



Jason D. Topp
Senior Counsel - Regulatory
(651) 312-5364

September 24, 2018

Mr. Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

**Re: In the Matter of a Commission Inquiry into CenturyLink's Compliance
with TAP Statutes and Rules
Docket No. P-421/CI-17-796**

Dear Mr. Wolf:

Enclosed for filing is Qwest Corporation dba CenturyLink QC's Motion for Clarification and Reconsideration regarding the above-referenced matter.

Very truly yours,

/s/ Jason D. Topp

Jason D. Topp

JDT/bardm

Enclosures

cc: Service List

**STATE OF MINNESOTA
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

Nancy Lange	Chair
Dan Lipschultz	Commissioner
Matt Schuerger	Commissioner
Katie Sieben	Commissioner
John Tuma	Commissioner

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AFFIDAVIT OF SERVICE

STATE OF MINNESOTA)
) ss
COUNTY OF HENNEPIN)

Dianne Barthel hereby certifies that on the 24th day of September, 2018, she e-filed a true and correct copy of Qwest Corporation dba CenturyLink QC's Motion for Clarification and Reconsideration by posting it on www.edockets.state.mn.us. Said document was also served on the service list via U.S. mail and e-mail as designated with the Minnesota Public Utilities Commission.

/s/ Dianne Barthel _____
Dianne Barthel

Subscribed and sworn to before me
this 24th day of September, 2018.

/s/ LeAnn M. Cammarata _____
Notary Public

My Commission Expires Jan 31, 2020

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_17-796_Official PUC
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_17-796_Official PUC
Ian	Dobson	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	No	OFF_SL_17-796_Official PUC
Ron	Elwood	relwood@mnlisap.org	Mid-Minnesota Legal Aid	2324 University Ave Ste 101 Saint Paul, MN 55114	Electronic Service	No	OFF_SL_17-796_Official PUC
Lisa	Herdman	lisa.herdman@vertexinc.com	Vertex, Inc.	2301 Renaissance Blvd King of Prussia, PA 19406	Paper Service	No	OFF_SL_17-796_Official PUC
Jason	Topp	jason.topp@centurylink.com	CenturyLink	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_17-796_Official PUC
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_17-796_Official PUC

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**In the Matter of a Commission Inquiry into
CenturyLink's Compliance with TAP Statutes
and Rules**

Docket No. P-421/CI-17-796

**QWEST CORPORATION DBA CENTURYLINK QC'S MOTION
FOR CLARIFICATION AND RECONSIDERATION**

Pursuant to Minn. R. 7829.3000, Qwest Corporation dba CenturyLink QC ("CenturyLink") files a motion for clarification and reconsideration of portions of the Commission's Order issued September 12, 2018. At the Commission meeting to consider this matter, CenturyLink agreed to most components of the Order. However, in attempting to comply with its terms, it recommends that the Commission make some minor modifications to the Order.

1. CenturyLink suggests that the Commission delegate the review and approval of reports required by Sections 1a and 1e of the Order to Staff.

CenturyLink respectfully requests that the Commission consider delegating to the Executive Secretary the review of the following reports required by the Order:

1.a. An explanation of how employees are trained to ensure that customers are given accurate TAP program information. The explanation must include training material, which customer service representative groups receive TAP training, the frequency with which CenturyLink personnel receive ongoing training to ensure that the TAP program is understood, and any additional information to demonstrate that CenturyLink is taking appropriate steps to achieve the statutory goal of making the TAP program available to eligible Minnesotans.

1.e. A report identifying each Minnesota customer denied TAP benefits over the last two years due to receiving Lifeline benefits from another provider. The report must include the following documentation:

- i. The length of time each affected customer was denied TAP benefits;
- ii. Whether the customer is currently enrolled in TAP;

- iii. Whether the Company has now enrolled the customer or a statement explaining why the customer is not enrolled;
- iv. The amount of TAP credits that should have been provided had the customer been properly enrolled.

The Order does not specify a procedure after each of these reports is filed and CenturyLink has been advised that, in the absence of a delegation to the Executive Secretary, these filings would be subject to a formal review and comment process. Such a process seems unnecessary and, to the extent there are comments about the documents, such review and commentary could be handled informally. In the event the informal process does not resolve any disputes, the issue could be handled by more formal procedures.

CenturyLink does intend to make these filings in the docket and make them available to all parties for review. Nonetheless, delegating review to staff would allow more flexibility and allow the potential to resolve any issues associated with the filings in a more efficient manner.

2. CenturyLink requests clarification on the requirement to provide credits to customers.

Section 1.d. of the Order requires the following:

For each eligible customer who was denied TAP credits in the past two years as a result of receiving Lifeline benefits from another provider, issue credits to each of those customers in the amount that should have been provided had the customer been properly enrolled in TAP.

Customers that potentially fit within this paragraph fall in three categories: (1) customers still receiving service from CenturyLink; (2) customer who at the time of the application received service but no longer receive service; and (3) customers who never received service from CenturyLink.

The first category of customers presents no problem. CenturyLink has already provided credits to customers that still receive service from the company.

The second category of customers is more problematic. Such customers do not have an account on which to provide credits. CenturyLink theoretically could attempt to send refunds to such customers, but it will likely not have current contact information to send a refund.

The third category of customers is even more problematic. Not only is CenturyLink without contact information but also the customer never received service and may have received a TAP credit from another provider.

If the Commission does not intend for customers in the second and third categories to receive credits, no clarification of the Order is necessary. The Order requires credits be given and credits are not possible if the customer does not have an account. If, however, the Commission does intend credits for such customers, clarification of the Order to direct how such credits should be given and how to calculate the appropriate amount of credit would allow CenturyLink to comply. CenturyLink respectfully asks for guidance on this issue.

CONCLUSION

CenturyLink respectfully requests that the Commission:

1. Delegate review of the reports required by Sections 1.a and 1.e of the Order to the Executive Secretary; and
2. Clarify, if necessary, how the requirement of credits in Section 1.b should be implemented with respect to customers that no longer receive service from CenturyLink or never received service from CenturyLink.

Dated this 24th day of September, 2018.

**QWEST CORPORATION DBA
CENTURYLINK QC**

/s/ Jason D. Topp

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