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RE THE ARIZONA CORPORATION COMMISSION

Arizona Corporation Commission
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CHAIRMAN
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COMMISSIONER
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COMMISSIONER

Docket No. T-01051B-99-0105

**RUCO'S RESPONSE TO MOTION
TO SEVER, OR IN THE
ALTERNATIVE, TO BIFURCATE
HEARINGS**

5
6 IN THE MATTER OF THE APPLICATION
7 OF U S WEST COMMUNICATIONS, INC.,
8 A COLORADO CORPORATION, FOR A
9 HEARING TO DETERMINE THE
10 EARNINGS OF THE COMPANY, THE
11 FAIR VALUE OF THE COMPANY FOR
12 RATEMAKING PURPOSES, TO FIX A
13 JUST AND REASONABLE RATE OF
14 RETURN THEREON AND TO APPROVE
15 RATE SCHEDULES DESIGNED TO
16 DEVELOP SUCH RETURN.

13 The Residential Utility Consumer Office ("RUCO") opposes the motion of
14 MCIWorldcom, Inc., AT&T Communications of the Mountain States, Inc., and Sprint
15 Communications Company L.P. (collectively "CLECs") to sever U S West's request for the
16 deregulation of data services and the creation of competitive zones from the instant
17 proceedings.

18 In this docket, U S West seeks a determination of its revenue requirement and rate
19 design, to be based on fair value rate base. Any deregulation of services and creation of
20 competitive zones will necessarily impact the revenue requirement determination, just as any
21 calculation of revenue requirement will determine the extent of competitive services and zones.
22 It would be inappropriate to sever the competitive issues from the rate case, as the two are
23 inextricably linked.
24

1 For the foregoing reason, RUCO opposes the CLECs' motion, and urges denial by the
2 Arizona Corporation Commission.

3 RESPECTFULLY SUBMITTED this 24th day of February, 2000.

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6 
7 Jessica Carpenter
8 Attorney, RUCO

9 AN ORIGINAL AND TEN COPIES
10 of the foregoing filed this 24th day of
11 February, 2000 with:

12 Docket Control
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