

**FORMAL COMPLAINT FORM
PUBLIC SERVICE COMMISSION
Heber M. Wells State Office Building
160 East 300 South, Fourth Floor
P.O. Box 45585
Salt Lake City, Utah 84114**

Complaints are public documents and are maintained on the Public Service Commission website. Further information on formal complaints is available at: <https://psc.utah.gov/complaint-process/>

1. Name of Complainant: Symphony Homes

Address: 111 S Frontage Rd, Centerville Utah 84014

Telephone No.: 801-298-8555

Email Address: jschmidt@symphonyhomes.com

Preferred method of contact: Email or U.S. Mail

If represented by counsel, list:

Name: Kevin Anderson (Anderson Call & Wilkinson)

Address: 110 South Regent Street, Suite 200, SLC UT 84111

Telephone No.: 801-554-4430 Email Address: _____

2. The utility being complained against is: Dominion Energy

3. What did the utility do which you (the Complainant) think is illegal, unjust, or improper?
Include exact dates, times, locations and persons involved, as closely as you can.

After Symphony signed a contract with Dominion Energy (Provided by Kurtis Federicks and Chris Balling on March 9th 2020, one year ago) to move a Gas main by or before July 31st 2020 and paid Dominion \$22,352.00, the work was not completed. As the date approached and we reached out to Dominion about the work not being started and we were told on June 25th 2020 it would be delayed because of Covid 19. Since then Dominion has refused to give us any more information on the project other than that it is not currently on their schedules to complete the work.

4. Why do you (the Complainant) think these activities are illegal, unjust or improper?

Based on the contract Symphony had with Dominion they represented to their buyers that this gas line in their back yards was to be abandoned, this now puts Symphony in a compromised situation with their clients. Symphony first entered into the contract with Dominion because they were told that the fence they were building would be unsafe over top the gas line. When Dominion missed their deadline they gave Symphony permission to complete the fence over the line but now that the contracted work to move the line has still not been completed Symphony is very concerned about the safety of residents in the area. We feel we have a responsibility to our home buyers to provide what we represented to them with the relocation of the line from their back yards and more importantly insure their safety through the completion of this contracted work.

5. What relief does the Complainant request?

We would like an addendum to our contract signed by Dominion Energy stating that the work will be done before July 31st 2021 and that any cost increases, property damage or issues of any kind that arise because of the gas line's location between July 31st 2020 and the completion of the work will be fully assumed by Dominion energy. We would also like to have stronger wording in the agreement toward Dominions obligation to honor the completion date so that they can not simply ignore it.

6. Signature of Complainant 

Date: 3/12/21

NOTE: Submit complaint by email or U.S. mail. (<https://psc.utah.gov/psc-filing-requirements/>)