WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: June 28, 2002 WITNESS: Robert Shirley CASE NO.: UT-011439 RESPONDER: Robert Shirley REQUESTER: Qwest TELEPHONE: (360) 664-1292

QWEST DATA REQUEST NO. 22:

Please name each person with whom Mr. Shirley consulted concerning the estimate that it would cost Qwest \$150,000 to extend service to the occupants of the Timm Ranch.

RESPONSE:

This estimate was based on Mr. Shirley's knowledge and experience with previous line extension cases. The reasonableness of the estimate of \$150,000, made in Staff's Open Meeting Memo (January 9, 2002), is confirmed by Testimony of Mr. Spinks in April. He stated: "The Timm Ranch buried cable line extension construction cost is estimated at \$29,383 which is actually less than the historical cost of placing buried facilities. The historic cost for aerial plant has been \$25,805 per mile while the Nelson aerial line extension cost is estimated at \$19,402 per mile which again, is significantly lower than the historic cost." Unless Qwest's costs are substantially higher than those of Verizon, applying the estimate to Qwest in January, as Staff also did to Verizon, was reasonable.