

ATTACHMENT 6

Data Request No. 418



972
(EXCERPT)

Christine O. Gregoire

ATTORNEY GENERAL OF WASHINGTON

Utilities and Transportation Division

1400 S Evergreen Park Drive SW • PO Box 40128 • Olympia WA 98504-0128 • (360) 664-1183

September 13, 2004

Sent Via E-mail, Facsimile, and U S Mail

Gregg E. Diamond
Director, Regulatory
MC: HQE02E84
600 Hidden Ridge
Irving, TX 75038

Re: *Verizon Rate Case*
Docket No. UT-040788
WUTC Staff *General* Data Request Nos. 414-428

Dear Mr. Diamond:

To facilitate the Washington Utilities and Transportation Commission (WUTC or Commission) Staff's examination in Docket No. UT-040788, please provide responses to each of the following requests on separate sheets of paper, and repeat the data request at the top of the page on which the response begins. Also, indicate on both the hard copy and any electronic version provided, the date the data response was prepared, the individual who prepared the response, the telephone number of the preparer, and the witness who will stand cross-examination on the response.

These data requests are governed by Commission rules, including WAC 480-07-400 and 405. Each of these data requests relates to the Company's request for general rate relief.

The term "documents" is used in its broadest sense, and includes all writings and records of any type in your possession, control or custody, including paper documents, emails, electronic files or computer data of any type, mechanical or electric recordings, etc., and any copies of the foregoing. A document with handwritten notes on it is not a copy of the document on which it is written, but a separate document. If there is any question whether a responsive item is a "document," assume it is and produce it.



If you refuse to respond to any data request, or if you cannot respond fully to any data request, please provide as complete a response as you are capable, and state all reasons why a full response is not forthcoming. If you object to any data request, you must do so within the time limits prescribed by WAC 480-07-405. If you object on the basis of privilege, state the privilege, describe the responsive documents and name each person who has possessed it. If a document is unavailable, identify it, and state why. If it can be obtained elsewhere, please state where. If a responsive document has been destroyed, please describe the document and explain in detail how and why, identify who did it, and who has knowledge of the document's contents.

If a data request can be answered in whole or in part by a response to another data request, please so state and cite the specific part of that other data request that is responsive. If that other data request only responds to part of the data request, please proceed to answer the remaining parts of the data request.

You have a duty to supplement your responses, per WAC 480-07-405(8).

Please provide an original and two (2) copies of your responses to these data requests in accordance with WAC 480-07-405. Please direct all responses to these requests to Donald T. Trotter, Senior Counsel, P.O. Box 40128, 1400 S Evergreen Park Drive SW, Olympia, Washington, 98504-0128. Any questions concerning these Data Requests should be directed to Kathy Folsom at (360) 664-1279.

Very truly yours,


DONALD T. TROTTER
Senior Counsel

DTT:kl

cc: All Parties

General Rate Case:

Regarding Revenue Requirements and Testimony of Ms. Heuring:

WUTC STAFF DATA REQUEST NO. 414:

Please provide an explanation of how plant items get booked to Verizon NW's plant accounts for the two largest projects added during the test year in the following accounts: 2121, 2212, 2232, and 2423.1. Please also provide a list of all additions in those accounts by identifiable designation (name and work order) and dollar amount booked to the account.

WUTC STAFF DATA REQUEST NO. 415:

Regarding the Gross Addition Detail for accounts 2121, 2212, 2232, and 2423.1, please provide the documentation behind the Transfer to In Service for the following projects:

- a. Building construction in Mount Vernon;
- b. Building addition and HVAC expansion to Bothell North Co;
- c. RSU at Redmond Ridge and remote site;
- d. Replace switch system RSCS 1900;
- e. Marconi cue with three access maxes systems; and
- f. Place IOF cable F96 from Meadow Springs to Benton City boundary.

WUTC STAFF DATA REQUEST NO. 416:

Please provide a list of codes that show the intelligence built into the work order number.

WUTC STAFF DATA REQUEST NO. 417:

Please provide a vendor list that shows how the adjustment to Staff Data Request No. 328 was made. Please breakdown the list between direct and Verizon West allocated.

WUTC STAFF DATA REQUEST NO. 418:

Please provide an explanation and documentation for the year-end 2002 and year-end 2003 journal entries requested by Paula Strain during the on-site audit visit. . Please include dollar amounts associated with each expense-related journal entry made in December 2002 and 2003.