

**BEFORE THE WASHINGTON
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Complainant,

v.

CENTURYLINK COMMUNICATIONS, LLC

Respondent.

DOCKET UT-210902

**CROSS-ANSWERING TESTIMONY OF COREY J. DAHL
ON BEHALF OF THE
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL
PUBLIC COUNSEL UNIT**

EXHIBIT CJD-8

CenturyLink Response to Public Counsel Data Request No. 5

February 17, 2023

To: Public Counsel
Re: Docket UT-210902
CenturyLink's Responses to Public Counsel DR Nos. 1-7
January 26, 2023
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**PC-5 Re: Response Testimony of Peter J. Gose, Exh. PJG-1T, at 13:8-9.
Please provide the basis or rationale for CenturyLink's alternative proposal of a \$100 penalty per violation.**

RESPONSE:

Refer to Mr. Gose's testimony. In summary, no penalty is appropriate given that there is no likelihood of recurrence, as Public Counsel has admitted (see Dahl Response Testimony, p.19:16-18 ("At this time, it is unknown if a public health and economic crisis on the same scale as COVID-19 will emerge in the future, so it is equally unknown if the Company will face a similar Proclamation or requirement to cease disconnection and fee collection.")). If the Commission nevertheless imposes a penalty, the minimum penalty is appropriate given that the violations were clearly unintentional, CenturyLink took great efforts to suppress suspensions/disconnections (and suppressed 96% and 98%, respectively) and the company was under tremendous resource strain while attempting to comply with varying *ad hoc* restrictions across numerous jurisdictions.

**Respondent(s): CenturyLink Legal
Peter Gose, Director State and Local Government Affairs**