

Exhibit ___-T (TLS-3T)
Docket No. UT-011439
Witness: Thomas L. Spinks

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition of
VERIZON NORTHWEST, INC.
For waiver of WAC 480-120-071(2)(a).

Docket No. UT-011439

REPLY TESTIMONY OF

Thomas L. Spinks

STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION

September 20, 2002

1 **Q. Please state your name and business address.**

2 A. My name is Thomas L. Spinks, my business address is 1300 South Evergreen Park Drive
3 Southwest, P.O. Box 47250, Olympia, Washington 98504. My e-mail address is
4 tspinks@wutc.wa.gov.

5
6 **Q. By whom are you employed and in what capacity?**

7 A. I am employed by the Washington Utilities and Transportation Commission as a
8 Regulatory Consultant.

9
10 **Q. Have you previously filed testimony in this case?**

11 A. Yes, I filed testimony addressing Verizon's estimate of the cost to provide line extensions
12 for which waivers are being requested in this case.

13
14 **Q. What is the purpose of your testimony at this time?**

15 A. The purpose of my testimony is to address Qwest's estimate of cost for the Timm Ranch
16 line extension.

17
18 **Q. Does the estimated cost of the line extension appear reasonable?**

19 A. Yes. Qwest witness Mr. Hubbard provided a cost estimate for the Timm Ranch line
20 extension of \$738,875. (See Ex.__(RJH-2).) This cost includes both reinforcement of
21 existing facilities as well as the line extension and covers a distance of 23.67 miles. The
22 cost per mile for the line extension and reinforcement is \$31,216, which is lower than

1 historical buried plant construction cost, and roughly the same cost per mile as was
2 estimated by Verizon.

3

4 **Q. Mr. Hubbard, at pages 16-17 of his testimony, states that the facilities will not be**
5 **used to provide service to any Qwest customers. Please comment.**

6 A. What is clear is that Mr. Hubbard has designed the line extension reinforcement without
7 consideration of the possibility that the reinforcement could also serve Qwest customers.

8 Since the proposed route follows existing facility paths, Qwest could, with minimal
9 additional expense, add a cross-connect facility that would allow existing Qwest
10 customers to also use the reinforced portion of the new facility.

11

12 **Q. Do you have any further testimony at this time?**

13 A. No.