

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Formal Complaint)	Docket 06-035-148
Of Tim Vetere Against Rocky Mountain)	Tim Vetere's
Power)	2nd Set of Data Requests to
)	Rocky Mountain Power
)	April 25, 2007

**Please send an electronic copy
And a paper copy of your Data
Response to:**

**Dennis Miller – Legal Assistant
Division of Public Utilities
Heber M. Wells Bldg – 4th Flr
160 E 300 S – Box 146751
Salt Lake City, UT 84114-6751**

QUESTIONS RECEIVED FROM TIM VETERE

1. How come I have low voltage?

Response 1:

In response to a report from Mr. Vetere that his pumps were not operating, Rocky Mountain Power made a “trouble call” to Mr. Vetere’s site on April 17, 2007. Upon arriving at the site, it was determined that Mr. Vetere’s pumps were operating and that the voltage was 469 volts. This voltage level is within the American National Standard (ANSI) for Electrical Power Systems and Equipment-Voltage Ratings, ANSDI C84-1-1995 (R2001), as described in Rocky Mountain Power’s response to the Vetere formal complaint dated December 21, 2006. In accordance with ANSI standards and Commission rule, the voltage supplied Mr. Vetere is within normal ranges.

2. Produce a copy of my contract.

Response 2:

Mr. Vetere’s contract expired in April 2004 and Rocky Mountain Power does not have a copy of this contract.

3. How come both banks worked fine and now I have voltage problems?

Response 3:

Please refer to Response 1.

4. What are you going to do about the voltage problem and when.

Response 4:

While Rocky Mountain Power has been unable to identify a “voltage problem,” the Company did agree to install a regulator bank on the Green River 12 feeder in an attempt to resolve this complaint. The regulator bank is scheduled to be operational by May 4, 2007.

5. You know this is a voltage problem and why aren't you fixing it. This is you only product and you are damaging my equipment.

Response 5:

Please refer to Response 4.

6. I have been told by RMP that I could not hook on any power and they let over 400 hp hook on in front of me. Power is like water in a pipe. Who ever turned on in front of you gets the water and if there is no more capacity in the line you don't get your volts enough if you for it.

Response 6:

According to Rocky Mountain Power’s records, only 109 hp of new load has been connected to the lines between the substation and Mr. Vetere’s site since 1998. Rocky Mountain Power’s records also indicate that Mr. Vetere’s load is the single largest connected load on the Green River 12 feeder, using over 200 hp of capacity. Please refer to Rocky Mountain Power’s Response 1.2 to Mr. Vetere’s First Set of Data Requests dated March 20, 2007.

7. If my contract reads 480, 3 phase load I would like to get 480 volts on a constant level.

Response 7:

Voltage is delivered within ranges established by ANSI standards which were outlined in Rocky Mountain Power's response to the Vetere complaint dated December 21, 2006. Steady state voltage cannot be provided as there are continual fluctuations in the power system that make steady state voltage delivery not practical. This is the reason that a range of acceptable voltage levels is incorporated within ANSI standards and Commission rule.

8. Question 1.1 should have read the sizes of wire from the substation to Veteres pump and the amps that each size can carry, in order from the substation to Veteres pump.

Response 8:

The wires serving Mr. Vetere's loads are sized adequately to provide service within established guidelines.

9. Questions 1.3 The reason the line on the west side of the river won't handle the load the power company has sold. Has the power company over sold the load that the old line can handle. Some of this line was put in in the 1940s.

Response 9:

Please refer to Response 6.

10. Question 1.5 Who did they interview in Green River?

Response 10:

Operations Manager John Cordova spoke to his direct reports regarding Mr. Vetere's statement that Rocky Mountain Power employees have told "people right here in town that there was no power." As stated in Response 1.5, Mr. Cordova has been unable to validate that any Rocky Mountain Power employees in his area have made such a statement. The names of the employees that Mr. Cordova spoke to regarding this statement are shown below:

Gary Lawley
Brent Pearson

Brad Fail
Mike Kemp
Taj Skidmore

11. Question 1.9 I asked RMP to hook on 20 hp and I was told that I could not hook on even 20 hp by Greg Beam. I might have to call and get a deposition by an old RMP employ Mike Hayes.

Response 11:

Greg Bean denies advising Mr. Vetere he could not connect 20 hp of load to the existing system. In 2006, Mr. Vetere was advised that he could add a 30 hp pump and pivot as long as he put in a soft start motor to accommodate this new load. This fact was outlined in Rocky Mountain Power's response to Mr. Vetere's formal complaint dated December 21, 2006. Over the years Mr. Vetere has requested 800 hp, 1,000 hp, 10,000 to 20,000 hp, 700 hp and more recently 1,500 hp of additional capacity. These requests for additional capacity cannot be accommodated without upgrading the existing circuit under the line extension provisions of Rocky Mountain Power's Regulation No. 12. Mr. Bean, as well as other Rocky Mountain Power employees, have advised Mr. Vetere of this fact. Mr. Vetere has declined to enter in to a line extension agreement for the additional capacity he is seeking.

12. RMP needs to tell the court because there are people who have put bigger systems in and this will also show the court that they have over sold this line.

Response 12:

Please refer to Response 6.

13. On the 7th of February 2007 when we had the meeting with RMP and the Public Service, Greg Beam said to me that I should be able to put more pumps on, he said he would let me know. 7 to 10 days later I called RMP 3 different times and I have still not heard from them either a yes or a no and it is April 23, 2007. My pump keeps shutting off because of low voltage. I called Hon Cordova in Moab and told him I am not putting up with this, he had Brad Fail a RMP employee come out to my pump site to confirm that what I was saying was true. Then I called John again and he said they were

going to put up voltage regulator banks, but he didn't know if this was going to help. They would just have to wait and see after they got them installed.

Response 13:

Rocky Mountain Power has received multiple requests for significant amounts of additional capacity from Mr. Vetere. Subsequent to the technical conference held on February 7, 2007, the Company received two requests from the Vetere to provide an additional 700 hp of capacity. Mr. Vetere has been advised on several occasions that he will need to enter into a line extension contract in order to supply this significant additional capacity. Mr. Vetere was asked to put his request for additional capacity in writing.

In response to the Company's request that any additional capacity requests be put in writing, Mr. Vetere submitted to Rocky Mountain Power the attached commercial/industrial customer information load sheet dated March 28, 2007 requesting up to an additional 1,500 hp of additional capacity. In order to understand exactly what Mr. Vetere was requesting in terms of additional capacity, Operations Manager John Cordova contacted Mr. Vetere for clarification. Mr. Vetere indicated to Mr. Cordova that he wanted 700 hp of additional capacity to get his farm off diesel pumps. Mr. Cordova reminded Mr. Vetere that this would only be possible with a line extension, as has previously been explained on several occasions since there is no other growth in the area of any significance that would justify the Company to fund the capacity being requested by Mr. Vetere. Mr. Vetere declined to enter into a line extension agreement for the additional 700 hp of additional capacity. Mr. Vetere then stated he would like to install an additional 75 to 100 hp pump at the current location of his 200 hp pumps. The cost of upgrading the transformers to accommodate an additional 100 hp load is \$9,847. Mr. Vetere's line extension allowance for this work is \$28,825, thus Mr. Vetere would pay no up front costs. However, there would be a monthly facilities charge associated with this upgrade in the amount of \$123.09 per month for five years. The additional 100 hp pump would need to have its starting current limited to 340 amps at 460 volts.

With regard to the voltage issue, Brad Fail denies telling Mr. Vetere that his voltage was too low. The voltage reading taken by Mr. Fail on April 17, 2007 was 469 volts, which is within ANSI ranges as discussed above. Mr. Fail indicates that Mr. Vetere's pumps were running when he arrived and running when he left.

The power company didn't address all the new hookups on this line or people up grading to bigger motors. This is a big factor as to why I can't get power and volts today.

Response to general statement:

Rocky Mountain Power did address the new loads that have been added to the Green River 12 feeder in Response 1.2 to Mr. Vetere's First Set of Data Requests dated March 20, 2007. Rocky Mountain Power has also addressed the voltage issue on numerous occasions and there is no evidence to support Mr. Vetere's claims that voltage levels are outside of ANSI standards. Finally, Mr. Vetere will need to enter into a line extension agreement in order to receive the significant amounts of additional capacity he has been requesting, i.e. 700 hp of additional capacity. This has been explained to Mr. Vetere many times. Mr. Vetere has refused to enter into a line extension agreement.

Attachment