

August 1, 2018

Mr. Mark L. Johnson  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
P.O. Box 47250  
Olympia, Washington 98504-7250

**Re: Rulemaking to Make Corrections and Changes in Rules in WAC 480-07, Relating to Procedural Rules, Docket A-130355**

Dear Mr. Johnson:

This response is provided on behalf of the following CenturyLink telecommunications companies in Washington (individually and collectively, "CenturyLink") in response to the Commission's Notice of Opportunity to Submit Written Comments dated July 2, 2018 regarding proposed amendments to the Washington Administrative Code ("WAC") Chapter 480-07, Parts III B through IV:

Qwest Corporation d/b/a CenturyLink QC;

United Telephone Company of the Northwest d/b/a CenturyLink;

CenturyTel of Washington, Inc. d/b/a CenturyLink;

CenturyTel of Inter Island, Inc. d/b/a CenturyLink; and

CenturyTel of Cowiche, Inc. d/b/a CenturyLink.

While CenturyLink no longer files rate cases, it supports the general rate case comments submitted by other utilities in this proceeding, particularly Puget Sound Energy ("PSE"). In addition, CenturyLink renews concerns previously stated by it and other utilities in this proceeding and provides the following comments:

**WAC 480-07-740(2)(a) Settlement consideration procedure, specific timing requirements.**

CenturyLink recommends that the Commission take this opportunity to clarify what it means by "matters of comparable complexity", with regard to submission of a settlement agreement in "Complex proceedings". CenturyLink also recommends that the Commission reject the proposed amendment to double the amount of time from 30 to 60 days for submitting a settlement agreement for review.

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**WAC 480-07-740(2)(b)**

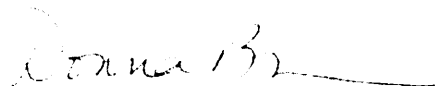
Similarly, CenturyLink recommends that the Commission distinguish “complex proceedings” from “less complex matters”. For less complex matters, CenturyLink recommends that the Commission reject the proposed amendment requiring submission 30 days prior to the requested effective date in favor of the current 21 days.

**WAC 480-07-750(2)(b)(ii) Approval or rejection of a settlement.**

CenturyLink supports PSE’s prior comment regarding rejecting conditions placed on a settlement agreement. CenturyLink agrees that requiring a settling party to unequivocally and unconditionally accept all conditions is unnecessary and opens the parties to a drastic unintended consequence if an acceptance is not deemed sufficiently unequivocal. If the Commission adopts the proposed amendment, CenturyLink supports Staff’s recommendation to provide prior notice before rejecting a settlement, but CenturyLink believes the default should be the parties’ acceptance of conditions unless they expressly reject them.

CenturyLink appreciates the opportunity to provide these comments for the Commission’s consideration.

Sincerely,



Donna L. Barnett