

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

3 UM 1150

4 In the Matter of

5 BEAVER CREEK COOPERATIVE  
6 TELEPHONE COMPANY

7 Petition to Abandon Billing and Collection  
8 Services.

STAFF'S RESPONSE TO QWEST'S MOTION  
TO CONSOLIDATE

8 On May 14, 2004, Qwest Corporation ("Qwest") filed a Motion to Consolidate this  
9 proceeding with its simultaneously filed Petition for a Waiver of its Intralata Designated Toll  
10 Carrier Obligations ("Petition for Waiver") and for a brief extension of the applicable dates of  
11 this proceeding. On May 21, 2004, a prehearing conference was held and ALJ Grant  
12 established a briefing schedule on Qwest's Motion to Consolidate. The briefing schedule  
13 provides that responses to Qwest's Motion to Consolidate are due May 27, 2004, and that replies  
14 to those responses are due June 3, 2004. The Public Utility Commission of Oregon Staff  
15 ("Staff") files this response to Qwest's Motion.

16 Staff does not oppose Qwest's Motion to Consolidate its Petition for Waiver with Docket  
17 UM 1150. After reviewing the responses of other parties, Staff reserves the right to file a reply  
18 to those responses.

19 In UM 1150, Beaver Creek Cooperative Telephone Company ("Beaver Creek") has filed  
20 a petition to abandon billing and collection services. At this stage of review, Staff does not know  
21 whether Beaver Creek's Petition should be granted, denied, or granted with conditions.  
22 However, Beaver Creek's Petition does seemingly affect Qwest. In fact, Qwest's Petition for  
23 Waiver is presumably only because of Beaver Creek's Petition.

24 As a result of the relationship between the issues, Staff does not oppose Qwest's Motion  
25 to Consolidate. Staff notes, however, that there are also other alternatives. For example, in lieu  
26 of consolidation, schedules in each docket could be established according to the other related

1 docket and timing of Commission decisions. In addition, an order in UM 1150 could be  
2 conditioned upon giving Qwest an opportunity to petition the Commission for waiver and, if  
3 granted, time to notify customers so as to avoid unnecessary customer confusion.

4 **CONCLUSION**

5 Staff does not oppose Qwest's Motion to Consolidate these proceedings. Although Staff  
6 does not oppose consolidation, it notes that there are also other potential alternatives available.

7 DATED this \_\_\_\_ day of May 2004.

8 Respectfully submitted,

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10 HARDY MYERS  
Attorney General

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12 \_\_\_\_\_  
13 Jason W. Jones, #00059  
14 Assistant Attorney General  
Of Attorneys for the Public Utility Commission  
of Oregon