WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: May 1, 2018 WITNESS: Susie Paul DOCKET: UT-171082 RESPONDER: Susie Paul REQUESTER: CenturyLink TELEPHONE: (360) 664-1105

REQUEST NO. 18:

Regarding Ms. Paul's direct testimony, SP-1T, page 18, lines 16-19, and page 21, lines 1-8, please provide a full and complete explanation of Staff's position with regard to the point(s) in time at which the lots in a "development" are not subject to the line extension rule, and the point(s) in time that each lot becomes subject to the line extension rule. Specifically,

- a. After the developer has established separate lots in the development;
- b. After the developer sells the lot to housing contractor;
- c. After the developer sells the lot to a consumer;
- d. After construction of a dwelling has commenced on the lot;
- e. After completion of construction of a dwelling on the lot;
- f. After local government authorizes human occupancy of the dwelling;
- g. After the dwelling is offered for sale to potential home owners or investors;
- h. After a housing contractor sells the lot with completed dwelling to a consumer or landlord:
- i. After the dwelling is occupied by a resident.

For each of these points in time explain how Staff concludes the line extension rule does or does not apply.

RESPONSE:

Objection: Not relevant to this issues in this proceeding with respect to subparts a through h. Only subpart i. reflects the fact scenario in this case.

With regard to subpart i., please refer to Ms. Paul's testimony at Exh. SP-1T at 21:1-8.