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4	BEFORE THE PUBLIC UTILITY COMMISSION			
5	OF THE STATE OF OREGON			
6	UM 1087			
7 8	CENTRAL LINCOLN PEOPLE'S UTILITY DISTRICT,			
9	Complainant,	Central Lincoln People's Utility District's Response to Administrative Law Judge's First Data Request		
10	v.			
11	VERIZON NORTHWEST INC.,			
12	Defendant.			
13	Complainant, Central Lincoln People's Utility District ("CLPUD"), responds to the			
14	Administrative Law Judge's Data Request dated November 23, 2004 as follows:			
15	1. As far as may be ascertained from CLPUD's records, the route patrols that			
16	produced the information in Verizon Exhibit 128 were conducted from January 8, 2001 through			
17				
18	2. As far as may be ascertained from CLPUD's records, the route patrols that			
19	produced the information in Verizon Exhibit 129 were conducted from February 14, 2001			
20	-			
21	3. Documents to substantiate these dates are enclosed.			
22				
23				
24				
25		Charles M. Simmons, OSB No. 02455 Of Attorneys for Complainant		
26		Central Lincoln People's Utility District		
	Page 1 – CLPUD'S RESPONSE TO DATA REQUESTS			

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CERTIFICATE OF SERVICE

I hereby certify that I served a complete and true copy of the foregoing Response to
Administrative Law Judge's First Data Request on the following persons:

4	Timothy J. O'Connell	V. Denise Saunders
	Stoel Rives LLP	Attorney at Law
5	600 University Street	Portland General Electric Co.
	Suite 3600	121 SW Salmon Street 1WTC1301
6	Seattle, Washington 98101	Portland, Oregon 97204
	tjoconnell@stoel.com	denise_sanders@pgn.com
7	-	
	Renee Willer	Stephanie Andrus
8	Verizon Northwest, Inc.	Oregon Department of Justice
0	P.O. Box 1100	1162 Court Street NE
9	Beaverton, Oregon 97075	Salem, OR 97301-4096
/	rene.willer@verizon.com	stephanie.andrus@state.or.us
10		1
10	Patrick G. Hager	Paul Davies
11	Portland General Electric Co.	Central Lincoln PUD
11	121 SW Salmon Street 1WTC0702	P.O. Box 1126
12	Portland, Oregon 97204	Newport, OR 97365
12	patrick.hager@pgn.com	pdavies@cencoast.com
13	F	F
15	Brooks Harlow	Hong Huynh
14	Miller Nash LLP	Miller Nash LLP
14	601 Union Street Suite 4400	3500 US Bancorp Tower
15	Seattle, Washington 98101	111 SW Fifth Avenue
15	brooks.Harlow@millernash.com	Portland, Oregon 97204
16		hong.huynh@millernash.com
16		nong.nuyin e ninemasi.com

- 17 by mailing a copy thereof contained in a sealed envelope, with postage paid, and deposited in the United
- 18 States Post Office in Newport, Oregon on the date set forth below.
 - Dated this 3rd day of December, 2004.
- 19

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21

22 <u>Complainant</u>:

- Central Lincoln People's Utility District 23 2129 North Coast Highway Newport, Oregon 97365 24 (541) 265-3211
- 24 (341) 203-3211
- 25
- 26

Charles M. Simmons, OSB No. 02455 Of Attorneys for Complainant

Attorneys for Complainant:

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