


COMMONWEALTH OF PENNSYLVANIA



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June 22, 2020

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Re: The United Telephone Company of Pennsylvania LLC
d/b/a CenturyLink 2018 Annual Price Stability Index/
Service Price Index Report
Docket No. R-2018-3004019

The United Telephone Company of Pennsylvania LLC
d/b/a CenturyLink 2019 Annual Price Stability Index/
Service Price Index Report
Docket No. R-2019-3012238

Office of Consumer Advocate v. CenturyLink
Docket Nos. R-2019-3012876
C-2018-3001871

Dear Secretary Chiavetta:

Attached for electronic filing please find the Office of Consumer Advocate's Exceptions in the above-referenced proceedings.

Copies have been served on the parties as on the enclosed Certificate of Service.

Respectfully submitted,

/s/ Barrett C. Sheridan
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Enclosures:

cc: The Honorable Benjamin J. Myers (**email only**)
The Honorable Joel H. Cheskis (**email only**)
Office of Special Assistants (**email only:** ra-OSA@pa.gov)
Certificate of Service

*290456

CERTIFICATE OF SERVICE

Re: The United Telephone Company of Pennsylvania LLC	:	
d/b/a CenturyLink 2018 Annual Price Stability	:	R-2018-3004019
Index/Service Price Index Report Filing	:	
	:	
Office of Consumer Advocate	:	
v.	:	
The United Telephone Company of Pennsylvania LLC	:	C-2018-3005400
d/b/a CenturyLink	:	
	:	
The United Telephone Company of Pennsylvania LLC	:	
d/b/a CenturyLink 2019 Annual Price Stability	:	R-2019-3012238
Index/Service Price Index Report Filing	:	
	:	
Office of Consumer Advocate	:	
v.	:	
The United Telephone Company of Pennsylvania LLC	:	C-2019-3012876
d/b/a CenturyLink	:	

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate’s Exceptions, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 22nd day of June 2020.

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Dated: June 22, 2020
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I. INTRODUCTION

Pending before the Pennsylvania Public Utility Commission (PUC or Commission) is the Joint Petition for Settlement Agreement (Settlement) entered into by the Office of Consumer Advocate (OCA), the Office of Small Business Advocate (OSBA), and the United Telephone Company of Pennsylvania d/b/a CenturyLink (CenturyLink or Company). The Settlement – if approved by the Commission – would resolve the OCA’s formal complaints against CenturyLink’s respective August 29, 2018 Price Stability Mechanism (PSM) Filing and August 30, 2019 PSM Filing. (collectively, PSM Filings). For the purpose of settlement, the Parties have set aside litigation of the questions of law and fact regarding the impact of the Tax Cuts and Jobs Act (TCJA) on CenturyLink’s intrastate tax expenses related to non-competitive services and possible recognition under the terms of the Company’s Amended Chapter 30 Plan PSM. The Settlement provides the Company’s non-competitive service customers with specific benefits in the form of three years (2018, 2019, and 2020) of PSM Filings which do not increase rates and which add zero to the Company’s bank of deferred revenue increases. In addition to the benefit of rate stability and zeroing out of three years of allowed revenue increases, the Settlement provides benefits to the OCA, OSBA, Company and Commission by conserving resources.

Through these Exceptions, the OCA respectfully disagrees with the June 2, 2020 Recommended Decision (R.D.) issued by the Office of Administrative Law Judge (OALJ) which recommends that the Commission reject the Settlement and remand the matter for further hearings. Chief Deputy Administrative Law Judge Joel H. Cheskis and Administrative Law Judge Benjamin J. Myers (collectively the ALJs) fault the Settlement as not responsive to the Commission’s “directive” that the question whether the TCJA qualifies as an exogenous event be

fully litigated and produce an evidentiary record to assist the Commission in its overall investigation of the impact of the TCJA on incumbent local exchange carriers. The OCA submits that the Commission's agency interest should not preclude a determination that the Settlement is in the public interest, based upon the specific facts and terms of CenturyLink's Chapter 30 Plan, including its bank of allowed revenue increases.

Contrary to the ALJs' determination, the Settlement is in the public interest. The exogenous event questions of fact and law, if resolved, would at best result in quantification of a number for input into the annual calculation of the Company's PSM formula. The Settlement focuses on the end result of the amount of allowed revenue increases available to CenturyLink tied to three PSM filings and provides protection against increases for non-competitive residential and business services. The Settlement is in the public interest and should be approved by the Commission.

II. EXCEPTIONS

OCA Exception No. 1: The ALJs Err By Concluding That The Commission's Agency Interest In A Fully Litigated Record To Assist The Commission In Matters Outside Of This Formal Complaint Proceeding Controls This Proceeding. (R.D. at 2-4, 7, 16-30)

In the R.D., Chief Deputy Administrative Law Judge Joel H. Cheskis and Administrative Law Judge Benjamin J. Myers (collectively the ALJs) recommend that the Commission reject the Settlement "because it fails to respond to the directives provided by the Commission which sought a determination of whether the Tax Cut and Jobs Act of 2017 qualifies as an exogenous event under the incumbent local exchange carrier's alternative regulation and network modernization plan." R.D. at 2. The ALJs cite the Commission's October 2018 Order, entered in the Commission's generic investigation proceeding to determine the effects of the TCJA on

public utilities, as the source of these Commission “directives.” See, e.g. R.D. at 4, 7, 16, 19, 20, 26, 28, 29; citing Tax Cuts and Jobs Act of 2017 Petition to Rescind Secretarial Letter and Discontinue Temporary Stay, Docket No. M-2018-2641242, Order at 3-5, 7 (Oct. 25, 2018) (October 2018 Order). The ALJs recommend rejection of the Settlement and remand of the OCA formal complaints for hearings because the Parties have not satisfied the Commission’s agency interest in obtaining “the benefit” of a fully developed record to aid the Commission’s generic investigation and analysis of issues outside of the scope of the formal complaint litigation. R.D. at 16-17, 19, 20, 25, 26.

The OCA excepts to the ALJs’ determination that the Settlement cannot be approved because it does not fulfill the Commission’s agency interests as set forth in the Commission’s October 2018 Order regarding the Commission’s generic TCJA investigation at Docket No. M-2018-2641242. The ALJs have erred in their recommendation.

The scope of this proceeding is defined by the OCA’s two pending formal complaints against CenturyLink’s 2018 and 2019 PSM filings. The Commission has determined that each PSM filing is “procedurally consistent” with the Company’s Chapter 30 Plan, subject to adjustment upon resolution of the respective OCA formal complaint. In this proceeding, the Commission should serve as a neutral adjudicator in evaluating the merits of the Settlement.

In August 2018, the Commission temporarily stayed the Commission’s own generic investigation of the impact of the TCJA on ILEC rates and revenues. The Commission justified the temporary stay, pending resolution of the OCA formal complaints by “final adjudications,” as sound practice: “[i]n this fashion, the Commission will avoid any prejudgment of any issues that remain pending before it” Tax Cuts and Jobs Act of 2017, Docket No. M-2018-2641242, Secretarial Letter at 1 (Aug. 9, 2018) (August 2018 Secretarial Letter); see R.D. at 16.

The Commission's October 2018 Order denied a petition to rescind the August 2018 Secretarial Letter, affirmed that the temporary stay of the Commission's generic proceeding would continue, and advised the petitioning ILECs of the procedural opportunities to participate and represent their individual interests in the formal complaint dockets. October 2018 Order at 5-10, Ordering ¶¶ 1-4. The Commission agreed with OCA that "the outcome of the Formal Complaint proceedings will depend, in part, on the particular facts of each utility." Id. at 8.

In both the August 2018 Secretarial Letter and the October 2018 Order, the Commission anticipated that litigation of the OCA formal complaints would include the development of an evidentiary record. August Secretarial Letter at 1; October 2018 Order at 3-4; see R.D. at 16-17. The October 2018 Order stated that "the procedure the Commission is following with respect to the OCA's complaints is proper..... More importantly, the Commission's generic investigation will be aided by a fully developed evidentiary record regarding exogenous events and other provisions in carriers' Chapter 30 plans." October 2018 Order at 7; see R.D. at 17.

The ALJs' position that the resolution of the OCA formal complaints must provide the Commission with a fully developed evidentiary record, to satisfy a perceived "Commission directive" is incorrect. The Commission should not judge the Settlement based upon whether it will assist the Commission in its generic TCJA investigation. This would be at odds with the Commission's commitment to be a neutral adjudicator of the formal complaints and allow for different outcomes particular to each ILEC. To avoid this inherent conflict of roles and interests, the Commission's statements in the October 2018 Order regarding the development of records in the separate complaint proceedings cannot be viewed as attempting to control a separate complaint case. Indeed, the ALJs at least three times refer to the Commission's interest in a fully

developed evidentiary record as a ‘request’ which is different from a directive or mandate. R.D. 19, 20, 25.

The Commission should review and approve this Settlement on its own merits as in the public interest and a fair resolution of the contested CenturyLink 2018 and 2019 PSM Filings. The Commission should not reject the Settlement and remand matters back to the OALJ with a direction that the OCA, OSBA, and Company develop an evidentiary record, to assist the Commission in its own generic TCJA investigation.

OCA Exception No. 2: The ALJs Err In Recommending Rejection Of The Settlement Because The Question Of Whether The TCJA Impact On CenturyLink Qualifies As An Exogenous Event Is Unresolved (R.D. at 2-4, 7, 16-26, 28-30)

The R.D. states that “the settlement will be rejected because it fails to determine whether the passage of the TCJA is a qualifying exogenous event” under the Company’s amended Chapter 30 Plan. R.D. at 17. The ALJs again view the Commission’s statements in the October 2018 Order as binding, where the “Commission specifically directed ... that this issue be ‘decided.’” Id. The OCA disagrees.

Resolution of the exogenous event questions of fact and law would be but an interim step in determining whether and what level of revenue change should result from each contested CenturyLink PSM filing. The Parties have negotiated a unanimous Settlement which provides benefits, even though the Parties have reserved their respective positions “concerning the TCJA and the exogenous event language in CenturyLink’s Amended Chapter 30 Plan. Settlement, App. A, Proposed Findings of Fact, ¶ 32. Significantly, the Settlement provides that CenturyLink’s cumulative bank of allowed revenue increases will reflect zero dollars added for

2018, 2019, *and* the upcoming 2020 PSM filing. The OCA submits that the Commission can and should approve the Settlement as in the public interest.

In 2013, the Commission approved a unanimous settlement petition to resolve OSBA and OCA formal complaints against a CenturyLink tariff filing which proposed to implement a portion of the Company's bank of allowed revenue increases. Pa. PUC v. United Telephone Co. of Pa., d/b/a CenturyLink, Opinion and Order, Docket No. R-2013-2367099, et al (July 29, 2013)(CenturyLink 2013). The Commission approved the settlement as "a reasonable compromise" and in the public interest, even though the settlement did not resolve an "outstanding legal issue" concerning CenturyLink's Chapter 30 plan language and the possible mid-year change in rates. Id. at 17. The Commission took into account the narrow scope of the settlement and cautioned other ILECs that it did not set a precedent. Id. at 18. The Commission should follow this same approach in this proceeding and approve the Settlement.

The Commission has approved numerous settlements of other contested PSM or PSI filings by ILECs. Indeed, this Settlement would not be the first settlement of a request for recognition of an exogenous event. Commonwealth Telephone Company was one of several ILECs to petition in 2003 for recognition of certain changes in revenues and expenses as exogenous events. Each contested petition was resolved by a settlement approved by the Commission, based on facts specific to the ILEC.¹

In May 2008, the Commission approved a settlement between Verizon Pennsylvania Inc. (Verizon PA) and OSBA related to the mechanics of Verizon PA's 2006 Price Change

¹ See, e.g., Petition of Commonwealth Telephone Company for Recognition of an Exogenous Event under its Alternative Regulation Plan, Docket Nos. P-00032020, P-00961024F0002, P-00961024, R-00027695, Tentative Order adopting the R.D. of ALJ Smolen (July 21, 2003) (Pursuant to the settlement, the ILEC: 1) withdrew the petition and recalculated its PSI/SPI filing without an exogenous event factor; 2) obtained permission to amend its Chapter 30 Plan banking language to allow for banking of decreases; and 3) agreed to adjust its STAS to provide a STAS-related refund).

Opportunity filing and Chapter 30 Plan language. The Commission approved the settlement as in the public interest because the benefits outweighed the Commission’s earlier concerns regarding certain “legal and technical imperfection issues.” Verizon Pennsylvania Inc. 2006 Price Change Opportunity Filing, Docket No. R-00051228, Opinion and Order at 17 (May 27, 2008) [other history omitted]. Those benefits included an end “to the risks and administrative costs of continued litigation,” plus administrative certainty for the ILEC as to future filings. Id. The Commission approved the settlement as overall reasonable and legally sustainable, with benefits for both the ILEC and end-user ratepayers. Id.

Rather than focus on what the pending Settlement does not do, the Commission should determine that the affirmative provisions and agreement of the Parties will provide benefits to CenturyLink’s ratepayers, and so should be approved as in the public interest. This Settlement does not seek to create a precedent, but rather is tailored to the particular facts of CenturyLink’s Chapter 30 Plan PSM operations and banking provisions. See, e.g. Settlement, ¶¶ 12, 27, 28, 29, 34.

OCA Exception No. 3: The ALJs Err In Recommending That The Settlement Be Rejected Due To A Lack Of Substantial Evidence To Support A Public Interest Determination
(R.D. at 2-4, 7, 16-26, 28-30)

Based upon their review of the Parties’ Statements in Support and the verified statements of Dr. Loube (OCA), Mr. Gillan (OSBA) and Mr. Harper (CenturyLink), the ALJs conclude that the Settlement is not supported by substantial evidence in the absence of a fully developed evidentiary record “responsive to the Commission’s request.” R.D. at 20, citing October 2018 Order at 7. The ALJs cite a lack of substantial evidence that the core agreement that CenturyLink will forego banking approximately \$1.3 million is in the public interest. R.D. at 20-

25. The ALJs fashion a scenario in which a \$1.3 million negative surcharge to pass through to CenturyLink's consumers tax savings (which the Parties have not agreed exist) would better serve the public interest. R.D. at 23-24, 26. Each expert witness – Dr. Loube, Mr. Gillan, and Mr. Harper – cited the lack of financial and tax accounting data as a barrier to any determination of the impact of the TCJA on CenturyLink's intrastate, non-competitive service related tax expense. The ALJs' response is that the Settlement should be rejected and the remanded and further resources should be expended to provide a fully developed evidentiary record. R.D. at 24-26.

The OCA disagrees with the ALJs' conclusion that the Settlement is not supported by substantial evidence, is not in the public interest, and should be remanded regardless of the administrative burdens and financial costs to the OCA, OSBA, and Company. Counsel for the OCA, OSBA, and CenturyLink have drawn upon their deep knowledge of the Chapter 30 legal framework in general and CenturyLink's Chapter 30 Plan in particular, as well as the discovery conducted in this case, to develop the proposed Settlement. The witnesses provided verified statements as evidence in support of the settlement. The ALJs fail to recognize how Chapter 30 alternative ratemaking is fundamentally different from rate base/rate of return regulation of other utilities. The Commission should approve the Settlement.

a. The Company's Agreement to Forego Allowed Revenue Increases Provides A Benefit To Consumers

As summarized in the Settlement, CenturyLink's 2018 and 2019 PSMs are rate cases. In accord with its Chapter 30 Plan PSM provisions, CenturyLink gives advance notice, and later CenturyLink files its PSM report and calculations. It is CenturyLink's choice whether to implement an allowed revenue increase or bank the increase. If the PSM filing indicates that

CenturyLink should decrease revenues, the CenturyLink's Chapter 30 Plan banking language allows CenturyLink to bank the revenue decrease for up to four years. Settlement ¶ 12, citing CenturyLink Amended Chapter 30 Plan (approved June 23, 2005), at p. 24. If the PSM filing indicates that CenturyLink may increase revenues, CenturyLink may add the allowed revenue increase to its cumulative bank, without limitation as to time. *Id.* The Commission reviews the Company's PSM Filings for compliance with the Company's Chapter 30 Plan language and correctness of the filing and calculations.

As part of the terms of the Settlement, CenturyLink is committing to give up each of the allowed increases in revenues calculated by the Company's 2018 and 2019 PSM filings. The OCA contested both PSM filings, in order to provide CenturyLink non-competitive service customers with some benefit from possible TCJA tax expense savings. As part of the Settlement, CenturyLink is committing to not implement a rate increase or bank the expected allowed revenue increase based upon the Company's late summer 2020 PSM filing. This Settlement provision assures CenturyLink ratepayers that their rates for non-competitive services will remain at present levels through mid-December 2021. See, Settlement, App. D, OCA Statement in Support.

Litigation of the exogenous event question could result in a determination that the TCJA provided CenturyLink with zero tax savings "because CenturyLink did not pay federal income taxes on 2018 and will not for several years." Harper St. at 3-4; see R.D. at 21. Based upon CenturyLink's specific facts, Mr. Harper stated that full litigation of the impact of the TCJA upon intrastate services that are subject to the PSM would be an "unneeded exercise." *Id.* And an exercise which would leave the full 2018 PSM and 2019 PSM amounts as additions to CenturyLink's cumulative bank.

Dr. Loube and Mr. Gillan also testified as to the significant risks and uncertainties should the exogenous event question be litigated. “Even if the Commission wished to proceed to establish a method to allocate the reduction of the federal tax liability among the non-regulated sector, the interstate jurisdiction and the intrastate jurisdiction, it would then be necessary to develop a method to allocate cost and tax liability between Pennsylvania telecommunications competitive and non-competitive services.” Loube St., ¶ 4. Mr. Gillan bluntly testified:

the regulatory tools needed to attribute a portion of the federal income tax reduction to jurisdictionally intrastate services ... have been discarded over the past 35+ years. As a result, there is no off-the-shelf methodology to determine what portion (if any) of a reduction in federal income tax liability should be allocated to intrastate Pennsylvania services.

Gillan St., ¶ 8. Even if full litigation identified tax savings and quantified the adjustment to factor into the Company’s contested PSM filings, Dr. Loube explained that CenturyLink’s pre-2018 cumulative bank of \$9.6 million in allowed revenue increases (before the 2018 and 2019 PSM filings) would allow CenturyLink to offset any revenue reduction identified by litigation. Loube St. ¶ 18. Dr. Loube and Mr. Gillan each determined that the Settlement provides valuable concessions and benefits in the form of rate stability which would not result from litigation. Loube St. ¶¶ 3, 18; Gillan St., ¶¶ 9-11.

The Commission should find that the terms of the Settlement, which provide that CenturyLink will forego approximately \$1.3 million – the sum of three PSM based revenue increases – and not increase rates as part of its upcoming 2020 PSM filing, is in the public interest, for the reasons discussed in the Parties’ statements in support and the verified expert witness statements. See, CenturyLink 2013, at 17-18 (No rate increase with the next PSM filing is a benefit). The presiding ALJ in the 2010 CenturyLink and Qwest change of control case found a similar commitment persuasive support for a settlement. See, Joint Application for

Approval under Ch. 11 of the Pennsylvania Public Utility Code of Change of Control of Qwest Communications Co., LLC, Docket No. A-2010-2176733, R.D. at 21 (Sept. 24, 2010), R.D. adopted by Order (Oct. 14, 2010). Yet, the ALJs in this proceeding unreasonably require a fully developed evidentiary record to assist the ALJs in evaluating the merits of these Settlement terms. The Commission should not adopt the ALJs' newly created standards for approval of a Settlement.

b. The Settlement Is In The Public Interest Because It Will Benefit The Parties And Allow Them To Conserve Resources

The Parties entered into the proposed Settlement after broad and extensive discovery² but before development of testimony, followed by hearings and briefs. The Settlement reflects the informed judgment of the Parties that the negotiated terms are in the public interest. The ALJs recommend that the Commission reject the Settlement and basically 'roll the dice' to see if full litigation of the exogenous event issue will result in a reduction to CenturyLink's intrastate, non-competitive service rates. The OCA submits that the ALJs' position is unfounded and should not be the cause for rejection of the Settlement.

As Dr. Loube, Mr. Gillan, and Mr. Harper testified, CenturyLink's financial and regulatory accounting framework is not set up to support traditional rate base / rate of return type inquiries because regulation of the telecommunications industry has changed over the past 30 or so years at both the federal and state levels. Section 3015(g) is a prime example of these limits under alternative regulation. Section 3015(g) restricts, in pertinent part, the Commission's filing and audit requirements for CenturyLink to:

- (2) An annual financial report consisting of a balance sheet and income statement.
- ...
- (6) An annual access line report.

² The statements of Dr. Loube, Mr. Gillan, and Mr. Harper are informed by the Parties' discovery.

(7) An annual statement of gross intrastate operating revenues for purposes of calculating assessments for regulatory expenses.

66 Pa.C.S. § 3015(e). The ALJs' criticism of CenturyLink's recordkeeping is not soundly based. See, R.D. at 25. Under the ALJs' proposed remand, the Parties would have to spend more resources to obtain and break-down information, because Chapter 30 does not require ILECs to report financial information at such a detailed level.

The ALJs also unreasonably dismiss the jurisdictional allocation difficulties described by Dr. Loube, Mr. Gillan, and Mr. Harper. As discussed above, the verified expert statements explain the significant impediments, if identification of a reasonable measure of CenturyLink's intrastate, non-competitive service-related tax expenses are the goal. Indeed, the Commission has first-hand experience with the jurisdictional allocation difficulties, in the context of confirming a carrier's gross intrastate operating revenues for the purpose of Section 510 assessments. See, Policy Statement Regarding the Reporting of Intrastate Operating Revenues, Docket No. M-2018-3004578, Final Policy Statement Order, 49 Pa.B. 5003 (Aug. 31, 2019).

The Commission should not reject the Settlement and remand the formal complaints for development of a record on the exogenous event questions and quantification of an adjustment, as recommended by the ALJs. See, R.D. at 21. In addition to the reduction to CenturyLink's cumulative bank of allowed revenue increases and rate stability benefits, the Settlement provides the benefit of less litigation and conservation of the Parties' resources as well as the Commission's administrative resources.

The OCA submits that the Settlement provides benefits to CenturyLink's ratepayers and provides a reasonable resolution to complex and difficult issues. The Settlement provides a mutually-agreed upon resolution of what level of revenues and rates should result from the Company's contested 2018 and 2019 PSM filings, without the expense and administrative

burden of full litigation of the questions of law and fact tied to the PSM recognition of the impact of the TCJA on Century's intrastate, non-competitive services-related tax expenses. See, Settlement, App. D, OCA Statement in Support.

III. CONCLUSION

The Office of Consumer Advocate respectfully disagrees with the Recommended Decision of the presiding officers. The OCA requests that the Commission approve the Settlement in its entirety and without modification as in the public interest, reject the ALJs' recommendation, and not remand matters back to the Office of Administrative Law Judges for further proceedings.

Respectfully Submitted,

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