



**FILED WITH  
Executive Secretary**

**October 30, 2013**

**IOWA UTILITIES BOARD**

THOMAS J. MILLER  
ATTORNEY GENERAL

MARK R. SCHULING  
CONSUMER ADVOCATE

## Department of Justice

OFFICE OF CONSUMER ADVOCATE

ADDRESS REPLY TO:  
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October 30, 2013

Ms. Joan Conrad  
Executive Secretary  
Iowa Utilities Board  
1375 Court Avenue, Room 69  
Des Moines, IA 50319-0069

Re: ***Rehabilitation Center of Allison***  
Docket No. FCU-2012-0019

Dear Ms. Conrad:

The Office of Consumer Advocate (OCA) files the direct testimony of the following individuals:

Kathy Miller  
Karen Souhrada  
Kristin Witte, R.N.  
Amy Hylton  
Jerry Tiedt  
Tony Campbell  
Melissa Rewerts-Johnson, L.P.N.  
Lori Sharp, R.N.  
Michael T. Berstler, M.D.

OCA files exhibits to accompany the testimony of Kathy Miller as shown in the attached index.

OCA files as exhibits the data request responses and supplemental responses received from Qwest Corporation d/b/a CenturyLink QC (CenturyLink) as shown in the attached index.

The files designated "confidential" contain information that has been provided to OCA by CenturyLink under a claim of confidentiality. OCA requests that the Board keep the confidentially-marked files confidential for ten days to give CenturyLink an opportunity to seek and obtain a protective order from the Board pursuant to 199 Iowa Admin. Code 1.9. OCA reserves the right to resist such a request.

Ms. Joan Conrad, Executive Secretary  
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In accordance with the rules of the Board, OCA will, with one exception, serve the confidentially-marked files upon the following individuals who, according to counsel for CenturyLink, are authorized to receive confidential information provided by CenturyLink in this proceeding:

Becky Owenson Kilpatrick, Senior Corporate Counsel for CenturyLink  
Kris Holub Tilley, Counsel for Dumont Telephone Company  
Dennis L. Puckett, Counsel for Iowa Network Services, Inc.  
John T. Ward, Counsel for Iowa Network Services, Inc.  
Rod Rummelsburg, General Counsel for AireSpring, Inc.

The exception is confidential OCA Exhibit CL-19Hux, which we received from CenturyLink in response to a data request in Docket No. FCU-2013-0004. We will serve this exhibit on the parties named above upon receipt of authorization from CenturyLink to do so.

If you have any questions, please feel free to contact me. Thank you for your assistance.

Sincerely,

/s/ Craig F. Graziano  
Craig F. Graziano, Attorney

**REHABILITATION CENTER OF ALLISON  
DOCKET NO. FCU-2012-0019  
Office of Consumer Advocate  
Index of Files for OCA Direct Testimony and Exhibits**

OCA Cover Letter and & Index.pdf

**Witness Kathy Miller**

**Direct Testimony:**

Miller Direct Testimony.pdf

**Direct Exhibits:**

Miller Direct Exhibits.pdf, containing the following:

Miller Direct Exhibit KM-1

Miller Direct Exhibit KM-2

Miller Direct Exhibit KM-3

Miller Direct Exhibit KM-4

**Witness Karen Souhrada**

**Direct Testimony:**

Souhrada Direct Testimony.pdf

**Witness Kristin Witte, R.N.**

**Direct Testimony:**

Witte Direct Testimony.pdf

**Witness Amy Hylton**

**Direct Testimony:**

Hylton Direct Testimony.pdf

**Witness Jerry Tiedt**

**Direct Testimony:**

Tiedt Direct Testimony.pdf

**Witness Tony Campbell**

**Direct Testimony:**

Campbell Direct Testimony.pdf

**Witness Melissa Rewerts-Johnson, L.P.N.**

**Direct Testimony:**

Rewerts-Johnson Direct Testimony.pdf

**Witness Lori Sharp, R.N.**

**Direct Testimony:**

Sharp Direct Testimony.pdf

**Witness Michael T. Berstler, M.D.**

**Direct Testimony:**

Berstler Direct Testimony.pdf

**OCA Discovery Response Exhibits<sup>1</sup>**

OCA Discovery Response Exhibits Public.pdf, containing the following

OCA Exhibit CL-1 Public  
OCA Exhibit CL-1S Public  
OCA Exhibit CL-1S2 Public  
OCA Exhibit CL-2 Public  
OCA Exhibit CL-2S  
OCA Exhibit CL-3  
OCA Exhibit CL-3S Public  
OCA Exhibit CL-3S2 Public  
OCA Exhibit CL-4  
OCA Exhibit CL-5 Public  
OCA Exhibit CL-5S Public  
OCA Exhibit CL-5S2  
OCA Exhibit CL-6 Public  
OCA Exhibit CL-6S Public  
OCA Exhibit CL-7 Public  
OCA Exhibit CL-7S Public  
OCA Exhibit CL-8 Public  
OCA Exhibit CL-8S Public  
OCA Exhibit CL-9 Public  
OCA Exhibit CL-9S Public  
OCA Exhibit CL-10 Public  
OCA Exhibit CL-11 Public

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<sup>1</sup>Linked documents are omitted from OCA Exhibits CL-3S, CL-18S and CL-19S2 and in part from OCA Exhibit CL-13. Only the first linked document is included in OCA Exhibit CL-19S. OCA Exhibits CL-18 and CL-19S include only selected pages from the linked documents. OCA Exhibits CL-18Hux, CL-19Hux (public and confidential) and CL-22Hux are discovery responses from CenturyLink in Docket No. FCU-2013-0004, *Huxley Family Physicians*.

OCA Exhibit CL-12  
OCA Exhibit CL-12S  
OCA Exhibit CL-13 Public  
OCA Exhibit CL-13S Public  
OCA Exhibit CL-14  
OCA Exhibit CL-15  
OCA Exhibit CL-16  
OCA Exhibit CL-17  
OCA Exhibit CL-18 Public  
OCA Exhibit CL-18S Public  
OCA Exhibit CL-18S2 Public  
OCA Exhibit CL-19 Public  
OCA Exhibit CL-19S Public  
OCA Exhibit CL-19S2 Public  
OCA Exhibit CL-20 Public  
OCA Exhibit CL-21 Public  
OCA Exhibit CL-22  
OCA Exhibit CL-23  
OCA Exhibit CL-23S Public  
OCA Exhibit CL-24  
OCA Exhibit CL-27 Public  
OCA Exhibit CL-27S Public  
OCA Exhibit CL-29 Public  
OCA Exhibit CL-32 Public  
OCA Exhibit CL-33 Public  
OCA Exhibit CL-35  
OCA Exhibit CL-36  
OCA Exhibit CL-37 Public  
OCA Exhibit CL-38  
OCA Exhibit CL-18Hux  
OCA Exhibit CL-19Hux Public  
OCA Exhibit CL-22Hux

OCA Discovery Response Exhibits Confidential.pdf, containing the following:

OCA Exhibit CL-1 Confidential  
OCA Exhibit CL-1S Confidential  
OCA Exhibit CL-1S2 Confidential  
OCA Exhibit CL-2 Confidential  
OCA Exhibit CL-2S  
OCA Exhibit CL-3  
OCA Exhibit CL-3S Confidential  
OCA Exhibit CL-3S2 Confidential  
OCA Exhibit CL-4  
OCA Exhibit CL-5 Confidential  
OCA Exhibit CL-5S Confidential

OCA Exhibit CL-5S2  
OCA Exhibit CL-6 Confidential  
OCA Exhibit CL-6S Confidential  
OCA Exhibit CL-7 Confidential  
OCA Exhibit CL-7S Confidential  
OCA Exhibit CL-8 Confidential  
OCA Exhibit CL-8S Confidential  
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OCA Exhibit CL-10 Confidential  
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OCA Exhibit CL-12S  
OCA Exhibit CL-13 Confidential  
OCA Exhibit CL-13S Confidential  
OCA Exhibit CL-14  
OCA Exhibit CL-15  
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OCA Exhibit CL-17  
OCA Exhibit CL-18 Confidential  
OCA Exhibit CL-18S Confidential  
OCA Exhibit CL-18S2 Confidential  
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OCA Exhibit CL-19Hux Confidential  
OCA Exhibit CL-22Hux