

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION

Complainant,

v.

VERIZON NORTHWEST INC.,

Respondent.

DOCKET NO. UT-040788

MOTION TO COMPEL  
VERIZON NW TO FILE A  
COMPLETE RESPONSE TO  
BENCH REQUEST NO. 2

1           This Motion is filed on behalf of Commission Staff. Staff seeks the relief  
described in ¶ 13 below.

2           This Motion places into issue no particular Commission rules or statutes.

**FACTS**

3           In Bench Request No. 2, the Commission asked Verizon NW to “update [its]  
response to Staff Data Request No. 276(e) to include the requested Balance Sheet  
and Income Statement information at a Washington intrastate level.”

4           Staff's Data Request No. 276 was issued June 8, 2004. The Company's initial  
response to Staff Data Request No. 276 was dated June 22, 2004, and for part (e) the  
Company stated: "Income Statement and Balance Sheet are not maintained at an  
intrastate level."

5           During the hearings of August 10-13, Verizon NW for the first time indicated  
its response to part (e) of this Data Request was wrong, hence Bench Request No. 2.

6           The Company filed its response to Bench Request No. 2 on August 17, 2004.  
The Company's response purports to be a balance sheet and income statement for  
Washington intrastate.

7           However, the documents the Company supplied do not contain certain  
information. According to the Verizon Northwest Inc. Washington Chart of  
Accounts, Verizon maintains Approximately 150 separate income and expense  
accounts. For the income statement the Company supplied in response to Bench  
Request No. 2, the amounts shown are at a level that makes it difficult, if not  
impossible, to determine what Verizon accounts are being included and excluded.

8           For the balance sheet included in Verizon's response, there are no amounts  
shown for numerous balance sheet accounts maintained by Verizon NW for its  
Washington operations. In the asset category, these include accounts for cash,  
accounts receivable, temporary investments, notes receivable, inventories,  
prepayments, investments in affiliated companies, non-regulated investments,

unamortized debt issuance expense, deferred maintenance and retirements, deferred charges, and other jurisdictional assets.

9           In the liability category of the balance sheet, the Company's response to Bench Request No. 2 does not show amounts for accounts payable, notes payable, advance billing and payments, customer deposits, capital leases, long term debt, premiums and discounts on long-term debt, advances from affiliated companies, other long term liabilities, and other jurisdictional liabilities.

10           The Company also excludes any equity accounts, which include capital stock, additional paid-in capital, treasury stock, and retained earnings. In addition, there is no explanation for the source of the amounts that are reflected on the response, or how they were developed.

### **ARGUMENT**

11           As the foregoing facts demonstrate, the Company's response to Bench Request No. 2 is incomplete. The Commission and the parties are entitled to a complete response.

12           The Commission has afforded the parties no opportunity to cross-examine the Company on this response. It should not be allowed into the record until it is complete, and then only if there is no need for cross-examination.

## RELIEF SOUGHT

13           The Commission should order Verizon NW to provide a complete response to Bench Request No. 2. At a minimum, the Commission should order the Company to provide the information listed in paragraphs 7-10 above.

DATED this 18<sup>th</sup> day of August, 2004.

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Attorney General

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