Docket Nos. UM 1908/UM2206
WITNESS: PRISCILLA WEAVER

PUBLIC UTILITY COMMISSION
OF
OREGON

INTERVENOR PRISCILLA WEAVER EXHIBIT 200

INTERVENOR PRISCILLA WEAVER'S SUBMISSION REGARDING SEPTEMBER 2023 OUTAGES AND LUMEN'S RESPONSE

DECEMBER 5, 2023

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1908, UM 2206

IN THE MATTER of LUMEN TECHNOLOGIES	INTERVENOR PRISCILLA WEAVER'S SUBMISSION REGARDING SEPTEMBER 2023 OUTAGES AND LUMEN'S RESPONSE

What happened in the rural Jacksonville area over Labor Day weekend and in its aftermath is a mix of striking coincidence, Commission action, and a Lumen "triage" process put in place in response to Order 23-356. I have tried to distill all this to its hopeful, albeit preliminary, bottom line.

On September 2 we experienced our third annual Labor Day weekend outage caused by Lumen's failing infrastructure. As if that were not enough, the next day a second, unrelated outage occurred, this one caused by a vehicle bashing into a green Lumen box near Jacksonville.

As a result,

(1) Unlike the Labor Day outages in 2021 and 2022, and thanks to the looming threat of Lumen fines in the Rural Jacksonville Orders,[1] the September 2, 2023, outage was promptly resolved, but in the process,

[1] Order Nos. 22-340, 22-422, and 23-209 ("RJ Orders").

(2) customer experience in reporting the 2023 Labor Day outages, *i.e.*, the trigger to initiate the required "immediate resolution" of the outage (Order NO. 22-340 Att. A page 8) confirmed that Lumen had never been in compliance with this part of the RJ Orders, and so

(3) the Commission issued order No. 23-356 to give Lumen another chance to comply, and then

(4) on October 27, just four days after Lumen filed its Response to Order 23-356 describing the procedures it had finally put in place to comply with the RJ Orders, we had yet another outage. I never want an outage, but this one certainly was timely for testing Lumen's new procedures.

As to the bashed box outage, I agree with Lumen, Staff, and CUB it was a force majeure event. I do not have the technical knowledge to evaluate whether the repair was expeditious; I rely on Staff's conclusion that it was.

As for the new procedures, the "dedicated number" prong of the triage mechanism described on pages 4-5 of Lumen's Response to Order 23-356 passed its first test. I was at home on October 27 when the phones went out. I called the dedicated number and reached CenturyLink operator Jared on a clear line, no roosters. Once he confirmed I had no dial tone, he created my trouble ticket. He also created tickets for several of my neighbors who I had learned also were out. Jared assured me "doing multiple tickets isn't that hard." In short, if everyone in the rural Jacksonville area consistently has the same experience calling the dedicated number going forward, this first step in the required process can be effective.

Jared said his next step was to send an email (described in Lumen Response, page 9) to the "dispatch and field ops" Lumen personnel, who presumably are tasked with the "immediate

initiation of onsite repair" required by the RJ Orders. He also called me back at 6:30 to let me know the problem was a cable failure. Thankfully, our phones came back on after about 2 or 3 hours.

Ironically, I do not know whether the new "email to ... dispatch and field operation groups" triggered the prompt repair and so I cannot comment on whether this part of Lumen's new process will be effective going forward. That is because I also understand another customer, someone who has an inside track to a local CenturyLink technician (perhaps the same duo of customer CB and tech Matt involved in the first Labor Day weekend outage as described on page 2 of Lumen's Response?) may have called the local tech again this time. I do not know whether that technician called in the outage to dispatch (?) or field ops (?) or simply decided to start the repair on his own before Jared's email set the repair process in motion internally at dispatch or field ops. In any case, this part of the process is not clear from Lumen's response.

Maybe the "triage" part came into play (promptly alerting field ops and initiating priority repair) and so it also can work going forward, or maybe we must wait for the next outage to have it tested. Either way, to rely on the happenstance of a customer with private access whose phone might or might not be part of an outage realizing his phone is out and calling his private channel, and that technician maybe or maybe not answering his phone and maybe or maybe not being able to start the repair, obviously is not a sustainable solution. This ad hoc approach was our only hope of prompt repair from at least 2014 until Order 22-340 was entered a year ago. We are entitled to have both sustainably reliable phone service and

sustainably reliable repair service and that's what the enforcement mechanism in the RJ Orders coupled with Lumen's new triage process should give us.

What is crystal clear is this: Jared assured me that whoever provided him with his instructions is "definitely taking it seriously" and that means the enforcement provisions in the RJ Orders are having the effect the Commission intended – the shortest possible outages in our vulnerable location. We are grateful to have the Orders in place as a necessary antidote to Lumen's unreliable land line service. It's about time.

A brief note about communicating with customers. (Lumen Response pages 10—13). Lumen's reliance on its Facebook marketing page is not the answer. Millions of people no longer or never did use Facebook; some of us do not even have reliable internet out here. To ask us to scroll through sales pitches for Lumen products to get to an outage update is tone-deaf at best. Pacific Power uses automatic callbacks to notify us when power comes back on. Lumen might consider installing such a system as well.

Respectfully submitted,

Priscilla Weaver

Dated: October 31, 2023

Priscilla Weaver, Intervenor
6268 Little Applegate Road
Jacksonville OR 97530
541-899-1672
priscilla@saltmarshranch.com