

ATTACHMENT 7

Staff Data Request No. 227 (June 9, 2004)



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

June 9, 2004

Sent Via 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. 277-280

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. However, it is possible the requests or responses may apply to the interim rate filing.

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.



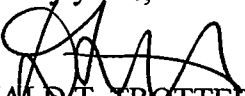
If you refuse to respond to any data request, or if you cannot respond fully to any data request, please provide as complete a response as you are capable, and state all reasons why a full response is not forthcoming. If you object to any data request, you must do so within the time limits prescribed 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 Paula Strain at (360) 664-1278.

Very truly yours,



DONALD T. TROTTER
Senior Counsel

DTT:kl

cc: All Parties
Judith A. Endejan
Richard E. Potter

General Rate Case

WUTC STAFF DATA REQUEST NO. 277:

With respect to the recently-announced sale of Verizon's wireline-related businesses in Hawaii to the Carlyle Group, please provide the following documents pertaining to the sale:

- a. Sales Agreement(s);
- b. Due Diligence investigation documents ;
- c. Prospectus (or similar document)
- d. Board of Director minutes;
- e. Any other agreements containing terms and conditions of sale;
- f. State and federal regulatory submittals including property transfer applications, SEC filings, DOJ or FCC submittals.

To the extent that formal agreements or documents have not yet been executed, please provide a description of the terms and conditions pertaining to the sale, and supply formal documents when available.

WUTC STAFF DATA REQUEST NO. 278:

Regarding the exhibit of Verizon witness Ms. Heuring: Exhibit No. ____ (NWH-2), page 1, column (b), please provide data in a similar format, for the test year, for the following:

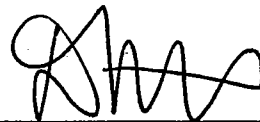
- a) Verizon Northwest Inc. - Total Company
- b) Verizon Northwest Inc. - Total Company Washington
- c) Verizon Northwest Inc. - Washington Subject to Separations
- d) Verizon Northwest Inc. - Washington Non-Regulated
- e) Verizon Northwest Inc. - Washington Regulated

WUTC STAFF DATA REQUEST NO. 279:

As a follow-up to your response to Data Request No. 213 (which asked how \$526 million in additions to gross plant since 2000 has increased intrastate rate base by \$40 million over the same period), please specify the basis of the \$526 million referred to in Mr. Banta's testimony at Exhibit No. ___ (SMB-1T) at page 5, lines 9-10, and whether it represents gross plant additions for Verizon Northwest Inc. total company, Verizon Northwest total Washington, Verizon Northwest total Washington – regulated, or some other jurisdictional subdivision.

WUTC STAFF DATA REQUEST NO. 280:

Please provide a list of all external and internal audits involving or affecting Verizon Northwest Inc. from January 2001 to the present. Please provide the subject of the audit, the entity being audited, the external entity or internal Verizon group performing the audit, the period being audited, and the date of the audit report.



DONALD T. TROTTER
Senior Counsel