

**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-4

CenturyLink Response to Public Counsel Data Request No. 1

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-1 Re: Response Testimony of Peter J. Gose, Exh. PJG-1T, at 7:12-18.

Please provide the following information:

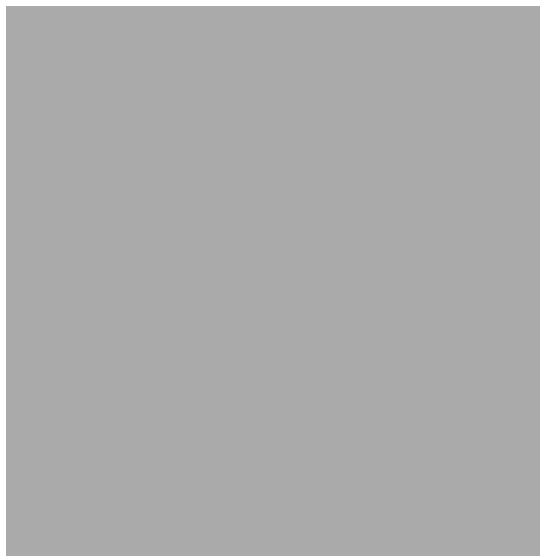
- a) Define "suppressed" as included in Witness Gose's testimony.**
- b) Practically, in terms of CenturyLink's operations, what does it mean to "suppress" a disconnection? Please explain with particularity.**
- c) Define "involuntary disconnection." How does this differ from a "voluntary disconnection"? Please explain with particularity.**
- d) Please explain, in detail, why there is a difference between 96% of suspensions suppressed at 7:12 and 98% of suspensions suppressed at 7:17.**
- e) Provide all documentation, data, and workpapers the Company used to project the percentage of suspensions that did not occur during the effective period of the Proclamation.**

RESPONSE:

- a) The term "suppressed," as included in Mr. Gose's testimony, means "prevented."
- b) It means to prevent the disconnection.
- c) An involuntary disconnection is one where the company, and not the customer, opts for disconnection. In some cases, customers request to disconnect service. This can happen for a number of reasons.
- d) The reference on 7:17 is a typographical error. The word "suspensions" should be replaced with "disconnections."
- e) CenturyLink objects to this request on the basis that it is overly broad and unduly burdensome. Without waiving its objections, CenturyLink responds as follows:

Despite a diligent search, CenturyLink was unable to locate contemporaneous records relating to the analysis done in late 2021. The personnel who ran the analysis are no longer with the company, and we lack access to those records. We have re-run a query of 2019 disconnects and suspensions to serve as a reasonable pre-COVID proxy. It shows the following, with the average number of suspensions being higher than CenturyLink estimated in testimony and the average number of disconnections being slightly lower than CenturyLink estimated in testimony. In both cases, the number of actual involuntary disconnections and suspensions is a small fraction of what the company would have expected and experienced during normal operations. CenturyLink is not minimizing the effect of suspensions/disconnections on affected customers. Its point is that our efforts to suppress involuntary service interruptions were largely successful despite the extreme difficulty of the circumstances.

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

**Shaded Information is Designated as Confidential per
Protective Order in Docket UT-210902**

REDACTED VERSION