MICHAEL R. CARLSTON (0577) ANDREW L. ROTH (16149) SNOW CHRISTENSEN & MARTINEAU 10 Exchange Place, Eleventh Floor Post Office Box 45000 Salt Lake City, Utah 84145-5000 Telephone: (801) 521-9000 Facsimile: (801) 363-0400 Email: <u>mrc@scmlaw.com</u> Email: <u>alr@scmlaw.com</u>

Attorney for Respondent Empire Electric Association, Inc.

In the Matter of	DOCKET NO. 19-025-01
JOSEPH ANTHONY MUSUMECI,	
Complainant,	EMPIRE ELECTRIC ASSOCIATION, INC.'S RESPONSE TO COMPLAINANT'S
VS.	REQUEST FOR REHEARING/APPEAL
EMPIRE ELECTRIC ASSOCIATION, INC.,	
Respondent.	

#### BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

Pursuant to Utah Code § 63G-4-301(2)(a), Respondent Empire Electric Association, Inc. hereby provides its response to Complainant Joseph Anthony Musumeci's request for appeal and/or rehearing, sent via email to the Public Service Commission (the "Commission") on July 18, 2019.

### **RESPONSE**

Respondent opposes Complainant's request for appeal and/or rehearing. Complainant has not identified any legal or factual grounds for an appeal or rehearing, as required by statute. *See* Utah Code § 63G-4-301(1)(b)(ii). Thus, Complainant has not provided any substantive basis for

reconsideration. Accordingly, Respondent requests that Complainant's request be denied and that the Commission's decision stand.

DATED this 1<sup>st</sup> day of August, 2019.

Respectfully submitted,

SNOW CHRISTENSEN & MARTINEAU

/s/ Andrew L. Roth\_\_\_\_\_

Michael R. Carlston Andrew L. Roth *Attorneys for Empire Electric Association* 

# **CERTIFICATE OF SERVICE**

Docket No. 19-025-01

I hereby certify that on August 1, 2019, a true and correct copy of the foregoing was served

by electronic mail to the following:

### Complainant:

Joseph Anthony Musucmeci

musumeci7825@comcast.net

## **Division of Public Utilities:**

Cynthia Dumas

Erika Tedder

cdumas@utah.gov

etedder@utah.gov

<u>/s/ Andrew L. Roth</u> 4848-1353-2062, v. 1