



August 12, 2013

South Dakota One Call Notification Board
c/o South Dakota Public Utilities Commission
500 East Capitol Avenue
Pierre, SD 57501

Re: Complaints OC13-015; OC13-016; OC13-017

Dear Sir/Madam:

CenturyLink hereby responds to the Complaints OC13-015, OC13-016 and OC13-017 filed by NorthWestern Energy Company ("NorthWestern") concerning locate tickets #131960267, 131960200 and 13160278. The Complaint alleges that CenturyLink did not complete these locate tickets in the time frame required by South Dakota Statutes.

CenturyLink admits that the tickets in question were not completed on time. Each of these tickets was to be completed in Mitchell, South Dakota, on the morning of July 17, 2013 by 9:30 a.m. for two of the tickets and by 10:15 a.m. for the remaining ticket. CenturyLink contracts with a vendor, USIC, to perform locate services.

USIC reports that its technician in Mitchell suffered a medical emergency at 7:45 a.m. that required hospitalization. As a result, the employee was not allowed to use his cell phone and was not able to contact anyone at USIC or at NorthWestern. As soon as USIC discovered the situation, it determined whether or not the outstanding Mitchell tickets had been completed, it dispatched a technician from Sioux Falls and had the technician in Mitchell contact all excavators with past due tickets once he was available to do so.

While CenturyLink agrees that these tickets were not completed on time, it disagrees with NorthWestern's assertion that these violations were intentional. Clearly, this incident involves a unique situation. CenturyLink further denies NorthWestern's claim that Ken Schoenfelder was not contacted regarding these trouble tickets.

USIC's records indicate that its technician contacted Ken Schoenfelder at 12:41:00 p.m. and talked with him until 12:42:24 p.m. The technician notes indicate "work will not start until tomorrow morning at 8:00 a.m." The messages generated at 12:45 p.m. on July 17 for two of the tickets and at 2:42 p.m. on Ticket 131960278 appear consistent with USIC's description of these conversations. USIC reports its technician worked the three tickets before 9:00 a.m. the next morning.

CenturyLink has also been aggressively working to address concerns that have arisen with USIC's performance. CenturyLink began using USIC as its locating vendor in March 2013. When issues arose with USIC in May and June, CenturyLink had USIC enter into an action plan that included the following components:

Staffing

- Saturdays were made mandatory working days and remained so until mid July when the backlog of late ticket was relieved.
- USIC transferred four Iowa technicians to South Dakota.
- USIC hired six additional technicians who completed training on 6/26 to add to the staff.
- USIC used locators from Minnesota and Iowa on a daily basis to relieve the late tickets.

Communication

USIC requires daily documented communication with the contactor for any late tickets. This policy will remain in place.

- If a ticket will become late, a phone call prior to the start time is required to the contractor with supporting documentation of when the ticket will be completed.
- Failure to follow this policy will result in progressive disciplinary action.

Upon receipt of this complaint, CenturyLink immediately escalated the issue of USIC's performance and demanded performance improved. USIC has responded by promising to take the following additional steps:

- USIC has committed to add a supervisor in South Dakota – increasing the number of supervisors from one to two. USIC expects a supervisor will allow it to improve its monitoring of any backlog issues and improve communications with the contractors. In addition, the supervisor will provide training and mentoring to newer locators by conducting field training, performing quality audits, and monitoring on time performance. USIC commits that it will fill the position by August 26th.

August 12, 2013

- USIC commits to hold scheduling meetings with any contractor experiencing concerns to create a more effective ongoing partnership to get the work done. CenturyLink intends to attend such meetings.
- USIC commits to use the Ticket Pro late ticket report. This report identifies the late tickets by caller and will allow quick evaluation of the quality of all notes capturing the conversations between the USIC employee and the owner of the ticket. The notes captured are used as documentation of any agreements between USIC and a contractor.
- USIC commits most importantly to open the lines of communication between our field operations with any known contractor that is less than satisfied with the performance of USIC.

CenturyLink will remain vigilant in monitoring USIC's performance. It believes USIC has made progress in addressing problems with its service thus far, but needs to see more effective performance moving forward.

Best regards,

/s/ **Kevin J. Ancell**

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