

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

**CENTURYLINK COMMUNICATIONS
LCC d/b/a LUMEN TECHNOLOGIES
GROUP; QWEST CORPORATION;
CENTURYTEL OF WASHINGTON,
INC.; CENTURYTEL OF INTER
ISLAND, INC.; CENTURYTEL OF
COWICHE, INC.; UNITED
TELEPHONE COMPANY OF THE
NORTHWEST,**

Respondents.

DOCKET UT-210902

CROSS-EXAMINATION EXHIBIT OF

COREY J. DAHL

**ON BEHALF OF
CENTURYLINK**

March 14, 2023

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

Docket UT-210902

Washington Utilities & Transportation Commission v. CenturyLink Communications, LLC

**RESPONSE OF PUBLIC COUNSEL TO CENTURYLINK
DATA REQUEST NO. 1**

Request No: 1
Directed to: Public Counsel
Date Received: March 1, 2023
Date Produced: March 8, 2023
Prepared by: Corey Dahl
Witnesses: Corey Dahl

CENTURYLINK DATA REQUEST NO. 001:

RE: Exh. CJD-3T at 11:8-10

In Exh. CJD-3T at 11:8-10, Mr. Dahl states, “While everyone hopes for the best, it is dubious to claim confidently that we will never face a public health, public safety, or economic crisis that warrants such a necessary, life-saving response from our elected officials.” Please provide examples prior to COVID-19 of a public health, public safety, or economic crisis that warranted an emergency proclamation prohibiting disconnections in a manner similar to Proclamation 20-23.2.

PUBLIC COUNSEL’S RESPONSE:

Mr. Dahl’s statement was forward looking. The COVID-19 pandemic was extraordinary in its breadth and scope, and there is no certainty that a similar circumstance will not take place in the future. Whether a similar event took place prior to 2020 is immaterial. Moreover, the Washington Governor has the ability to declare a state of emergency under certain circumstances and may do so in the future if circumstances warrant.

To: Donna L. Barnett, CenturyLink Communications, LLC
Re: Docket UT-210902 Public Counsel Responses to CenturyLink DR Nos. 1 – 6
Date: March 8, 2023
Page 1 of 1