

Cindy L. Thompson
4068 S. Claudia St.
West Valley City, UT 84120
Telephone: 801-541-1503
cindy.augiesmom@hotmail.com

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 MOTION TO
	:	COMPEL SUBPOENAED
	:	DOCUMENTS, RECORDS
	:	AND EVIDENCE

Complainant, Cindy L. Thompson, (“Complainant”), *pro se*, hereby moves for an order requiring that Rocky Mountain Power be compelled to produce subpoenaed documents, records and evidence as follows:

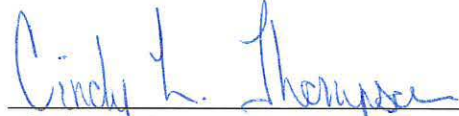
1. On April 21, 2023, Complainant caused to filed and served via e-mail her Subpoena Duces Tecum which required that Rocky Mountain Power provide Complainant with documents, records and evidence necessary for her to respond to Rocky Mountain Power’s February 27, 2023, Motion To Dismss And Answer. (See a copy of the Subpoena Duces Tecum attached hereto at **Attachment No 1.**)

2. With the Subpoena Duces Tecum, Complainant provided the Affidavit of Cindy L. Thompson, which provides that the Complainant requires the subpoenaed documents, records and evidence in order to respond to Rocky Mountain Power’s February 27, 2023, Motion to Dismss And Answer. (See a copy of the Affidavit of Cindy L. Thompson attached hereto at **Attachment No. 2.**)

3. Rocky Mountain Power has not responded to the Subpoena Duces Tecum.

WHEREAS, Complainant respectfully requests an order that Rocky Mountain Power be compelled to produce the subpoenaed records, documents and evidence requested in the Complainant's April 21, 2023, Subpoena Duces Tecum.

Respectfully submitted this 18th day of May, 2023



Cindy L. Thompson, *pro se*
Complainant

CERTIFICATE OF SERVICE

Docket No. 23-035-03

I hereby certify that on the 18th day of May, 2023, I caused a true and correct copy of the foregoing Complainant's Motion to Compel Subpoenaed Documents, Records And Evidence 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

utahdockets@pacificorp.com

Autumn Braithwaite
Carla Scarsella

autumn.braithwaite@pacificorp.com

carla.scarsella@pacificorp.com

Utah Office of Consumer Services

Michele Beck
Alyson Anderson
Bela Vastag
Alex Ware
Jacob Zachary
Madison Galt

mbeck@utah.gov

akanderson@utah.gov

bvastag@utah.gov

aware@utah.gov

jzachary@utah.gov

mgalt@utah.gov

ocs@utah.gov

Division of Public Utilities

Assistant Attorney General

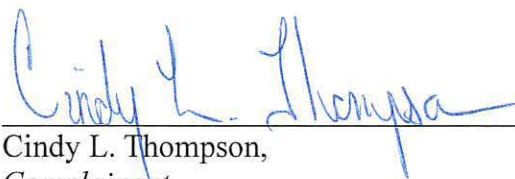
Patricia Schmid
Robert Moore
Patrick Grecu

dpudatarequest@utah.gov

pschmid@agutah.gov

rmoore@agutah.gov

pgrecu@agutah.gov


Cindy L. Thompson,
Complainant

ATTACHMENT NO. 1

Cindy L. Thompson
4068 S. Claudia St.
West Valley City, UT 84120
Telephone: 801-541-1503
cindy.augiesmom@hotmail.com

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	:	SUBPOENA DUCES TECUM
	:	

TO: Rocky Mountain Power Corp.

FROM: Cindy L. Thompson
4068 S. Claudia Street
West Valley City, UT 84120

Pursuant to Utah Code Ann. §§ 63G-4-205(1) and 63G-4-205(2) and Utah Admin. Code §746-1-402, YOU ARE COMMANDED to produce at the residence of Cindy L. Thompson, 4068 S. Claudia St., West Valley City, UT 84120, on or before Friday, May 5, 2023, the following:

1. The electricity meter that was removed by you on or about April 25, 2022, along with any prongs and/or wiring that was used by you to attach the electricity meter inside the meter box attached to the back of the home at 4068 S. Claudia St., West Valley City, UT 84120.
2. Rocky Mountain Power Corp's current Electric Service Requirements Manual.
3. Rocky Mountain Power Corp's current bylaws.

4. All correspondence between management, employees and service technicians of Rocky Mountain Power Corp. pertaining to this matter.

DATED this 21st day of April, 2023.

By: Cindy L. Thompson
Cindy L. Thompson
Complainant

ATTACHMENT NO. 2

Cindy L. Thompson
4068 S. Claudia St.
West Valley City, UT 84120
Telephone: 801-541-1503
cindy.augiesmom@hotmail.com

Pro se Complainant

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

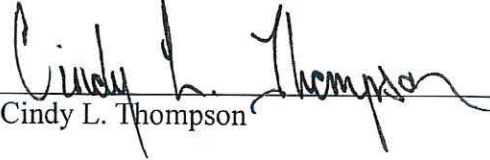
In Re:	:	Docket No. 23-035-03
Formal Complaint of Cindy L. Thompson	:	
against Rocky Mountain Power	:	AFFIDAVIT OF CINDY L. THOMPSON
	:	

STATE OF UTAH)
 :
COUNTY OF SALT LAKE)

CINDY L. THOMPSON (“Complainant”) being duly sworn deposes and says:

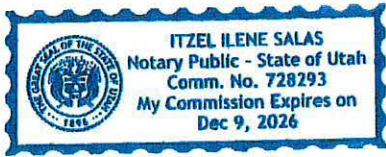
1. The information contained in this Affidavit is true and is based upon my knowledge.
2. I hereby certify:
 - (a) That the electric meter that was removed from my home located at 4068 S. Claudia St., West Valley City, UT 84120 by Rocky Mountain Power Corp. may contain crucial evidence as to Rocky Mountain Power’s faulty meter and/or Rocky Mountain Power’s poor installation of its meter.
 - (b) That the documentation being requested is necessary for Complainant to respond to Rocky Mountain Power’s Motion To Dismiss And Answer.

FURTHER AFFIANT SAYETH NOT.


Cindy L. Thompson

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

On this 21 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.



Itzel Ilene Salas
NOTARY PUBLIC

Residing at SALT LAKE

My Commission Expires: DEC 9, 2026

CERTIFICATE OF SERVICE

Docket No. 23-035-03

I hereby certify that on the 21st day of April, 2023, I caused a true and correct copy of the foregoing Subpoena Duces Tecum, along with the accompanying Affidavit of Cindy L. Thompson, to be served by electronic mail to the following:

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psc@utah.gov

Rocky Mountain Power

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mgalt@utah.gov

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Division of Public Utilities
Assistant Attorney General

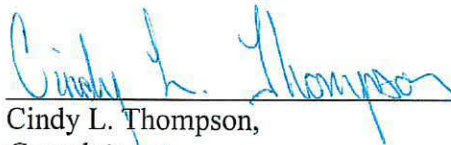
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Complainant