

ROBERT J. MOORE (5764)  
 Assistant Attorney General  
 STEVEN W. SNARR (3022)  
 Special Assistant Attorney General  
 160 East 300 South, 5th Floor  
 P.O. Box 140857  
 Salt Lake City, Utah 84114-0857  
 Telephone: (801) 366-0158  
 rmoore@agutah.gov  
 stevensnarr@agutah.gov  
*Attorneys for Utah Office of Consumer Services*

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

Investigation of Citizens Telecom Company of Utah d/b/a/ Frontier Communications	)	Docket Nos. 19-041-04 and 19-041-01
Formal Complaint of SRR Partners, LLC d/b/a Sorrel River Ranch Resort & Spa against Frontier Communications	)	Response in Support of Motion to Consolidate

Pursuant to Utah Code § 54-10a-301 and Utah Admin. Code r. 746-1, the Utah Office of Consumer Services (“Office”) files this Response in Support of SRR Partners, LLC d/b/a Sorrel River Ranch Resort & Spa’s (“Sorrel”) August 8, 2019 Status Report and Motion to Consolidate, filed in Docket 19-041-01. (“Motion to Consolidate”). The Office agrees with Sorrel that administrative efficiency would be served by consolidating all proceedings concerning allegations of insufficient landline telephone service provided by Citizens Telecom Company of Utah d/b/a/ Frontier Communications (“Frontier”) in Castle Valley Utah into a single docket. (Motion to Consolidate at pg. 1).

In fact, Jayne May’s Formal Complaint, Docket 19-041-02, and the Division of Public Utilities’ undocketed investigation have previously been consolidated into Docket 19-041-04. *Formal Complaint of SRR Partners, LLC d/b/a Sorrel River Resort & Spa Against Frontier Communications, Formal Complaint of Jayne Dillion May Against Frontier Communications,*

*Investigation of Citizens Telecommunications Company of Utah d/b/a Frontier Communications of Utah*, Docket Nos. 19-041-01, 19-041-02, 19-041-04, Notice of Scheduling Conference, Notice of Consolidation, and Order Denying Motions Made at Hearing in Docket 19-041-01, at 2-3, (May 24, 2019, Utah P.S.C.); *Formal Complaint of Jayne Dillion May Against Frontier Communications, Investigation of Citizens Telecommunications Company of Utah d/b/a Frontier Communications of Utah*, Docket Nos. 19-041-02, 19-041-04, at 1 (July 19, 2019, Utah P.S.C.)

Consolidation of Docket Nos. 19-041-01 and 19-041-04 will allow the parties to coordinate their efforts, prevent duplication of work and ease the administrative burden on the Public Service Commission. Accordingly, the Office supports Sorrel’s Motion and requests that Docket Nos. 19-041-01 and 19-041-04 be consolidated and that “the record from the May 17, 2019 hearing in Docket No. 19-041-01 and all other filings and entries from that docket be included in Docket No. 19-041-04.” Motion to Consolidate at 1.

Respectfully submitted, August 23, 2019.

Robert J. Moore  
Robert J. Moore  
*Attorney for the Office of Consumer Services*