SCOTT H SWEAT, #6143 Wasatch County Attorney TYLER J. BERG, #12031 Deputy Wasatch County Attorney

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BEFORE THE UTAH UTILITY FACILITY REVIEW BOARD

In the Matter of Rocky Mountain Power's Petition for Review to the Utah Utility Facility Review Board

DOCKET NO. 16-035-09

REQUEST FOR FORMAL **PROCEEDINGS**

COMES NOW, Wasatch County, by and through Deputy Wasatch County Attorney Tyler J. Berg, requests the Utility Facility Review Board order the current matter be conducted as a formal proceeding under U.C.A. § 63G-4-205 to allow for formal discovery.

Wasatch County has made multiple requests both orally and via email for information from Rocky Mountain Power regarding a contract with the Promontory development in Summit County but has never received a copy of the contract. This contract is vital in this matter because it moves a current easement that has been in existence for many decades. The current easement allows for Rocky Mountain Power to provide safe, reliable, adequate, and efficient service to its customers in Summit and Wasatch Counties. Wasatch County may request additional discovery.

DATED this 16th day of March 2016.

/s/ Tyler J. Berg_ TYLER J BERG Deputy Wasatch County Attorney

CERTIFICATE OF SERVICE

I CERTIFY that on March 16, 2016, a true and correct copy of the foregoing was served upon the following as indicated below:

By Electronic-Mail:

Beth Holbrook (bholbrookinc@gmail.com) Utah League of Cities and Towns

Data Request Response Center (datarequest@pacificorp.com) PacifiCorp

Robert C. Lively (bob.lively@pacificorp.com) Yvonne Hogle (yvonne.hogle@pacifcorp.com) Daniel Solander (daniel.solander@pacificorp.com) Rocky Mountain Power

D. Matthew Moscon (matt.moscon@stoel.com) Richard R. Hall (richard.hall@stoel.com) Stoel Rives LLP

Patricia Schmid (pschmid@utah.gov) Justin Jetter (jjetter@utah.gov) Rex Olsen (rolsen@utah.gov) Robert Moore (rmoore@utah.gov) Assistant Utah Attorneys General

Jeremy C. Reutzel (jreutzel@btjd.com) Bennett Tueller Johnson & Deere

By USPS:

Division of Public Utilities 160 East 300 South, 4th Floor Salt Lake City, Utah 84111

Office of Consumer Services 160 East 300 South, 2nd Floor Salt Lake City, Utah 84111

/s/ JoEll Rowley	I