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ARIZONA CORPORATION COMMISSION

Arizona Corporation Commission

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Chairman
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Commissioner
WILLIAM A. MUNDELL
Commissioner

DOCKETED
[Handwritten initials]

IN THE MATTER OF THE APPLICATION OF)
U S WEST COMMUNICATIONS, INC. FOR A)
HEARING TO DETERMINE THE EARNINGS)
OF THE COMPANY FOR RATEMAKING) DOCKET NO. T-01051B-99-0105
PURPOSES, TO FIX A JUST AND)
REASONABLE RATE OF RETURN THEREON)
AND TO APPROVE RATE SCHEDULES)

AT&T'S RESPONSE TO STAFF AND RUCO'S
MOTION FOR EXTENSION OF TIME

AT&T Communications of the Mountain States, Inc. ("AT&T") supports the Staff of the Arizona Corporation Commission ("Staff") and the Residential Utility Consumer Office ("RUCO") joint motion for extension of time and, for essentially the same reasons expressed by Staff and RUCO, AT&T requests an extension until August 10, 2000, to file its direct testimony.

On June 16, 2000, a hearing was held on AT&T's Motion to Compel U S WEST Communications, Inc. ("U S WEST") to respond to AT&T Request No. 71. At the hearing, U S WEST agreed to provide by June 30, 2000, a breakdown of the 176 plant additions provided in request 71, by regulated and non-regulated investments. AT&T received U S WEST's response on July 11, 2000.

AT&T agreed to identify for U S WEST by June 30, 2000, the additional information it would need to satisfy AT&T's request. AT&T provided a letter to U S WEST

on June 23, 2000, describing the additional information AT&T would like to review in response to AT&T Request No. 71. (See Exhibit A.) On July 13, 2000, to expedite AT&T's request for further review, AT&T sent an e-mail to U S WEST along with a list of the plant additions for which AT&T wished to review further documentation.

AT&T has made a number of telephone calls to U S WEST to inquire about the response to AT&T Request No. 71 and the information requested by AT&T in the letter dated June 23, 2000. AT&T has received no response from U S WEST on when the documentation would be available for review.

Testimony is due July 25, 2000. There is no way AT&T can obtain and review the information requested by AT&T and incorporate the analysis resulting from any review in the testimony due July 25, 2000.

AT&T respectfully requests an extension of the filing of direct testimony from July 25 to August 10, 2000.

DATED this 19th day of July, 2000.

AT&T COMMUNICATIONS OF THE
MOUNTAIN STATES, INC.

By:


Mary B. Tribby
Richard S. Wolters
AT&T Law Department
1875 Lawrence Street, Suite 1500
Denver, Colorado 80202
Telephone: (303) 298-6741
Facsimile: (303) 298-6301

CERTIFICATE OF SERVICE

I hereby certify that the original and 10 copies of AT&T's Response to Staff and RUCO's Motion for Extension of Time regarding Docket No. T-01051B-99-0105, were hand delivered this 19th day of July, 2000, to:

Arizona Corporation Commission
Docket Control - Utilities Division
1200 West Washington Street
Phoenix, AZ 85007

and a true and correct copy was hand delivered this 19th day of July, 2000, to:

Carl J. Kunasek, Chairman
Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007

Jerry Porter
Arizona Corporation Commission
1200 West Washington Street
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James M. Irvin, Commissioner
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and a true and correct copy was sent via Facsimile and United States Mail, postage prepaid, this 19th day of July, 2000, to:

Timothy Berg
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Fennemore Craig, P.C.
3003 North Central, Suite 2600
Phoenix, AZ 85012
FAX: (602) 916-5621

and a true and correct copy was sent via United States Mail, postage prepaid, this 19th day of July, 2000, to:

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Carla Dickinson (TH)



Richard S. Wolters
Senior Attorney

Room 1575, 15th Floor
1875 Lawrence Street
Denver, CO 80202
303 298-6741

June 23, 2000

Mr. Tom Dethlefs
U S WEST, Inc.
1801 California Street
Suite 5100
Denver, CO 80202

Re: **U S WEST Arizona Rate Proceeding
Docket No. T-1051B-99-105**

Dear Tom:

I discussed the information that AT&T has requested in AT&T Data Request No. 71 with my subject matter expert to ascertain the information AT&T wishes to review. U S WEST's offer to break down the 176 plant additions by regulated and non-regulated investment by use of project codes is an acceptable start. In lieu of requiring U S WEST to provide individually "all invoices, work or job orders and engineering plant records," AT&T is willing, at this time, to limit review to Specific Estimates projects. AT&T requests on-site review of documents from the Specific Estimates file or folder for each regulated investment that indicate why the project was undertaken and why the money was spent and that show the coding of the project (which identifies the project as regulated or non-regulated).

It is AT&T's understanding that construction projects fall under one of two categories: Specific Estimates or Routine Estimates. Reports provided by U S WEST in response to data requests appear to bear this out. It is also AT&T's understanding that documents representing a Specific Estimates project are maintained in a file or folder in the engineering office. Finally, it is AT&T's understanding that Specific Estimate files are generally located in Denver.

Therefore, initially, U S WEST would separate the 176 plant additions into two categories: regulated and non-regulated. U S WEST would subsequently break down the regulated projects into two sub-categories: Routine Estimates and Specific Estimates. AT&T would be provided the opportunity to conduct an on-site review of each file or folder maintained on the regulated Specific Estimates projects. Finally, AT&T would

EXHIBIT A

reserve the right to review the files for Routine Estimates projects that appear to be monetarily substantial. After review of U S WEST's response to AT&T Request No. 72, AT&T will select specific plant additions for which it will request the same documents.

Please let me know if this is acceptable to U S WEST.

Sincerely,

AT&T COMMUNICATIONS OF THE
MOUNTAIN STATE, INC.

A handwritten signature in cursive script, appearing to read "Richard S. Wolters", with a long horizontal flourish extending to the right.

Richard S. Wolters

cc: Service List

CERTIFICATE OF SERVICE

I hereby certify that the original of the Letter dated June 23, 2000 from Richard S. Wolters of AT&T to Thomas Dethlefs of U S WEST Communications, Inc., regarding Docket No. T-01051B-99-0105, was sent via overnight delivery this 23rd day of June, 2000, to:

Thomas Dethlefs
U S WEST Communications, Inc.
1801 California Street, Suite 5100
Denver, CO 80202

and a true and correct copy was sent via United States Mail, postage prepaid, this 23rd day of June, 2000, to:

Carl J. Kunasek, Chairman
Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007

Jerry Porter
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