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Utah Public Service Commission
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, Utah 84114

Re: Rocky Mountain Power Rate Application
Docket 13-035-184

Dear Commissioners:

The undersigned is one of the attorneys representing hundreds of victims of the Wood Hollow fire that ravaged large swaths of Sanpete and Utah counties. The Wood Hollow Fire started on June 23, 2012, and burned for a number of days destroying homes, watershed, grazing lands, personal property and causing substantial losses on approximately 47,000 acres of land due to faulty design, maintenance and operation of transmission lines and facilities owned and operated by Rocky Mountain Power.

After the smoke had dissipated and ash of the Wood Hollow fire had settled, the cause and origin of the Wood Hollow fire was thoroughly investigated by the Utah State Fire Marshall. The conclusion of the State Fire Marshall was that an electrical arc jumped between two intersecting high voltage transmission lines owned and operated by Rocky Mountain Power. That electrical arc ignited combustible material on the ground and the Wood Hollow fire quickly spread beyond control.

The victims of the Wood Hollow fire have filed a lawsuit in the Sixth District Court in Sanpete County against Rocky Mountain Power seeking compensatory and punitive damages. The lawsuit contends that Rocky Mountain Power failed to follow industry standards and Public Service Commission ("PSC" or "the Commission" hereinafter) rules and regulations in designing, inspecting, maintaining, and operating the two high voltage intersecting transmission lines that arced and started the fire. The victims of the Wood Hollow fire contend that the arcing on June 23, 2012, was not the first time that arcing had occurred at the point of the origin of the fire, and that RMP knew or should have known that an unsafe and hazardous condition existed. If RMP knew or should have known of the unsafe and hazardous condition, it was obligated under the Commission's rules, its certificate of service, and the provisions of the

National Electric Safety Code to immediately remedy this patent violation. Had Rocky Mountain Power done so, the Wood Hollow fire would not have occurred.

Buried in the thousands of pages of documents and testimony filed under this docket and in conjunction with the instant Rate Application is an attempt by Rocky Mountain Power to “pass through” the costs associated with the Wood Hollow fire to its rate payers in the State of Utah. Rocky Mountain Power’s failure to directly focus the Commission and the public on the facts relating to the cause and origin of the fire raises serious questions and concerns regarding the transparency of the regulatory proceedings. This failure undermines public confidence in the process.

Equally of concern is the notion that a corporation, or any business entity, should attempt to “pass through” costs and expenses which are due to negligent conduct, and which may rise to the level of conscious disregard of community safety and security. Before this Commission makes a determination regarding an application by Rocky Mountain Power to pass its costs and expenses associated with the Wood Hollow Fire to Utah ratepayers, the Commission should determine whether Rocky Mountain Power’s conduct was such that it should not be permitted to do so.

Respectfully submitted,

LAW OFFICES OF ROBERT W. JACKSON, APC

/s/ Robert W. Jackson

Robert W. Jackson