

Columbine Telephone Company, Inc.
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IDAHO PUBLIC
UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF COLUMBINE TELEPHONE)
COMPANY, INC.'S APPLICATION TO CHANGE) Case No. COL-T-21-01
THE MANNER IN WHICH FACILITIES)
EXTENSIONS ARE HANDLED)

REPLY OF COLUMBINE TELEPHONE COMPANY, INC. TO COMMENTS OF THE COMMISSION STAFF

Columbine Telephone Company, Inc. dba Silver Star Communications (the "Company") hereby replies to the Comments of Commission Staff, as follows.

As noted in the Company's tariff advice filing made on May 14, 2021, the purposes of the proposed changes are to (1) simplify the drop extension process to the customer and (2) substantially decrease the time to delivery of services to the customer. These changes have been developed in part based on customer request and feedback that the current process is complicated and hinders customers' timely access to services.

A flat fee substantially simplifies the customer process by eliminating the need for multiple site visits, extension cost calculations, and customer pre-payment of costs exceeding the \$1,600 aid to construction prior to construction completion and any resulting true-up. In turn, a simplified process substantially decreases the time to deliver services, down from two-three weeks to two-three days.

While Staff is technically correct in its analysis that under the outdated scheme of accounting for line extensions a customer would typically not pay if the cost did not exceed the stated aid amount, the

Company's analysis shows that a majority of customer extensions do exceed the stated aid amount, ranging from \$500 to \$1,200, with the average line extension exceeding the aid to construct by approximately \$400 (reference Confidential Attachment A, representing an analysis of historical drop costs and customer payments).

Further, responding directly to Staff's concern that the proposed changes increase a charge, since the average amount a customer will pay for a line extension is \$400 and the Company proposes a flat fee of \$350, the proposed change effectively decreases a charge. Streamlining the process is more cost effective than the current process which savings are reflected in the \$350, rather than \$400, proposed flat fee. In addition, customers may still elect for the Company to excavate and place the facilities, which would be done at the Company's current hourly rate, and which is no different than its current process. However, allowing customers the option to excavate the desired facilities route further streamlines the process and creates cost-efficiencies, since it is often the case that power and phone facilities are in the same trench and the power companies generally require the customer to provide their own trench, this process further aligns with utility industry standards.

The Company's proposed changes seek to align its operational across the jurisdictions in which it provides service, and these changes do align with its commission-approved practice in Wyoming.

The mere fact that a practice is different compared to others in the industry does not prohibit said practice, nor is it a foregone conclusion that the practice is not in the best interest of the consumers. Whether or not the Company's practices are the same as other similarly situated providers is not a determining factor of whether or not the Company's proposed changes are best for its customers and its business operations. Each Company is different, has different geographic characteristics, a different customer base, and different operational needs. The Company agrees with the Commission Staff analysis with respect to the language included in its comments; however, placing

this into context for Commission consideration, most of the tariffs have been on file since as early as 1991, with no substantive changes since – which is at individual companies’ discretion. The same is true in this case, with respect to the practice the Company proposes to modify, and this change is consistent with monitoring and implementing best practice tariff updates in order to remain current and relevant in an ever-changing industry. The Company has not modified its line extension practices in over 20 years; processes, costs, services and operational needs have substantially changed over that time – a line extension is no longer a copper drop for a party line voice service; it is now a highly technical fiber cable connection enabling voice and broadband service. Modified practices reflect the industry changes.

No public comment has been received in this matter, and the Company believes further delaying the implementation of the Company’s updated practice could in fact harm its customers for the reason that the Company’s operations will be under disparate customer practices, potentially causing confusion and a higher margin of error in determining facilities extension costs. The Commission has already set a comment and reply comment deadline in this docket and further extending the timeframe will negatively impact the Company and its customers, because it will not be able to proceed with the updated practices for some period of time down the road, pending Commission approval.

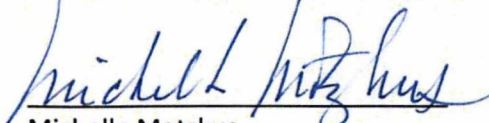
The Company’s customers have requested, on numerous occasions, that the Company simplify its line extension practices; over the past two years, a substantial number of new construction customers have made comment on the complicated and seemingly archaic practice the Company uses to extend facilities.

For the reasons stated herein, Columbine Telephone Company, Inc. respectfully submits it has met its burden of proof justifying its request to modify its line extension practices as represented in its

tariff advice filing and respectfully requests the Commission approve the Company's proposed tariff changes, as submitted, effective immediately upon the Commission's Order.

Dated: July 15, 2021

Columbine Telephone Company, Inc.



Michelle Motzkus

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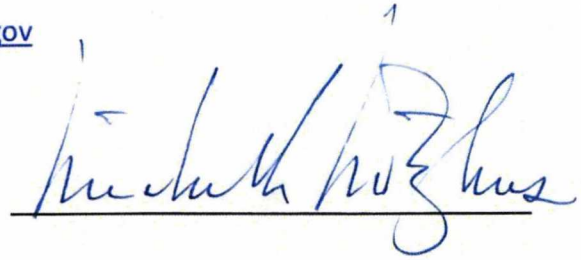
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Certificate of Service

I hereby certify that I have this 15th day of July, 2021, served the foregoing Reply of Columbine Telephone Company, Inc. to Comments of the Commission Staff, in Case No. COL-T-21-01 by emailing a copy thereof to the following:

MATT HUNTER
DEPUTY ATTORNEY GENERAL
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Attn: Jo Nelson, Secretary: Jo.Nelson@puc.idaho.gov

A handwritten signature in blue ink, appearing to read "Matt Hunter", is written over a horizontal line. The signature is stylized and cursive.