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June 28, 2022

VIA E-FILING PORTAL

Washington Utilities and Transportation Commission
PO Box 47250
621 Woodland Square Loop SE
Lacey, WA 98503

Received
Records Management
06/28/22 10:00
State Of WASH.
UTIL. AND TRANSP.
COMMISSION

RE: 2022 ETC Re-Certification Request and Annual Reports (REDACTED)

Dear Sir or Madam:

Pursuant to WAC 480-123-060, Columbia Energy, LLC ("Columbia"), by its attorney and pursuant to WAC 480-07-160, respectfully request that the Washington Utilities and Transportation Commission ("Commission") certify to the Federal Communications Commission and the Universal Service Administrative Company that Columbia has met the requirements of 47 CFR § 54.314 for eligibility for receipt of federal high-cost funds.

Provided with this letter are the annual reports and officer certifications specified in WAC 480-123-060 through WAC 480-123-080. This re-certification will benefit the public interest by increasing the availability, reliability, and quality of voice and internet services in rural communities and to ensure that these communities have access to what the state and federal government consider to be modern internet speeds. Please note that Exhibit B to the report contains proprietary financial information that is deemed confidential and is marked as such. This is a new filing that I understand will require a new docket number to be assigned.

Please contact Bob Greene at 509-526-1025 if you should have any questions or requests for additional information.

Very truly yours,

WITHERSPOON • KELLEY

By: 
ALEX M. WILSON

AMW:tme
Enclosures
cc: Client

COLUMBIA ENERGY, LLC
Annual Eligible Telecommunications Carrier Report for 2021 and Annual Plan

Columbia Energy, LLC ("Columbia"), submits its Annual Eligible Telecommunications Carrier Report for 2021 ("2021 Report") and Annual Plan in accordance with WAC 480 123-030 through WAC 480-123-080.

I. COLUMBIA ETC REPORT FOR 2021

A. Annual Certification for Eligible Telecommunications Carrier

With this filing, Columbia requests continued certification as an ETC in Washington. In accordance with WAC 480 123-060, Exhibit A attached hereto contains a certification that all federal high cost support provided to Columbia (as an ETC within Washington state) was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

B. Report Required by WAC 480-123-070 for Calendar Year 2021

Columbia received an ETC designation in 2021 in connection to being the winning bidder in the Rural Digital Opportunity Fund Phase I Auction ("ROOF support"). Columbia has begun its initial operations in the State of Washington but has not yet commenced construction of the necessary improvements in the assigned census blocks in Washington state, and accordingly, it has not provided any services.

I. Report on use of federal funds and benefit to customers.

Information on the amount of ROOF support received and the capital expenditures made in Washington to build Columbia's necessary equipment is available in CONFIDENTIAL EXHIBIT B. Columbia did not receive any support relating to high cost services other than ROOF support.

2. Local service outage report.

Columbia did not provide services to customers in 2021, so there were no outages as defined by WAC 480-123-70 Section 2(a) to report.

3. Report on failure to provide service.

Columbia is in the process of building out its service area, and it did not receive any requests for service in its ETC service area in 2021.

4. Report on complaints per one thousand connections (fixed or mobile).

Columbia did not receive any complaints from ETC customers in 2021.

5. Certification of compliance with applicable service quality standards and consumer protection rules.

Columbia is still building out its ETC service area and has not yet provided ETC services to customers. Columbia will comply with applicable service quality standards and consumer protection rules. Currently, Columbia employs customer service representatives who are available and capable of addressing the terms of service, rates/charges, disputes, and other matters.

6. Certification of ability to function in emergency situations.

Columbia is still building out its ETC service area and is not yet providing ETC services. Columbia will have the ability to function in emergency situations and will adhere to the standards found in WAC 480-123-030(1)(g).

Specifically, in emergency situations, Columbia will first rely upon backup power through batteries which are designed to sustain facility operations for five (5) hours. The available batteries support the equipment and use rectifiers at n+1 to charge the batteries. Electrical Power is continuously monitored "24/7" with portable generators available to recharge batteries and operate the facilities for periods beyond the battery's capacity.

To ensure the portable generators are operating within one-half of the expected battery reserve time, after 15 minutes of a continuous power outage on-call staff is notified and will take the following action: First, notify the power company of the outage and assess the time for power restoration. If electric power is not restored within one hour, a portable generator will be installed at the site. Columbia represents that generator delivery and installation to a site will occur within three (3) hours of notice that commercial power is not available. For this purpose, Columbia has an inventory of 5 portable generators.

For that portion of fiber lines that are leased from other telecommunications wholesalers, Columbia will monitor and obtain assurances from the same to comply with WAC 480-120-411.

7. Advertising certification.

Columbia is in the process of building out its ETC service area. Columbia will advertise the availability of its applicable telephone assistance programs, such as Lifeline, in a manner reasonably designed to reach those likely to qualify for service, including residents of federally recognized Indian reservations within Columbia's designated ETC service area. Columbia will also publish advertisements that are likely to reach those who are not current customers of Columbia within its designated ETC service area. Columbia plans to advertise its services on its website, through local media, and other community outlets.

II. WAC 480-123-080 ANNUAL PLAN FOR UNIVERSAL SERVICE SUPPORT EXPENDITURES.

Columbia anticipates using the funds received in connection with the RDOF support to continue to build out its network where it has ETC designation in the state of Washington. Other than from RDOF support, Columbia does not anticipate receiving material federal high cost support in 2022 or 2023. Both the total and RDOF fund expenditures projected for 2022 and 2023 are discussed in CONFIDENTIAL EXHIBIT B.

Columbia did not receive any support prior to March 2022, however in 2021 Columbia signed and started the engineering and planning, as detailed in CONFIDENTIAL EXHIBIT B. Columbia has all permits and pole attachments in hand, ordered and received all the material necessary to start construction. Construction bids have been sent and received with contracts in process between contractor and Columbia.

The development and construction of the equipment necessary for Columbia to provide its ETC services certainly provides benefits to its customers. Columbia is expecting to finish its primary construction of its service area and be providing its customers 1Gbps symmetrical services by first quarter of 2023.

The benefits to consumers are numerous with every customer in the ETC area provided with 1Gbps internet service. Lifeline services will be advertised and provided as required.

EXHIBIT A
Declaration of Columbia Energy, LLC
ETC Certification

I, Scott Peters, am the Chief Executive Officer of Columbia Energy, LLC (the "Company"). I am authorized to make this Declaration on behalf of the Company, and that I certify or declare under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct to the best of my knowledge, information, and belief.

1. In 2021, the Company used all federal universal service high-cost support received in the preceding year only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.
2. The Company will use any federal universal service high-cost support it received or will receive in 2022 and 2023 only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.
3. The Company has materially complied with all requirements of WAC 480-123-060 through WAC 480-123-080.
4. The Company will comply with all service quality standards and consumer protection rules applicable to its ETC services.
5. The Company will have adequate amounts of back-up power to ensure functionality without an external power source. Power outage protection will be available at all sites by means of battery back-up for a minimum of five (5) hours. Portable generator hookups will be available for extended outage periods.
6. The Company will advertise the availability of its applicable telephone assistance programs, such as Lifeline, in a manner reasonably designed to reach those likely to qualify for service, including residents of federally recognized Indian reservations within the Company's designated ETC service area. The Company will also publish advertisements that are likely to reach those who are not current customers of the Company within its designated ETC service area.

SIGNED this 20 day of June, 2022 at Bellevue, WA County, King



seen PETERS
Chief Executive Officer

CONFIDENTIAL EXIHBIT B

[REDACTED]

[REDACTED]

[REDACTED]

Shaded information is designated as confidential per \\AC 480-07-160