

Dammeron Valley Water Works

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January 19, 2006

Steven Goodwill
Administrative Law Judge
Public Service Commission
160 East 300 South
Salt Lake City, UT 84111

Re: Dammeron Valley Water Works vs Utah Power & Light

Dear Judge Goodwill;

I am filing the list of claims with you. I have made the decision to not have our company incur any more costs than we already have. Therefore we are not going to retain a lawyer. A lawyer, while a good opponent to David Elmont, would just be a larger financial burden on our company and cause this hearing to go on a lot longer than necessary. I hope you will excuse my amateur attempt at this filing, but it is the road we have chosen to take.

I am wondering why I am required to lay out my claim and resolution. Utah Power does not have to submit their resolution or response to my original claims. You will give them a copy of my claim and they will have five weeks to research their defense. They have had almost three years to review our claims and demands, and they have spent most of that time trying to put the blame on us. Why are the requirements not the same for both of us?

I talked with Julie Orchard today, and the following is my interpretation of the conversation we had.

In Attachment "A" I will outline the actual costs for damages to Dammeron Valley Water Works, for what we consider to be inconsistent power. I will break these costs down and show what we consider to be:

- 1) Repair costs due to power problems
- 2) Equipment improvements necessary to protect ourselves
- 3) Hearing and work meeting travel costs
- 4) Ineffective additions requested by Utah Power's Consultant
- 5) New equipment we found necessary to be able to monitor the power on our own.

In Attachment "B" I will list my concerns.

In Attachment "C" I will list what I believe to be the resolutions to the problems.

DVWW vs UP&L Attachment "A"

Inventory

We currently have one 30 hp submersible motor, one 40 hp submersible motor and one 60 hp submersible motor. Prior to Feb 02 we had two 30 hp motors. In Spring 04 we installed one 60 hp motor.

Costs to our Company

Feb 02 outage:		
Southwest Invoice 10827		\$ 8,400.00
Replace 30 hp motor (burned up) with 40hp motor		
Southwest Invoice 10828		531.50
Telemetry radio outage		
Apr 02		
Southwest Invoice 11282		4,934.90
Replace 40 hp motor (2 months old)		
Apr 02		
Southwest Invoice 11281		893.75
Repair burnt wiring on telemetry repair		
May 02		
Southwest Invoice 11288		1,627.25
Replace electrical cable for 30hp motor		
Sep 02		
Southwest Invoice 11747		986.45
Repair Telemetry panel		
Sep 03		
Southwest Invoice 13330		6,702.25
Replace 40 hp motor, replace damaged		
Soft Start with new bigger Soft Start		
Oct 03		
Southwest Invoice 13280		826.00
Repair telemetry power source, 30hp pump		
Winding is open		
Feb 05		
Southwest Invoice 14003		16,490.80
Utah Power related service calls, including		
U P & L consultant suggested improvements		
May 05		
Southwest Invoice 15961		5,352.06
Replace 40 hp motor-ended up being manufacturer		
Defect		-5,352.06

Feb 02 thru Apr 05 \$ 6,126.00
John Thorpe on site for repair work on wells manually turning wells on and off, troubleshooting wells, resetting wells that have tripped off, working on improvements suggested by UP & L consultant

Jun 05 Remote Control Systems Inc. 26,000.00
Installed new SCADA telemetry on our system. This includes a sensor to monitor the power on all three legs coming into our well house. While it would not be Utah Power's responsibility to pay for our new telemetry system, the power sensor could not work without the SCADA RTU packs.

Feb 02 thru Feb 06
Carol Thorpe
The time required to deal with this issue is hard to state. To get Utah Power to listen to me took months and the Public Service Commission's authority. Preparing for hearings, collecting all of the data, deal with well motor operational problems, etc. was also time consuming. All the time spent on these hearings pushed my regular job to overtime. I am not sure how to put a number to this. Assuming I put 20 hours per month into this since Feb 02 thru now it would exceed 720 hours. If you calculate 720 hours @ \$25.00 per hour it would result in \$18,000 in compensation.

Hearings:

The hearings break down as follows:

August 5, 2003 – Ross Gregorson	1050.00
Carol Thorpe	600.00
John Thorpe	253.00

We traveled 4 ½ hours each way, the hearing lasted just under two hours this made an 11 hour day for all three of us. (Time, mileage & food)

Dec 22, 2003 – Ross Gregorson	1467.00
Carol Thorpe	632.00
John Thorpe	495.00

We flew this time, snowed in for 7 hours, includes time, food, parking and rental car.

Feb 9, 2004 – Ross Gregorson	200.00
Carol Thorpe	75.00
John Thorpe	69.00

Held in St. George.

Attachment "A"

DVWW vs UP&L Attachment "B"

My concerns with this series of events involving Utah Power are quite large. We have had to deal with a lot of very stressful events relating to our power service. We are a small water company, currently serving 425 lots, which equates to approximately 850 people living in the valley. When we have issues with the power it inhibits our ability to supply water to these people. The size of our valley also makes it very difficult to absorb the ridiculous amount of money these power problems have cost us.

I think my largest concern is inconsistent power. We do not fault Utah Power for lightning strikes, fires or natural disasters. We do fault them for their lack of quality power. The power issues do not only affect me, it affects all of the residents of Dammeron Valley.

An additional concern is the large amount of money that our small system has had to pay out and the large strain that it puts on our small company.

DVWW vs UP&L Attachment "C"

Many things in Dammeron Valley have changed since February 2002. Our population has grown by approximately 40% in the past eighteen months. This growth has forced us to add another well and more water storage. I would assume that since we have had to make improvements on our system, Utah Power would have had to make them as well.

Utah Power has made some improvements to our lines in the past three years that they will admit to, but there are also improvements that they will not claim. Between the improvements made by both parties, the problems have decreased. Due to damage done from inconsistent power, we have put forth a large amount of money in repairs and would like to be compensated. I would like the Public Service Commission to help keep Utah Power responsible for the quality of power they put out instead of hiding behind the tariff protection. There needs to be accountability for the product they put out and are paid for. When a customer is paying for a service, they deserve to have quality. If I had problems with the quality of water I was putting out, there would be repercussions.

Another resolution that is imperative is cooperation between DVWW and Utah Power. This is necessary when power is insufficient at maintaining a certain standard for our well motors. Dammeron Valley has purchased a generator to be used when power quality is poor and notification of power problems is of the utmost importance.

