding the potential impact of Complainants' proposed development on the utility systems of the City of McKinney and the City of Frisco. Mr. Wild's opinions include that there is sufficient capacity within an existing sewer line along Westridge Boulevard to serve Complainants' proposed development, the water and sewer facilities owned by the City of Frisco and located next to the proposed development are sufficient to serve the proposed development, there are other avenues of connecting to the City of Frisco's water and sewer systems that are more efficient and reasonable than the avenue proposed by the City of Frisco, and that connecting to the City of Frisco's water and sewer infrastructure as proposed by the City of Frisco is not reasonable or necessary. Complainants will supplement this response if it becomes necessary. In addition, Mr. Wild may provide rebuttal expert testimony, if necessary.

Documents that have been provided to, reviewed by, or prepared by or for Mr. Wild include documents bates labeled ADC00056, ADC00407, ADC00696, and ADC01139-01141. Discovery is ongoing, and Complainants will supplement this response as required.

Perry Steger, P.E.
Steger Bizzell
c/o Ali Abazari
Jackson Walker, L.L.P.
100 Congress Ave., Suite 1100
Austin, Texas 78701
T: (512) 236-2000

Mr. Steger is a licensed professional engineer in the State of Texas. Mr. Steger received his Bachelor of Science in Civil Engineering from the University of Texas at Austin. Mr. Steger has over 30 years of experience as an engineer and has served as the President of Steger Bizzell Engineering for more than 10 years. In his role at Steger Bizzell, Mr. Steger has performed engineering design services for numerous public entities. Mr. Steger has experience in utility design, consulting, and planning for water and sewer utilities, including municipalities and provides engineering design and planning advice for water and sewer infrastructure projects, including for municipalities.

Mr. Steger may provide rebuttal expert testimony, if necessary.

A copy of Mr. Steger's resume was previously provided to the parties bates labeled ADC01142. Discovery is ongoing, and Complainants will supplement this response as required.

Jack Stowe
NewGen Strategies & Solutions
c/o Ali Abazari
100 Congress Ave., Suite 1100
Austin, Texas 78701
T: (512) 236-2000

Jack Stowe is the Director of the Environmental Practice at NewGen Strategies & Solutions. Mr. Stowe has extensive experience conducting rate studies and rate analyses in relation to determining appropriate water and sewer utility rates before the Public Utility Commission of Texas, contract negotiation support relating to utility services, and feasibility studies. Mr. Stowe is aware of the process for obtaining water and sewer service from municipalities and other water and sewer service providers.

Mr. Stowe will provide expert testimony regarding the requirements to obtain water and sewer service from a retail public utility and the obligations placed on a CCN holder to provide continuous and adequate water and sewer service. Mr. Stowe's opinion is that Complainants are qualified service applicants that submitted an application for utility services, and that the City of Frisco has not complied with its obligations to provide utility services. In addition, Mr. Stowe may provide rebuttal expert testimony, if necessary.

Documents that have been provided to, reviewed by, or prepared by or for Mr. Stowe include ADC00082-00121, ADC01093-01097, ADC01143-01147, P1746-1747, P3035-3038, P3064-3066, 23001-23211, 51001-51048, 52001-52038. In addition, and produced herewith, are

documents bates labeled ADC01290-01424. Discovery is ongoing, and Complainants will supplement this response as required.

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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 DOCUMENT PRODUCTION LOG**

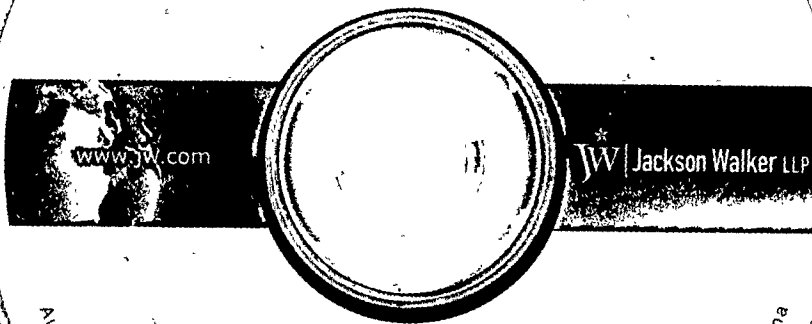
Frisco RFI #	Responsive Bates Numbers
1	ADC00001-00044
2, 3	ADC00045-00049
4, 7	ADC00050-00081
5, 8 6, 9	ADC00082-00087
10, 13	ADC00088-00275
11, 12, 14, 15	ADC00276-01022 ADC01100-01136 ADC01148-01289
52-54, 58-60, 64-66, 70-72, 76-78, 82-84	ADC00050-00081 ADC00082-00087 ADC00088-00275 ADC00276-01022 ADC01023-01097 ADC01137-01138
55-57, 61-63, 67-69, 73-75, 79-81, 85-87	ADC00088-00121 ADC01047-01069 ADC01070-01092
94	ADC00088-00121 ADC01098-01099
97-99	ADC00001-00044 ADC00045-00049 ADC01070-01092
101	ADC01047-01069 ADC00001-00044
Rule 194.2	Responsive Bates Numbers
	ADC01139-01147 ADC01290-01430

SUPPLEMENTAL DOCUMENTS PRODUCED WITH
COMPLAINANTS' SUPPLEMENTAL RESPONSE TO ORDER NO. 3 AND RULE 194.2
EXPERT DISCLOSURES

SUPPLEMENTAL RFD RESPONSES BATES LABELED ADC1290-1430
ARE CONTAINED ON ATTACHED CD

PUC Docket No. 45870
SOAH Docket No. 473-16-4619.WS

Supplemental Documents Produced with
Complainants' Supplemental Response to Order No. 3
and Rule 194.2 Expert Disclosures; Supplemental RFD
Responses bates labeled ADC1290-1430



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