

**Exh. BF-3
Docket UT-210902
Witness: Bridgit Feeser**

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

**CENTURYLINK COMMUNICATIONS
LCC d/b/a LUMEN TECHNOLOGIES
GROUP; QWEST CORPORATION;
CENTURYTEL OF WASHINGTON,
INC.; CENTURYTEL OF INTER
ISLAND, INC.; CENTURYTEL OF
COWICHE, INC.; UNITED
TELEPHONE COMPANY OF THE
NORTHWEST,**

Respondents.

DOCKET UT-210902

EXHIBIT TO TESTIMONY OF

BRIDGIT FEESER

**STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

*Feb. 22, 2022, CenturyLink Response to UTC Staff Informal Data Request
in Docket UT-210902*

August 25, 2022

From: Sherr, Adam <Adam.Sherr@lumen.com>
Sent: Tuesday, February 22, 2022 8:05 AM
To: Hawkins-Jones, Jacque (UTC) <jacque.hawkins-jones@utc.wa.gov>
Cc: Namura, David <David.Namura@lumen.com>; Gose, Peter J <Peter.Gose@lumen.com>; Roberson, Jeff (UTC) <jeff.roberson@utc.wa.gov>; Feeser, Bridgit (UTC) <bridgit.feeser@utc.wa.gov>
Subject: RE: Data Request for UT-210902, Covid Disconnections

External Email

Jacque, good morning. I write to supplement our February 10, 2022 responses. I apologize for the delay. We expected to supplement by February 17. The delay is entirely my fault, and I sincerely apologize.

I have updated our responses below with the supplemental information for Questions 3 and 4. Please note that by providing these responses, CenturyLink in no way concedes that it is obligated to submit such responses pursuant to any Commission rule, statute, or order. CenturyLink is providing these responses for information only, and CenturyLink hereby reserves, and expressly does not waive, all rights, remedies, and defenses related to Staff's informal data requests or our responses thereto. Further, by providing such responses, CenturyLink does not grant or concede Commission jurisdiction over CenturyLink with regard to this proceeding or the subject matter thereof.



Adam L. Sherr
Assistant General Counsel
1600 7th Avenue Room 1506, Seattle, WA 98191
tel: 206-398-2507 | cell: 206-551-7615
adam.sherr@lumen.com

From: Sherr, Adam
Sent: Thursday, February 10, 2022 2:12 PM
To: Hawkins-Jones, Jacque (UTC) <jacque.hawkins-jones@utc.wa.gov>
Cc: Namura, David <David.Namura@lumen.com>; Gose, Peter J <Peter.Gose@lumen.com>; Roberson, Jeff (UTC) <jeff.roberson@utc.wa.gov>; Feeser, Bridgit (UTC) <bridgit.feeser@utc.wa.gov>
Subject: RE: Data Request for UT-210902, Covid Disconnections

Good afternoon, Jacque.

First, thank you for the extension to respond to Questions 3 and 4 below. We will endeavor to beat the February 17 deadline.

I write to provide responses to Questions 1 and 2. Please note that by providing these responses, CenturyLink in no way concedes that it is obligated to submit such responses pursuant to any Commission rule, statute, or order. CenturyLink is providing these responses for information only, and CenturyLink hereby reserves, and expressly does not waive, all rights, remedies, and defenses related to Staff's informal data requests or our responses thereto. Further, by providing such responses, CenturyLink does

not grant or concede Commission jurisdiction over CenturyLink with regard to this proceeding or the subject matter thereof.

1. Lumen's answer to the Commission's data requests in Docket U-200281 indicate that Lumen disconnected 407 customers, but that 243 of those customers "were already suspended for non-payment" before the Governor's disconnection moratorium became effective and "thus did not experience a change in availability as a result of moving from suspended to disconnected status." (Letter from Adam Sherr to Amanda Maxwell, dated October 12, 2021). Please confirm that telephone services become unavailable to customers placed in suspended status.

CenturyLink Response (February 10, 2022):

CenturyLink notes that the Governor's Proclamations did not restrict utilities from suspending customers for non-payment. It prohibited the following:

- (1) Disconnecting any residential customers from energy, telecommunications, or water service to due nonpayment on an active account, except at the request of the customer;
- (2) Refusing to reconnect any residential customer who has been disconnected due to nonpayment;
- (3) Charging fees for late payment or reconnection of energy, telecommunications, or water service; and
- (4) Disconnecting service to any residential customer who has contacted the utility to request assistance from that utility's COVID-19 Customer Support Program.

With that understanding, a "suspended" customer is one whose service can't be accessed/utilized, but who remains on the company's network. For example, that customer retains his/her phone number, and can reinstate active service by bringing past due balances current and by paying a small reconnection charge (\$20 or \$25). If a suspended customer does not make payment arrangements or otherwise bring balances current, the customer is ultimately "disconnected," meaning that the customer account is permanently removed from the company's network. A disconnected customer can re-establish service by following the same process as any other new customer establishing service, including paying applicable non-recurring charges. The disconnected customer may also be required to repay prior past due balances in order to re-establish service.

2. How many residential customers did Lumen place in suspended status during the effective period of the Governor's disconnection moratorium, March 23, 2020, through September 30, 2021. See Proclamation by Governor Jay Inslee, No. 20-23.2 – Ratepayer Assistance and the Preservation of Essential Services, at 4 (Apr. 17, 2020), as amended.

CenturyLink Response (February 10, 2022):

CenturyLink notes that the Governor's Proclamations did not restrict utilities from suspending customers for non-payment. See CenturyLink's response to Question 1. With that understanding, CenturyLink's estimate (based on data pulled in late 2021) is that 788 residential voice customers in Washington were suspended between April 2020 and September 2021. On average (under normal operating circumstances), approximately 1500 residential voice accounts per month are suspended for non-payment, meaning that absent CenturyLink's efforts to suppress suspensions, it is likely that 25,500 residential voice suspensions would have occurred.

3. Which Lumen operating companies (Qwest Corporation, CenturyLink Communications, LLC; CenturyTel of Washington, Inc.; CenturyTel of Inter Island, Inc.; CenturyTel of Cowiche, Inc.; and United Telephone Company of the Northwest) disconnected or suspended customers during the Governor's disconnection moratorium?

CenturyLink Response (February 10, 2022):

Consistent with Staff's extension, CenturyLink will supplement its response on or by February 17, 2022.

CenturyLink Supplemental Response (February 22, 2022):

Please see my email to you dated February 9, 2022 (below). In that email, I explained that, in order to address Questions 3 and 4, CenturyLink had to re-pull (and attempt to replicate) suspension/disconnection data that was last extracted in 2021. For a number of reasons (as explained in my February 9 email), it was not possible to precisely replicate the earlier figures, although the differences are fairly small. With that understanding, CenturyLink estimates that, for residential Washington voice services between late March 2020 and September 2021, the breakdown of suspensions and involuntary disconnects for nonpayment, by operating company, was as follows:

Company	Disconnects	Suspends
CenturyTel Inter-Island Inc	19	43
CenturyTel of Cowiche, Inc.	2	5
CenturyTel Washington, Inc.	115	382
Qwest Corporation	245	190
United Tele Co of Northwest-WA	42	123
Totals	423	743

4. For each of the operating companies identified above, please provide the following:
- How many customers were suspended?
 - How many customers were disconnected?

CenturyLink Response (February 10, 2022):

Consistent with Staff's extension, CenturyLink will supplement its response on or by February 17, 2022.

CenturyLink Supplemental Response (February 22, 2022):

See CenturyLink's response to Question 3.

LUMEN[®]



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From: Hawkins-Jones, Jacque (UTC) <jacque.hawkins-jones@utc.wa.gov>
Sent: Wednesday, February 9, 2022 2:17 PM
To: Sherr, Adam <Adam.Sherr@lumen.com>
Cc: Namura, David <David.Namura@lumen.com>; Gose, Peter J <Peter.Gose@lumen.com>; Roberson, Jeff (UTC) <jeff.roberson@utc.wa.gov>; Feeser, Bridgit (UTC) <bridgit.feeser@utc.wa.gov>
Subject: RE: Data Request for UT-210902, Covid Disconnections

Hi Adam,

Thank you for the email. We have reviewed your extension request and grant the one week extension for responses to questions 3 and 4. Those responses will now be due by close of business next week Thursday, Feb. 17.

The responses to questions 1 and 2 will still be due by close of business tomorrow, Feb. 10. Any supplemental responses may be provided when you submitted your responses next week.

If you have any questions, please let me know.
Thank you,

Jacque Hawkins-Jones

Compliance Investigator, Consumer Protection
(360) 664-1105 Office
Jacque.Hawkins-Jones@utc.wa.gov



This email/letter states the informal opinions of commission staff, offered as technical assistance, and are not intended as legal advice. We reserve the right to amend these opinions should circumstances change or additional information be brought to our attention. Staff's opinions are not binding on the commission.

From: Sherr, Adam <Adam.Sherr@lumen.com>
Sent: Wednesday, February 9, 2022 12:07 PM
To: Hawkins-Jones, Jacque (UTC) <jacque.hawkins-jones@utc.wa.gov>
Cc: Namura, David <David.Namura@lumen.com>; Gose, Peter J <Peter.Gose@lumen.com>; Roberson, Jeff (UTC) <jeff.roberson@utc.wa.gov>
Subject: RE: Data Request for UT-210902, Covid Disconnections

External Email

Hi Jacque:

The company is going to need additional time to respond to questions 3 and 4 below. We've been trying to extract the data you've requested *on an operating company basis*, but are experiencing difficulties. When we queried and researched our systems months ago to respond to Staff's earlier requests, we did so at a summary level and did not pull account level information (as account level information wasn't being requested). If we had pulled account level information, it would have been a somewhat simple exercise to link the operating company associated with each customer. In order to research and respond to questions 3 and 4 below, we have to effectively re-pull data, somewhat from scratch. Because of the complexity of the systems, it's very likely that counts will have changed since data was originally pulled. This stems from a number of factors, including continued account migration between our CRIS and ENS billing systems. Also, as part of our standard operations, accounts may have been reclassified by segment (e.g., an account that was deemed to be "residential" months ago may have been reclassified as "business" based on a shift in account attributes between data pulls). There has also been a fair amount of SME turnover, and all of this complicates the process of effectively trying to replicate Staff's earlier requests at a more detailed level.

Rather than simply giving up (and responding tomorrow that we are unable to break down the information requested by operating company), we'd like to ask for an additional week to respond. We can provide responses to 1 and 2 on the due date (tomorrow) or we can provide them all at the same time as we respond to 3 and 4. Let us know what you'd prefer.



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From: Hawkins-Jones, Jacque (UTC) <jacque.hawkins-jones@utc.wa.gov>
Sent: Thursday, January 27, 2022 9:30 AM
To: Namura, David <David.Namura@lumen.com>
Cc: Sherr, Adam <Adam.Sherr@lumen.com>
Subject: Data Request for UT-210902, Covid Disconnections

Good morning,

The Utilities and Transportation Commission is conducting an investigation into the business practices of CenturyLink Communications, LLC d/b/a Lumen Technologies (CenturyLink) related to customer disconnections during the Governor's disconnection moratorium.

Under Washington state law, RCW 80.04.090, the commission has the authority to inspect the accounts, books, papers, and documents of any telecommunications company doing business in this state.

In order to complete this investigation commission staff requires the following documents and information:

1. Lumen's answer to the Commission's data requests in Docket U-200281 indicate that Lumen disconnected 407 customers, but that 243 of those customers "were already suspended for non-payment" before the Governor's disconnection moratorium became effective and "thus did not experience a change in availability as a result of moving from suspended to disconnected status." (Letter from Adam Sherr to Amanda Maxwell, dated October 12, 2021). Please confirm that telephone services become unavailable to customers placed in suspended status.
2. How many residential customers did Lumen place in suspended status during the effective period of the Governor's disconnection moratorium, March 23, 2020, through September 30, 2021. See Proclamation by Governor Jay Inslee, No. 20-23.2 – Ratepayer Assistance and the Preservation of Essential Services, at 4 (Apr. 17, 2020), as amended.
3. Which Lumen operating companies (Qwest Corporation, CenturyLink Communications, LLC; CenturyTel of Washington, Inc.; CenturyTel of Inter Island, Inc.; CenturyTel of Cowiche, Inc.; and United Telephone Company of the Northwest) disconnected or suspended customers during the Governor's disconnection moratorium?
4. For each of the operating companies identified above, please provide the following:
 - a. How many customers were suspended?
 - b. How many customers were disconnected?

Please provide all requested information to me no later than **February 10, 2021**, in electronic format using Microsoft Word for narrative documents and Excel for data. Extension requests may be granted on a case-by-case basis. A request for extension must be made in writing prior to the deadline and must include the reason for the extension.

If you have any questions or concerns, please contact me directly using the contact information below.

Thank you,

Jacque Hawkins-Jones
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