

**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. 6**

Request No: 6
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. 006:

Please see the following:

- Exh. CJD-3T at 2:4: “My testimony addresses the requests for mitigation presented by Peter Gose.”
 - Exh. CJD-3T at 10:10-12: “The Commission should ignore CenturyLink’s request for mitigation because its corrective action was both incomplete and inadequate.”
 - Exh. CJD-3T at 14:18: “The Commission should reject CenturyLink’s request for mitigation.”
 - Exh. CJD-3T at 15:8-9: “My testimony refutes the Company’s request for mitigation...”
 - Exh. CJD-3T at 15:11: “Not only should the Commission reject CenturyLink’s request for mitigation...”
 - Exh. CJD-3T at 16:3-4: “Furthermore, the Commission should not be persuaded by the Company’s arguments for full or 90 percent mitigation.”
- a) Please provide citations to any request for mitigation by Peter Gose in either his prefiled response testimony, Exh. PJG-1T, or cross-answering testimony, Exh. PJG-3T.
- b) Please provide the penalty assessment Public Counsel claims CenturyLink is requesting mitigation from.

PUBLIC COUNSEL’S RESPONSE:

- a) Exh. PJG-1T at 3:10-16. Additionally, the balance of Peter Gose’s testimony addressed factors considered by the Commission in determining the appropriate

To: Donna L. Barnett, CenturyLink Communications, LLC
Re: Docket UT-210902 Public Counsel Responses to CenturyLink DR Nos. 1 – 6
Date: March 8, 2023
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penalty to impose on companies for statute, rule, and order violations. Exh. PJG-3T at 1:18-20 proposes a 90 percent mitigation of the full (\$1,000 per violation) penalty in the event the Commission decides to issue penalties.

- b) The penalty at issue in this matter is \$923,000 for 923 violations.