



0000012023

RECEIVED
AZ CORP COMMISSION

BEFORE THE ARIZONA CORPORATION COMMISSION

Arizona Corporation Commission

JUN 15 4 20 PM '00

DOCKETED

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

CARL J. KUNASEK
Chairman
JAMES M. IRVIN
Commissioner
WILLIAM MUNDELL
Commissioner

DOCUMENT CONTROL

JUN 15 2000

DOCKETED BY [Signature]

IN THE MATTER OF THE APPLICATION
OF U S WEST COMMUNICATIONS, INC.,
A COLORADO CORPORATION, FOR A
HEARING TO DETERMINE THE EARNINGS
OF THE COMPANY, THE FAIR VALUE OF
THE COMPANY FOR RATEMAKING
PURPOSES, TO FIX A JUST AND
REASONABLE RATE OF RETURN THEREON
AND TO APPROVE RATE SCHEDULES
DESIGNED TO DEVELOP SUCH RETURN.

DOCKET NO. T-01051B-99-0105

**U S WEST COMMUNICATIONS,
INC.'S RESPONSE TO
COMMISSION STAFF'S MOTION TO
COMPEL**

U S WEST Communications, Inc. ("U S WEST") submits the following response to Staff's Motion to Compel U S WEST Communications, Inc. to Respond to Commission Staff Data Requests.

In Data Request No. 43-20, Commission Staff has asked U S WEST Communications, Inc. to prepare an update to an alternative proposal that U S WEST included in its original January 1999 filing. Data Request No. 43-20 is in substance a request for a second updated rate case filing (excluding RCND, cost studies and rate design). U S WEST does not object to this Data Request and is in the process of preparing a response. U S WEST anticipates that its response will be complete by June 27, 2000.

In its motion to compel, Staff contends that U S WEST's alternative proposal was required by A.C.C. R14-2-103(B). In

1 fact, A.C.C. R14-2-103(B) does not require the "adjustments not
2 made" filing that Staff is now requesting. As a result, U S WEST
3 regarded Data Request 43-20 to have the same priority as any
4 other data request. Since May 3, 2000, when U S WEST made its
5 updated filing, various parties have served U S WEST with data
6 requests which together number several hundred and will soon
7 exceed one thousand. U S WEST has received a set of data
8 requests almost every day. With a five day turnaround, U S WEST
9 has had to prioritize its efforts when responding to data
10 requests. U S WEST has requested that Staff and RUCO notify U S
11 WEST when individual data requests are particularly important so
12 that U S WEST's prioritization reflects Staff and RUCO needs. On
13 June 2, 2000, Commission Staff first notified counsel for
14 U S WEST that Staff's experts needed a response to Data Request
15 No. 43-20. At that time, U S WEST offered to prepare the
16 "adjustments not made" in the order in which Staff wanted to
17 review them. U S WEST also offered to prepare an entire
18 "adjustments not made" filing but that it would take time to
19 complete this work. Staff responded by filing its motion to
20 compel on June 6, 2000. Upon receipt of the motion, U S WEST
21 further increased its efforts to respond to this data request.
22 As stated above, a response will be completed by June 27, 2000.

23 ///

24 ///

25 ///

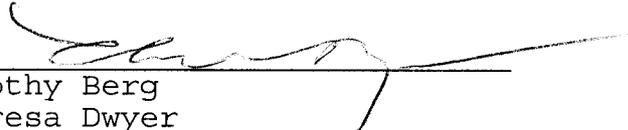
26 ///

1 DATED this 15th day of June, 2000.

2 U S WEST COMMUNICATIONS, INC.
3 Law Department
4 Thomas Dethlefs

5 and

6 FENNEMORE CRAIG

7 By 
8 Timothy Berg
9 Theresa Dwyer
10 3003 N. Central Avenue, Suite
11 2600
12 Phoenix, Arizona 85012-2913
13 Attorneys for U S West
14 Communications, Inc.

15 ORIGINAL AND TEN of the foregoing hand-delivered
16 for filing this 15th day of
17 June, 2000, to:

18 Docket Control
19 ARIZONA CORPORATION COMMISSION
20 1200 West Washington
21 Phoenix, Arizona 85007

22 COPY of the foregoing hand-delivered
23 this 15th day of June, 2000, to:

24 Maureen Scott
25 ARIZONA CORPORATION COMMISSION
26 Legal Division
1200 West Washington
Phoenix, Arizona 85007

Deborah Scott
Director, Utilities Division
ARIZONA CORPORATION COMMISSION
1200 West Washington
Phoenix, Arizona 85007

Jerry L. Rudibaugh, Chief Hearing Officer
Hearing Division
Arizona Corporation Commission
1200 W. Washington
Phoenix, AZ 85007

- 1 COPY of the foregoing mailed
- 2 this 15th day of June, 2000, to:

- 3 Scott S. Wakefield, Chief Counsel
- 4 Residential Utility Consumer Office
- 5 2828 N. Central Ave., Suite 1200
- 6 Phoenix, AZ 85004-1022

- 7 Darren S. Weingard
- 8 Natalie D. Wales
- 9 Sprint Communications Company, L.P.
- 10 1850 Gateway Drive, 7th floor
- 11 San Mateo, CA 94404-2467

- 12 Steven J. Duffy
- 13 Ridge & Isaacson, P.C.
- 14 3101 N. Central Ave., Suite 432
- 15 Phoenix, AZ 85012

- 16 Raymond S. Heyman
- 17 Randall H. Warner
- 18 Roshka Heyman & DeWulf
- 19 Two Arizona Center
- 20 400 N. Fifth St., Suite 1000
- 21 Phoenix, AZ 85004

- 22 Peter Q. Nyce, Jr.
- 23 General Attorney, Regulatory Law Office
- 24 U.S. Army Legal Services Agency
- 25 Department of the Army
- 26 901 N. Stuart St., Suite 700
- 27 Arlington, VA 22203-1837

- 28 Richard Lee
- 29 Snavelly, King, Majoros, O'Connor & Lee, Inc.
- 30 1220 L St., N.W., Suite 410
- 31 Washington, D.C. 20005

- 32 Thomas F. Dixon
- 33 MCI WorldCom
- 34 707 17th St., Suite 3900
- 35 Denver, CO 80202
- 36 Thomas H. Campbell
- 37 Lewis & Roca

- 1 40 N. Central Ave.
Phoenix, AZ 85004
- 2
- 3 Richard S. Wolters
AT&T
- 4 1875 Lawrence St., Suite 1575
Denver, CO 80202
- 5
- 6 Mary B. Tribby
AT&T
- 7 1857 Lawrence St., Ste. 1575
Denver, CO 80202
- 8
- 9 Patricia VanMidde
AT&T
- 10 2800 N. Central, Room 828
Phoenix, AZ 85004
- 11 Diane Bacon, Legislative Director
Communications Workers of America
- 12 Arizona State Council
5818 N. 7th St., Suite 206
Phoenix, AZ 85014-5811
- 13
- 14 Thomas H. Campbell
LEWIS AND ROCA
- 15 40 N. Central Avenue
Phoenix, Arizona 85004
- 16
- 17 Michael W. Patten
BROWN & BAIN, P.A.
- 18 2901 North Central Avenue, Suite 2000
Phoenix, Arizona 85001-0400
- 19
- 20 Craig Marks
Citizens Utilities Company
- 21 2901 N. Central Ave., Suite 1660
Phoenix, AZ 85012
- 22
- 23 Jeffrey Crockett
Snell & Wilmer
- 24 One Arizona Center
Phoenix, AZ 85004-0001
- 25
- 26

1 J.E. McGillivray
300 S. McCormick
2 Prescott, AZ 86303

3 Jon Poston
4 Arizonians for Competition in Telephone Service
6733 East Dale Lane
5 Cave Creek, AZ 85331

6 Albert Sterman
7 Vice President
8 Arizona Consumers Council
2849 E. 8th Street
Tucson, AZ 85716

9 Douglas Hsiao
10 Frank Paganelli
Rhythms Links, Inc.
11 6933 Revere Parkway
12 Englewood, CO 80112

13 Jim Scheltema
Blumenfeld & Cohen
14 1625 Massachusetts Ave., NW, Suite 300
Washington, SC 20036

15
16 Martin A. Aronson
William D. Cleaveland
17 Morrill & Aronson, PLC
One East Camelback, Suite 340
18 Phoenix, AZ 85012-1658

19 Joan S. Burke
Osborn Maledon, P.A.
20 2929 N. Central Ave., Suite 2100
21 Phoenix, AZ 85012

22

23

24

25

26