



STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

621 Woodland Square Loop S.E. • Lacey, Washington 98503

P.O. Box 47250 • Olympia, Washington 98504-7250

(360) 664-1160 • TTY (360) 586-8203

April 28, 2020

Mark L. Johnson, Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop S.E., Lacey, WA 98503
P. O. Box 47250
Olympia, Washington 98504-7250

RE: Frontier Compliance Condition 7.d.
Docket UT-190574

Dear Mr. Johnson:

On February 19, 2020, the Washington Utilities and Transportation Commission (Commission) entered Order 03, ORDER APPROVING SETTLEMENT AGREEMENTS AND GRANTING APPLICATION FOR TRANSFER OF CONTROL, (Order 03) in the above-referenced docket. Order 03, among other things, required Frontier (Company) to submit a report relating to the readiness of the replicated Operations Support Systems (OSS) prior to the transfer.¹

BACKGROUND

In accordance with Order 03, Frontier filed the required OSS replication report. Condition 7.d. in the Settlement Agreement Conditions in part states:

7.d. Operations Support Systems – Frontier must complete system testing and issue a report to the Commission validating that the OSS are operational in accordance with the terms of the purchase agreement at least five days prior to close.

RECOMMENDATION

Based on UTC Staff's review of the reports filed on April 24, 2020, in this docket; Staff believes that Frontier has complied with Condition 7.d. Therefore, Staff recommends that the Commission issue a compliance acknowledgement letter recognizing that Frontier has complied

¹ Order ¶11.G. and Settlement, Exh. JP-4S, Attachment A, § 7.d.

with its obligation to file its OSS stand-up report consistent with Order 03 and Condition 7.d. of the adopted Settlement Agreement because the report shows that there has been no material degradation from benchmark to production mode on the replicated systems and the replicated systems are fully operational prior to the anticipated closing date of April 30, 2020.

Sincerely,

Tim Zawislak
Senior Regulatory Analyst