

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**

3 **UW 1908, UM 2206**

4 In the Matter of:

5 LUMEN TECHNOLOGIES,

6 Proposed Commission action Pursuant to ORS
7 756.515 to Suspend and Investigate Price Plan
(UM 1908), and

8 QWESST CORPORATION,

9 Investigation Regarding the Provision of
10 Service in Jacksonville, Oregon and
Surrounding Areas (UM 2206)

MOTION TO ADMIT STIPULATION,
PRE-FILED TESTIMONY, AND EXHIBITS

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14 Pursuant to OAR 860-001-0350(7), Staff of the Public Utility Commission of Oregon
15 (Staff) and Qwest Corporation, United Telephone Company of the Northwest, CenturyTel of
16 Oregon, and CenturyTel of Eastern Oregon (collectively "CenturyLink" or "Company"),
17 (collectively the "Stipulating Parties") move for admission of the Stipulation, pre-filed
18 testimony, and exhibits into the record of the above-captioned docket. The Stipulating Parties
19 request the Administrative Law Judge (ALJ) admit the following pre-filed exhibits into the
20 record in the above-captioned case.

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| 22 Stipulating Parties Exhibit No. | Description |
|---|--|
| 23 100 | Joint Testimony of Russ Beitzel and Peter Gose |
| 24 101 | Witness Qualification Statement |
| 25 102 | Order No. 04-064 and MOU |
| 26 103 | Map of Jacksonville RDOF Build |

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| Staff Exhibit No. | Description |
|--------------------------|---------------------------------|
| 200 | Reply Testimony of Russ Beitzel |

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| CenturyLink Exhibit No. | Description |
|--------------------------------|-------------------------------|
| 200 | Reply Testimony of Peter Gose |

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7 This motion is supported by the declarations of Stipulating Party witnesses Russ Beitzel

8 and Peter Gose who attest to the truthfulness of their testimony. These declarations are attached

9 to this motion. The Stipulating Parties respectfully request the Commission adopt the Stipulation

10 in its entirety.

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12 DATED this 21st day of November 2023.

13 Respectfully submitted,

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15 ELLEN F. ROSENBLUM
Attorney General

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17 */s/ Natascha B. Smith*

18 _____
Natascha B. Smith, #174661
Assistant Attorney General
Of Attorneys for Staff of the Public Utility
Commission of Oregon

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20 PERKINS COIE LLP

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22 By: /s/ Lawrence H. Reichman
Lawrence H. Reichman, OSB No. 860836
LReichman@perkinscoie.com
1120 N.W. Couch Street, Tenth Floor
Portland, OR 97209-4128
Telephone: 503.727.2000
Facsimile: 503.727.2222

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26 Attorneys for Lumen Technologies, Inc.

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**

3 **UM 1908**

4 In the Matter of

5 LUMEN TECHNOLOGIES,

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(UM 1908), and

8 QWEST CORPORATION,

9 Investigation Regarding the Provision of
10 Service in Jacksonville, Oregon and
Surrounding Areas (UM 2206),

11 Hearing Relating to Order Nos. 22-340 and
22-422.

DECLARATION OF
RUSS BEITZEL

12
13 I, Russ Beitzel, declare under penalty of perjury under the laws of the State of Oregon:

- 14 1. My name is Russ Beitzel. I am a Senior Utility Analyst employed in the Rates and
15 Telecommunications Section of the Rates, Safety and Utility Performance Program
16 Division of the Public Utility Commission of Oregon.
- 17 2. On behalf of Joint Parties, I jointly drafted testimony and exhibits in support of the
18 stipulation for use in this docket, as follows: Joint Testimony in Support of the
19 Stipulation (Exhibit Stipulating Parties/100), Witness Qualification Statement (Exhibit
20 Stipulating Parties/101), Order No. 04-464 and MOU (Exhibit Stipulating Parties/103). I
21 individually drafted exhibits as follows: Staff Reply Testimony (Exhibit Staff/200).
- 22 3. To the best of my knowledge, my testimony and my witness qualification statement are
23 true and accurate.

24 I hereby declare that the above statements are true to the best of my knowledge and belief,
25 and I understand it is made for use as evidence before the Public Utility Commission of
26 Oregon and is subject to penalty for perjury.

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SIGNED this 16 day of November 2023.

Signed: Russell E Beitzel III
Russ Beitzel

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2 **OF OREGON**

3 **UM 1908**

4 In the Matter of

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6 Proposed Commission action Pursuant to ORS
7 756.515 to Suspend and Investigate Price Plan
(UM 1908), and

8 QWEST CORPORATION,

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10 Service in Jacksonville, Oregon and
Surrounding Areas (UM 2206),

11 Hearing Relating to Order Nos. 22-340 and
22-422.

DECLARATION OF
PETER GOSE

12
13 I, Peter Gose, declare under penalty of perjury under the laws of the State of Oregon:

- 14 1. My name is Peter Gose. I am the Director of State and Local Government Affairs for
15 CenturyLink.
- 16 2. On behalf of Joint Parties, I jointly drafted testimony and exhibits in support of the
17 stipulation for use in this docket, as follows: Joint Testimony in Support of the
18 Stipulation (Exhibit Stipulating Parties/100), Witness Qualification Statement (Exhibit
19 Stipulating Parties/101), Order No. 04-464 and MOU (Exhibit Stipulating Parties/102),
20 and Map of Jacksonville RDOF Build (Exhibit Stipulating Parties/103). I individually
21 drafted exhibits as follows: CenturyLink’s Reply Testimony (Exhibit CenturyLink/200).
- 22 3. To the best of my knowledge, my testimony and my witness qualification statement are
23 true and accurate, subject to the corrections I made on the record at the November 15,
24 2023 evidentiary hearing.
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1 I hereby declare that the above statements are true to the best of my knowledge and belief,
2 and I understand it is made for use as evidence before the Public Utility Commission of
3 Oregon and is subject to penalty for perjury.

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5 SIGNED this 21st day of November 2023.

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Signed: /s/ Peter Gose
Peter Gose

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