

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

3 **UM 1908 / UM 2206**

4 In the Matter of
5 LUMEN TECHNOLOGIES,
6 Proposed Commission action Pursuant to
7 ORS 756.515 to Suspend and Investigate
8 Price Plan (UM 1908), and
9 QWEST CORPORATION,
10 Investigation Regarding the Provision of
11 Service in Jacksonville, Oregon and
12 Surrounding Areas (UM 2206)

**CENTURYLINK’S MOTION TO
EXTEND 2018 PRICE PLAN**
Expedited Consideration Requested

12 CenturyLink respectfully moves the Commission for an order extending the effective
13 date of its existing price plan, approved in Order No. 18-359 (the “2018 Price Plan”), through
14 May 15, 2024, and providing that the price plan the Commission approved in Order No. 24-041
15 (the “2024 Price Plan”) will be effective immediately upon expiration of the 2018 Price Plan.
16 CenturyLink requests expedited consideration of this motion because the 2018 Price Plan is
17 effective only through February 29, 2024. CenturyLink is authorized to represent that this motion
18 is supported by Commission Staff, Oregon Citizens’ Utility Board, and Intervenor Priscilla
19 Weaver.

20 In Order No. 23-345, the Commission extended the effective date of the 2018 Price Plan
21 through February 29, 2024. In Order No. 24-041, issued February 9, 2024, the Commission
22 approved a Stipulation between CenturyLink and Staff that included the 2024 Price Plan, subject
23 to certain modifications. CenturyLink and Staff filed a revised price plan and other documents on
24 February 23, 2024, in compliance with Order No. 24-041.

25 Immediately after receipt of Order No. 24-041, CenturyLink commenced efforts to
26 implement changes to its IT systems to develop the functionality to route calls from

1 approximately 4,100 Protected Customer phone numbers to a dedicated customer service line,
2 rather than only calls from Jacksonville area customers screened by ZIP Code. Identifying calls
3 from Protected Customers by phone number rather than a single ZIP Code requires creating a
4 centralized database of the 4,100+ subscribers, as well as tools to add or remove Protected
5 Customers from that database as necessary from time to time. The ability to keep the database
6 current and launch data queries into that database from various systems used by customer care,
7 dispatch centers, and field operations, requires substantial IT coordination and programming,
8 with a sizeable cost. Not knowing whether the Commission would approve or amend the
9 Stipulation and price plan, CenturyLink could not commence this development work earlier.
10 CenturyLink understands that it will take approximately 30 to 60 days to develop and implement
11 the database and these call-routing changes.

12 CenturyLink will also require time to notify all residential subscribers in Oregon of the
13 availability of Protected Customer status and provide means by which CenturyLink residential
14 local service customers in Oregon may contact the Company to inquire about enrollment as a
15 Protected Customer. In addition, CenturyLink will need to file revised tariff pages to implement
16 other sections of the 2024 Price Plan.

17 As requested by Ms. Weaver, CenturyLink confirms that the Jacksonville Orders (as
18 defined in Order No. 24-041) will remain in effect and will not subject to suspension until the
19 2024 Price Plan takes effect.

20 For all of these reasons, CenturyLink requests that the Commission extend the effective
21 date of the 2018 Price Plan through May 15, 2024, and confirm that the 2024 Price Plan will be
22 effective immediately upon termination of the 2018 Price Plan. If CenturyLink is able to
23 complete the IT coordination and programming work necessary to implement the dedicated
24 customer service line for all Protected Customers before May 15, 2024, it will inform the
25 Commission and may request that the 2024 Price Plan become effective earlier than that date.

26

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

DATED: February 29, 2024

PERKINS COIE LLP

By: /s/ Lawrence Reichman

Lawrence Reichman, OSB No. 860836
LReichman@perkinscoie.com
1120 N.W. Couch Street, 10th Floor
Portland, OR 97209-4128
Telephone: 503.727.2000
Facsimile: 503.727.2222

Representing CenturyLink