



**CENTURYLINK**  
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**Lisa A. Anderl**  
Assistant General Counsel  
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February 14, 2019

*Via Web Portal*

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State Of WASH.  
UTIL. AND TRANSP.  
COMMISSION

Mr. Mark L. Johnson  
Executive Director and Secretary  
Washington Utilities & Transportation Commission  
1300 S. Evergreen Park Drive SW  
P.O. Box 47250  
Olympia, Washington 98504-7250

**Re: Docket No.: UT-180831  
Supplemental Response**

Dear Mr. Johnson:

CenturyLink is writing to follow up on its February 7, 2019 filing in this docket, in which we committed to respond by February 15, 2019 with further information from our analysis of contractor invoices for the placement of buried service wire.

We discussed these invoices during the workshop, and at that time they seemed like a promising source of information for line extension information. We have since reviewed over 100 of these records, and can now say that these do not constitute line extensions as defined in the rule. Rather, they are new, or replacement drop facilities as those facilities are defined in WAC 480-120-021 and -071.

CenturyLink has explored other options for obtaining the information requested for the length and cost of line extensions under 1,000 feet, but has not been able to do so, as that information is not specifically tracked. CenturyLink would offer that the buried service wire jobs totaled \$46,000 for 101 jobs – this included work in King and Pierce County in December. CenturyLink did not pursue obtaining statewide data once we determined that the information was for the placement of drops, not line extensions.

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Please let me know if you have any other questions.

Sincerely,

*/s/ Lisa A. Anderl*

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