

June 3, 2007

Public Service Commission
Heber M. Wells State Office Building
160 E. 300 S. - 4thFloor
Box 45585
Salt Lake City, UT 84145

Subject Docket # 07-035-08
Request For Information and Discovery

Until a complaint is referred to the Supreme Court, there is no mechanism to recover legal costs and other expenses. Since the area residents are not on either the public or power company's payroll, we wish to minimize our legal expenses. We are asking the PSC to request the following discovery. This discovery will allow the PSC to determine the merits of our complaint. The information will either validate or disconfirm the complaint and allow the PSC to rule. If this request for discovery must be filed by our attorney, the PSC needs to advise us of such. Please inform us as soon as possible.

The following information is necessary for the PSC to rule on this complaint, determining if there are safety and reliability problems with Rocky Mountain Power's overhead distribution lines. The information will allow the PSC to determine if cutbacks in maintenance and the number of journeyman linemen since the 1990's are causing problems with safety and reliability. The data is to be limited only to the State of Utah for overhead distribution lines only. Distribution lines are defined as power lines and cables operating at 2.4 kV and higher, but less than 40 kV. This information should be available from the FERC. required accounting. While this information would be State wide, it would accurately reflect the condition of lines in the East Millcreek area and are very relevant to this complaint.

1. Money spent on maintenance (not to include outage restoration) per year for each year since 1 995.
2. Money spent on outage restoration (not to include maintenance) per year for each year since 1995.
3. The total amount of money included in the rates collected each year for maintenance excluding all outage restoration cost.
4. The total amount of money included in the rates collected each year for outage restoration excluding all scheduled maintenance costs.
5. Total number of total outages per year for each year since 1995.
6. Total number of total outages over 5 minutes per year for each year since 1995.

7. Total outage time per year for each year since 1995.
8. Total number of outages given major event status per year for each year, per year since 1990.
9. The minimum number of journeyman linemen employee on the power company payroll per year for each year since 1995.
10. The number of overtime hours paid to journeymen linemen employed by the power company per year for each year since 1995.
11. The total number of residential customers served at the end of each year per year since 1995.

In preparing for the June 14th Technical Conference it is essential that we have in writing the position of the Division of Public Utilities and a copy of the Williams Consulting Inc. responses to the May 1st Technical Conference. We have been waiting for a the Division of Public Utilities to forward a copy of their position and the Williams Consulting Report. They requested that they be allowed to delay their response to the PSC until after the May 1, 2007, Technical Conference. It has now been 30 days and we have received no response. This information is required before the hearing can proceed. We believe that since Williams Consulting Inc. was included in the last meeting we should be able to ask for their response as part of the Division's response.

We ask for time to have all responses reviewed by both legal counsels and our technical consultants. Since time will be required to prepare the discovery and for the Division to respond, we believe the hearing needs to be rescheduled for June 28 or 29. If we do not get a timely response, we would reschedule for after July 20.

If the data asked for is not forth coming we will have no other option than to ask for a full hearing before the Public Service Commission. Without this information any Technical Conferences serves no purpose!

Most sincerely,

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Docket # 07-035-08

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