

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

3 **UW 1908**

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),

11 Hearing Relating to Order Nos. 22-340 and 22-
12 422.

MOTION TO ADMIT PRE-FILED
TESTIMONY AND EXHIBITS

13
14 Staff of the Public Utility Commission of Oregon (Staff) moves for admission of the
15 following pre-filed testimony and exhibits into the record of the above-captioned docket.

Staff Exhibit No.	Description
100	Testimony of Joseph Bartholomew
101	Witness Qualification statement
102	Map
103	Lumen Confidential Responses to Staff Information Requests
104	Public Meeting Materials
105	Documents Supporting Staff Investigation
200	Testimony of Melissa Nottingham Amended
201	Witness Qualification Statement
202	Consumer Services Complaint Record
203	Public Comment Summary

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3 This motion is supported by the declarations of Staff witnesses Joseph Bartholomew and
4 Melissa Nottingham who attest to the truthfulness of their testimony. The declarations are
5 attached to this motion.
6

7 DATED this 22nd day of December 2022.

8 Respectfully submitted,

9
10 ELLEN F. ROSENBLUM
Attorney General

11 */s/ Natascha B. Smith*

12 _____
13 Natascha B. Smith, #174661
14 Assistant Attorney General
Of Attorneys for Staff of the Public Utility
15 Commission of Oregon
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11 Hearing Relating to Order Nos. 22-340 and
12 22-422.

DECLARATION OF
Joseph Bartholomew

13 I, Joseph Bartholomew, declare under penalty of perjury under the laws of the State of
14 Oregon:

- 15 1. My name is Joseph Bartholomew. I am a Senior Utility Analyst in the Rates, and
16 Finance, and Audit Division of the Public Utility Commission of Oregon.
- 17 2. On behalf of Staff, I drafted testimony and exhibits in support of the stipulation for use in
18 this docket, as follows: Staff/100 (Staff Testimony), Staff/101 (Witness Qualification
19 Statement), Staff /102 (Map), Staff/103 (Lumen Confidential Responses to Staff
20 Information Requests), Staff/104 (Public Meeting Materials), and Staff/105 (Documents
21 Supporting Staff Investigation).
- 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 22nd day of December 2022.

Signed: /s/ Joseph Bartholomew
Joseph Bartholomew

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

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

11 Hearing Relating to Order Nos. 22-340 and
12 22-422.

DECLARATION OF
Melissa Nottingham

13 I, Melissa Nottingham, declare under penalty of perjury under the laws of the State of
14 Oregon:

- 15 1. My name is Melissa Nottingham. I am the Consumer Services and Residential Service
16 Protection Fund Manager for the Public Utility Commission of Oregon.
- 17 2. On behalf of Staff, I drafted testimony and exhibits in support of the stipulation for use in
18 this docket, as follows: Staff/200 (Staff Amended Testimony), Staff/201 (Witness
19 Qualification Statement), Staff /202 (Consumer Services Complaint Record), and
20 Staff/203 (Public Comment Summary).
- 21 3. To the best of my knowledge, my testimony and my witness qualification statement are
22 true and accurate.

23 I hereby declare that the above statements are true to the best of my knowledge and belief,
24 and I understand it is made for use as evidence before the Public Utility Commission of
25 Oregon and is subject to penalty for perjury.
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SIGNED this 22nd day of December 2022.

Signed: /s/ *Melissa Nottingham*
Melissa Nottingham