

- BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH -

In the Matter of the Formal Complaint
of Kelly Margetts
Petitioner

Docket #'s: 15-035-19 & 15-049-04

Motion for Paper Correspondence

Motion to Potentially Include per
Clarification/Motion to Stay
(180 Days)

Motion of Discovery of Whom paid
for Commercial work to
be done and then Whom actually
"requested" such work per
SLC Corp.

Motion of Discovery of Transportation
Permit Authorizing Road closure

Motion to Deny Dismissal

Motion for Summary Judgment

Vs.

Rocky Mountain Power and
Century Link
Respondent

Petitioner now comes before the Public Service Commission of Utah in response to Docket #'s 15-035-19 & 15-049-04 in regards to a Formal Complaint against Rocky Mountain Power Company and Century Link.

Motion for Paper Correspondence: Petitioner asserts that Petitioner does not have immediate Internet computer access and it creates an undue hardship upon Petitioner to immediately be purvey of any and all memorandums facts, findings, decisions, orders etc... in regards to this particular matter.

***NOTE:** Petitioner asserts that Petitioner was NOT able per Petitioners self nor via assistance of SLC Corp. employee to access Docket#: 15-049-04.

Therefore Petitioner Motions for Paper Correspondence.

Motion to Potentially Include per Clarification/Motion to Stay (180 days):

Petitioner asserts that (per worker installing tubes upon SLC property) that Century Link is involved in this matter as that (per worker) phone companies fiber optic Commercial equipment is involved in this matter {per - is fiber optic equipment included or will be included but not limited to future usage within tubes in regards to providing end user at tube points Century Link service?}; meaning it is to soon to be certain per work is in an incomplete process. It would need to be clarified as to if Century Links equipment is to be used or will be used at some point in time, to provide service connection to any immediate entity located within connection area via the tube infrastructure, or at any point of the infrastructure of the tube, but not limited to once attached to the service point {where tubes are connected to} located at power line/telephone pole located approximately on the north south direction of the street named Grace Court.

Therefore Petitioner Motions to Include Century Link in this matter/pending Clarification.

Motion of Discovery of Whom paid for Commercial work to be done and then Whom actually "requested" such work per SLC Corp.

Petitioner asserts that due to correspondence with a SLC Corp. individual named by Eric Holje of Rocky Mountain Power that correspondence on behalf of SLC Corp. to Rocky Mountain Power was nothing more than to make sure that there would be no public right of way conflicts with SLC Corps. governorship and "NO" such request for work to be done was ever made by SLC Corp.

Therefore Petitioner Motions for Prudent Discovery.

Motion of Discovery of Transportation Permit Authorizing Road closure:

Petitioner asserts that there was "NOT" a Transportation Permit in regards to this Commercial matter, which was NOT a matter of "Emergency".

Therefore Petitioner Motions for Discovery of Transportation Permit.

Motion to Deny Dismissal: Petitioner asserts that during this particular matter that Petitioner needed to legally, lawfully and in regards to liability have unrestricted "IN and most specifically OUT" access of Petitioner's property in regards to being able to USE a vehicle(s) via a public street in conjunction with being able to USE with Petitioners Public Utilities to do that which Petitioner needed to do but not limited to complete or engage in completing from the time period of January 15th, 2015 to February 3rd, 2015.

Petitioner asserts that Petitioner was never informed that there would be a public road closure or that work was to be performed during this time of January 15th, to February 3rd, 2015 and that due to legal ramifications upon Petitioner that Petitioner was not available to drive per those legal ramifications to drive through the private property route, which was clearly mandated per signage via Rocky Mountain Power.

Petitioner asserts the SLC Corporations Mayors office suggested to call the Public Service Commission of Utah.

Petitioner is duly aware that the Public Utility Commission has no jurisprudence in regards to compensation for loss of property use per his numerous {2} phone calls.

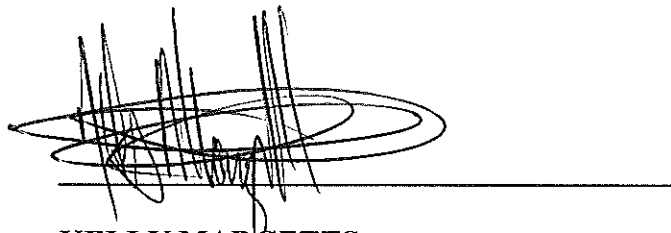
Therefore Petitioner Motions to Deny Dismissal due to the fact that this case is a Denial of USE of Public Utilities complaint.

Motion for Summary Judgment: Petitioner humbly Motions for a Summary Judgment in Petitioners favor vs. Rocky Mountain Power and pending per (180 days) or disclosure vs. Century Link; due to the fact that Rocky Mountain Power and potentially Century Link acted inappropriately in regards to this Commercial matter as Public Utilities entities, by which in doing so immediately caused Petitioner's inability to USE as Petitioner may, want, will, and or desire Petitioner's Public Utilities which is prohibited by the Public Service Commission of Utah.

CERTIFICATE OF SERVICE

It is hereby certified that on this 27th day of March, 2015, a true and genuine copy of the foregoing was sent via the United States mail system or hand delivered to the concerned listed below:

Division of Public Utilities
160 East 300 South, 4th Floor
SLC, Utah 84111

A handwritten signature in black ink, consisting of several vertical strokes and a large, loopy flourish that extends to the left and loops back under the main body of the signature. The signature is written over a horizontal line.

**KELLY MARGETTS
PETITIONER
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801-323-9169**