

Cindy L. Thompson
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West Valley City, UT 84120
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Pro se Complainant

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In Re:	:	Docket No. 23-035-03
Formal Complaint of Cindy L. Thompson	:	
against Rocky Mountain Power	:	COMPLAINANT’S REQUEST TO
	:	SUBPOENA DOCUMENTS AND
	:	EVIDENCE AND FOR AN EXTENSION
	:	OF TIME TO REPLY TO ROCKY
	:	MOUNTAIN POWER’S MOTION TO
	:	DISMSS AND ANSWER

Complainant, Cindy L. Thompson, (“Complainant”), *pro se*, hereby respectfully requests an order of subpoena in which to obtain documents and evidence and for an extension of time to reply to Rocky Mountain Power’s Motion To Dismss And Answer as follows:

1. On January 26, 2023, Complainant caused to be filed and served her Verified Complaint Against Rocky Mountain Power Corp. (“RMP”).
2. On February 27, 2023, Rocky Mountain Power caused to be filed and served its Motion To Dismss and Answer.
3. On March 14, 2023, Complainant caused to be filed and served her Complainant’s Request for Extension of Time to Reply to Rocky Mountain Power’s Motion to Dismss and Answer.
4. Since filing her March 14, 2023 Request for Extension of Time to Reply to Rocky Mountain Power’s Motion to Dismss and Answer, Complainant has been attempting to obtain testimony from experts who have knowledge of electric meters and are willing to testify as to the

damage caused by Rocky Mountain Power's faulty electric meter and/or its improper installation of its electric meter. See the Affidavit of Complainant attached hereto.

5. As provided in the Complainant's Affidavit attached hereto, several professional electricians have been to the Complainant's home and have assessed and commented on the damages caused by Rocky Mountain Power's faulty electric meter and/or its improper installation of its electric meter; however, Complainant has had little success in getting experts to testify in this case with Rocky Mountain Power Corp. because of conflicts of interest.

6. As provided in the Complainant's Affidavit attached hereto, Complainant has finally found a competent expert, Brady Grant, who has no ties to Rocky Mountain Power Corp. and is willing to provide expert testimony.

7. As provided in the Complainant's Affidavit attached hereto, it is the Complainant's intentions to work with Brady Grant to obtain the evidence necessary for him to provide accurate expert testimony.

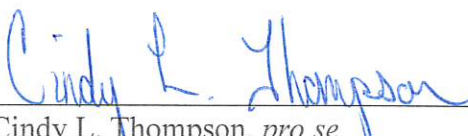
8. As provided in the Complainant's Affidavit attached hereto, Brady Grant needs access to the meter that Rocky Mountain Power removed from the meter base at the back of the Complainant's home.

9. Additionally, as provided in the Complainant's Affidavit attached hereto, Complainant believes it will be helpful to her in replying to Rocky Mountain Power's Motion to Dismiss and Answer if she has a copy of Rocky Mountain Power's bylaws, as well as other documentation in Rocky Mountain Power's possession.

For the reasons provided herein, Complainant respectfully requests until April 21, 2023, in which to provide Rocky Mountain Power Corp. with a subpoena requesting evidence and records necessary for her to reply to Rocky Mountain Power's Motion to Dismiss and Answer.

Additionally, Complainant requests an additional two weeks after receiving the subpoenaed evidence and documents in which to file and serve her reply to Rocky Mountain Power's March 14, 2023, Motion to Dismiss and Answer.

Respectfully submitted this 14th day of April, 2023.


Cindy L. Thompson, *pro se*
Complainant

CERTIFICATE OF SERVICE

Docket No. 23-035-03

I hereby certify that on the ____ day of April, 2023, I caused a true and correct copy of the foregoing Complainant's Request to Subpoena Documents and Evidence and For An Extension Of Time To Reply To Rocky Mountain Power's Motion To Dismiss And Answer, along with its accompanying Affidavit of Cindy L. Thompson, to be served by electronic mail to the following:

Public Service Commission

psc@utah.gov

Rocky Mountain Power

Data Request Response Center
Jana Saba

datarequest@pacificorp.com

jana.saba@pacificorp.com

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Autumn Braithwaite

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Carla Scarsella

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Utah Office of Consumer Services

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Bela Vastag

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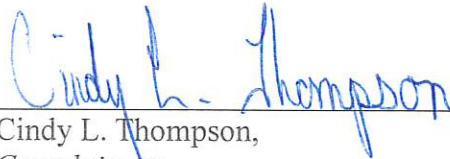
Division of Public Utilities

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Assistant Attorney General

Patricia Schmid
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Cindy L. Thompson,
Complainant

8. I have contacted electricians from Hunt Electric Company, Wasatch Electric Company and Taylor Electric, all of which have supported Adams findings but have declined to provide expert testimony because of their conflicts of interest with Rocky Mountain Power Corp.

9. Just recently, March 28, 2023, a family member recommended that I contact Brady Grant to take a look at my power outage problem(s). Because of scheduling conflicts, Brady wasn't able to come to my home to assess the electrical outage problem(s) until April 10, 2023.

10. Brady Grant has confirmed to me what Adam and other electricians have confirmed to me and is willing to provide expert testimony in this matter, however, Brady Grant has expressed to me that he would like access to the meter which was removed by Rocky Mountain Power Corp. at the time my home lost partial power, on or about April 25, 2022.

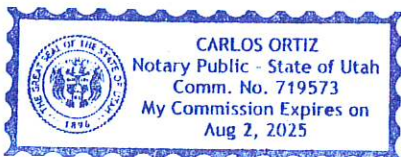
11. Additionally, I have had the opportunity of reading Rocky Mountain Power's Motion to Dismiss and Answer, and believe it would be beneficial for me to have documentation from Rocky Mountain Power before responding to its motion and answer, such as a copy of its bylaws.

FURTHER AFFIANT SAYETH NOT.

Cindy L. Thompson
Cindy L. Thompson

STATE OF UTAH)
)ss.
COUNTY OF SALT LAKE)

On this 14th day of April, 2023, personally appeared before me, Cindy L. Thompson, the signer of the foregoing Affidavit, who duly acknowledged to me that she executed the same.



[Signature]
NOTARY PUBLIC

Residing at Mountain America CU

My Commission Expires: Aug 2, 2025