



DEPARTMENT OF JUSTICE
GENERAL COUNSEL DIVISION

December 28, 2022

via E-mail

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street SE, Suite 100
Salem, OR 97308-1088
PUC.FilingCenter@puc.oregon.gov

Re: UM 1908– Staff’s Six-Step Plan for Plant Restoration

At the December 21, 2022, hearing ALJ Moser requested that Staff provide a copy of Staff’s six-step plant restoration plan or otherwise cite to the plan in pre-submitted testimony and evidence. Staff submits the following information about the inclusion of Staff’s six-step plan for bringing Lumen’s cable plant to “like new” conditions. Relevant documents discussing the plan and Lumen’s response include the Testimony of Joseph Bartholomew (Staff/100, Bartholomew/10), the February 14, 2022 public meeting memo explaining Lumen’s reasoning for rejecting Staff’s plan (Staff/104, Bartholomew/7), and the email containing Staff’s six-step plan sent to Lumen on December 13, 2021 (Staff/105, Bartholomew/111).

Sincerely,

/s/ Natascha Smith

Natascha Smith
Assistant Attorney General
Business Activities Section

NB7:pjr/#9970779