

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

Date: March 12, 2019

Applicant: Community Advocacy for Safety and Public Rights (CASPR LLC)

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Phone number: [REDACTED] – Prior to posting as a public document – we would ask that personal information such as phone numbers be omitted from public view.

In accordance to Section R746-3(A), (B), (C) & (F) we, the members of CASPR LLC wish to file a formal complaint against Rocky Mountain Power.

Several residents attended the public open house held by Rocky Mountain Power (RMP) on July 16th, 2018 where we learned that the a “new” 138kV line would require a 60-foot easement due to “safety”. We have asked repeatedly RMP to further explain the standards that they state they build their lines in accordance to and they have provided some of the NESC codes, however, not detailing **why** a 60-foot easement is created, nor **what** is this easement keeping people safe from?

- 1) Why is a 60-foot easement needed?
- 2) What are all the risks the 60-foot easement is keeping people safe from?
- 3) How could RMP possibly mitigate safety concerns by building this line with homes inside this 60-foot easement?
- 4) What were the standards that RMP states they adhered to for building lines near schools? (See video link https://youtu.be/u_b9v80OxJM starting at time stamp 32:16).
- 5) How can this plan be considered safe when children can easily play under these lines?
- 6) How could this plan be considered safe when there are two metal backstops located within the safety easement?
- 7) How could this plan be considered safe when there are swimming pools in plain sight, in an enlarged easement?
- 8) How can this project be considered safe when the EMF readings would exceed World Health Organization’s standard, impacting homes, schools, and children within 230’ of the line?
- 9) How can this project be considered safe when it runs in close proximity to the Assisted Care Center on 11400 South?
- 10) How can the installation of this line be considered safe considering RMP’s own documentation stating: “Never place the following items under or near a power line: houses, garages, sheds or barns, play equipment, pools, anything children or adults may climb.” (RMP Rights of way: Application for proposed use)
- 11) Considering all of the recent wildfires in California linked to High Voltage Lines, have the NESC standards been updated or changed to consider proximity to homes? How does RMP plan to accommodate to any changes?
- 12) How can this project be constructed safely with their limited easement?

We have found literature from RMP and other national power companies that give clear safety easements in measurements that would be impossible for RMP to ensure if installed using the existing route.

When residents purchased or built homes, we relied upon signed and notarized plat maps that indicated a 10 foot easement. There was never any indication that this small dashed line could extend into the middle of homes, over garages, over pools or even further without any limitation, compensation, or approval. The easement in question was written in 1955 over an agricultural zoned farm land. It needs to be re-evaluated to consider the development that has occurred and the structures and school that have been built in the last 60 years. This easement is NOT sufficient to provide adequate safety to the public.

This proposed project creates a very large and unnecessary burden on residents to the enjoyment of the use of their property, the concerns for safety, including but not limited to: stray voltage, electrocution, shock, fires, lightning, EMF, interference with pacemakers and safety in the event of catastrophic or natural disasters.

In the 2010 Salt Lake County Electrical Plan that was developed over a period of one year, tapping into a group of over 40 qualified individuals¹ and who were deemed as experts and part of a task force to map out the most desirable decisions for providing power to the growing valley. This 2010 body of experts determined the highest priority to AVOID for transmission line routes would be "residential neighborhoods, schools, and elderly populations" and that: "residential areas are the LEAST DESIRABLE LOCATIONS" because of the impact these lines have to the "character of the neighborhood and viewsheds", as well as perceived "reduction of property values and health effects".² At the public open house on July 16th, 2018 a Rocky Mountain Power representative even stated "We would *never* put in a new transmission line in this area"³. Why then should Rocky Mountain Power be allowed to implement a new upgrade in an area that past experts deemed undesirable and current experts agree is not ideal?

Solution:

We would like a formal investigation by the Public Service Commission as the State entity that can ensure safety for the public. We would like answers to our above questions. We request documentation with clear, and detailed standards and regulations RMP states they abide by for safety precautions, easement requirements, clearances, and guidelines for the 138kV line to answer our questions above. We also would like the details for their standards they are required to abide by for running their line by schools (as stated in their presentation). Some of the participants have children attending this school and want to know this information to ensure their safety as well.

We also would request that the Public Service Commission determine a just, reasonable, safe, proper route for this high voltage line and consider prescribing reasonable regulations on high voltage transmission line upgrade projects. Similar to when "upgrades" on building structures are done, the entire building needs to be brought up to the current codes for safety, so should it be considered that when upgrade projects on power lines are done, they should be held to the same parameters and require ensuring equivalent easements as new transmission lines. RMP has stated on two different occasions that other options were reviewed but the proposed route was selected due to "Cost Recovery"⁴, meaning the less expensive the line, the sooner profits are recognized.

Rocky Mountain Power should act responsibility for the protection and safety of the community and re-evaluate the alternative options and provide a comparative analysis of alternative options in respect to safety. Safety should be a higher importance than risking the safety of homes, residents and students.

Signature and Date:

 3/12/2019

¹ Powering Our Future Salt Lake County Electrical Plan Local Planning Handbook September 2010, Section 5 Undesirable Locations for Transmission Lines, p i

² Powering Our Future Salt Lake County Electrical Plan Local Planning Handbook September 2010, Section 5 Undesirable Locations for Transmission Lines, p 14

³ Rocky Mountain Power Open house 7/16/2018 – conversation involving Lisa Romney and Alene Bentley

⁴ Ben Clegg, RMP Project Manager 8/7/2018 – Working Meeting with City Leaders held at Bingham High School.