

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF
RESPONSES TO DATA REQUESTS

DATE PREPARED: September 22, 2022
DOCKET: UT-181051
REQUESTER: CenturyLink

WITNESS: Commission Staff
RESPONDER: Commission Staff

CENTURYLINK DATA REQUEST NO. 26:

Does Mr. Akl agree with CLC witness Steven Turner that it is appropriate and reasonable for companies to operate sophisticated equipment according to the factory settings and supplier guidelines? If your answer is other than yes, fully explain your response.

RESPONSE:

Staff objects to this request as overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and/or not proportionate to the needs of the case. Staff further objects to this request to the extent it requests more than is required by the Commission's rules and orders. Staff further objects to this data request to the extent that the information it seeks is protected by attorney client privilege and/or the work product doctrine. Staff further objects to the data request to the extent that the Company is asserting/assuming the existence of facts. Staff further objects to this request to the extent it seeks speculative and/or hypothetical information.

Without waving the above objections, Staff responds as follows:

Dr. Akl's opinions are in his testimony.