

**BEFORE THE WASHINGTON STATE UTILITIES AND TRANSPORTATION  
COMMISSION**

In the Matter of the Petition of:

QWEST CORPORATATION

To be Regulated Under an Alternative  
Form of Regulation Pursuant to RCW  
80.36.135.

DOCKET NO. UT-061625

PUBLIC COUNSEL'S MOTION  
FOR APPROVAL OF LATE FILING  
OF SPECIFIED DOCUMENTS

On January 29, 2007, pursuant to the January 25 notice in this matter, Public Counsel filed electronic copies of confidential testimony and exhibits in this docket for Dr. Robert Loube and Ms. Mary Kimball. However, the filings did not contain all required component documents. Pursuant to WAC 480-07-375(1)(b) and 480-07-385, Public Counsel respectfully requests permission for late filing of the following documents related to Public Counsel's testimony in this matter:

1. Working copies of spreadsheets with formulae intact. Copies of all Dr. Loube's exhibits, including PDF copies and non-working Excel files, were filed by the January 29 deadline. Working copies of Excel spreadsheets for Dr. Loube's Exhibit Nos. \_\_\_\_ (RL- 5) through (RL-10), were not filed, however, as required by WAC 480-07-140(6)(b). Due to the number of spreadsheets and the need to complete the narrative testimony, Dr. Loube was unable to provide working copies of the spreadsheets to Public Counsel in time for electronic filing on Monday. In addition, Dr. Loube is testifying in another matter in Michigan on January 29 and 30. It is Public Counsel's understanding that Dr. Loube will be able to provide the working

spreadsheets to Public Counsel for filing with the Commission and service to the parties no later than Thursday, February 1.

2. Redacted non-confidential versions of the testimony and exhibits of Dr. Loube and Ms. Kimball. Public Counsel made every effort to file all materials by the deadline but, due to the amount of confidential information to be redacted and the need to finalize confidential testimony and exhibits for today's filing was unable to finish document redaction and preparation of non-confidential versions in time. Public Counsel respectfully requests permission to file the redacted non-confidential versions of all testimony and exhibits electronically and in hard copy on Tuesday, January 30 by 5 p.m.

Public Counsel does not anticipate that the short delay in filing will materially prejudice any party. Public Counsel respectfully requests that the motion be granted.

Dated this 29th day of January, 2007.

ROBERT M. MCKENNA  
Attorney General

Simon J. ffitch  
Assistant Attorney General  
Public Counsel