

May 23, 2023

VIA ELECTRONIC FILING

Utah Public Service Commission
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84114

Attention: Gary Widerburg
Commission Administrator

RE: **Docket No. 23-035-23 – Formal Complaint of Glenn Mickelson against Rocky Mountain Power**
Rocky Mountain Power's Response Addressing Safety Risks

Rocky Mountain Power submits its Response Addressing Safety Risks and Notice of Appearance in accordance with the Utah Public Service Commission's May 19, 2023, Notice of Filing and Comment Period in the above referenced matter.

The Company respectfully requests that all formal correspondence and requests for additional information regarding this filing be addressed to the following:

By E-mail (preferred): datarequest@pacificorp.com
utahdockets@pacificorp.com
jana.saba@pacificorp.com
zachary.rogala@pacificorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, OR 97232

Informal inquiries may be directed to Jana Saba at (801) 220-2823.

Sincerely,



Joelle Steward
Senior Vice President, Regulation & Customer/Community Solutions

Enclosures

CC: Service List

Zachary Rogala
Rocky Mountain Power
1407 W North Temple, Suite 320
Salt Lake City, UT 84116
(435) 319-5010
zachary.rogala@pacificorp.com
Attorney for Rocky Mountain Power

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

Formal Complaint of Glenn Mickelson against Rocky Mountain Power	DOCKET NO. 23-035-23 ROCKY MOUNTAIN POWER'S RESPONSE ADDRESSING SAFETY RISKS AND NOTICE OF APPEARANCE
---	---

On May 19, 2023, Glen Mickelson (“Complainant”) filed a Formal Complaint with the Utah Public Service Commission (“Commission”) against PacifiCorp, doing business in Utah as Rocky Mountain Power (“Rocky Mountain Power” or the “Company”). On May 19, 2023, the Commission issued a Notice of Filing and Comment Period, and directed Rocky Mountain Power to respond to several issues concerning public safety by May 23, 2023 (“Notice”). The Commission’s Notice requested the Company confirm whether it owns and operates the line identified in the Complaint, and if so, to identify any risks to the public with the currently exposed line.

Without waiving any affirmative defenses or other issues of fact or law to be included in the Company’s June 20, 2023, written response to the Complaint, the Company respectfully submits this Response Addressing Safety Risks and Notice of Appearance.

Communications regarding this Docket should be addressed to:

By e-mail (preferred):

datarequest@pacificorp.com
zachary.rogala@pacificorp.com
jana.saba@pacificorp.com

By mail: Data Request Response Center
Rocky Mountain Power
825 NE Multnomah St., Suite 2000
Portland, OR 97232

I. Response

1. The Company confirms that it both owns and operates the underground electrical line buried at approximately 40.465080 latitude, -112.084702 longitude, near the Yellow Fork Trailhead in Salt Lake County, Utah. As additional background, the Company represents that it installed the underground electrical line sometime prior to 1990, consistent with relevant safety and engineering protocols. The line is energized but encased in plastic conduit. The access road that the line is buried under is owned and maintained by the County of Salt Lake (“the County”). On or around May 4, 2023, the County regraded the road, and exposed the electrical line. The County attempted to remove the line, and ultimately caused a power outage on May 4, 2023, affecting approximately 68 customers. The Company’s Wasatch Restoration Center responded to the outage, repaired the line, and re-covered the exposed line on May 4, 2023. After this incident, snow around and above the re-covered line melted and eroded the road, re-exposing the line in various areas. Given the significant snowpack, there has been continued erosion risks throughout the late winter and spring.

2. Due to concerns regarding the continued re-exposure of the line from erosion, the Company is currently working on a long-term solution for the line that will likely involve re-burying the line. If re-burying the line is not possible due to obstructions or other unforeseen circumstances, the Company will encase the line in a conduit of more durable material or move the line to the side of the road. The Company expects that a long-term solution can reasonably be completed prior to by the end of 2023.

3. The Company is currently working on an interim solution for the re-exposed line that will likely involve marking the exposed line with caution tape, barricade, backfill, steel plates, or other means to notify and protect the public of any risks. The Company has previously restricted access to the road by placing locks on the access gate; however those efforts have been unsuccessful as those locks have been cut and removed by third-parties. The Company expects these efforts to be completed by June 2023.

4. The Company's June 20, 2023, written response regarding this matter will provide an update on these interim and long-term solutions.

5. The Company also confirms that, although the exposed energized line is encased in plastic conduit, there are some risks to the public. However the Company notes that the exposed line does not present a per se electrocution risk because the exposed line is similar to all electrical lines that are encased in plastic conduit and attached to utility distribution poles. For example, the same conduit that runs down the pole from a transformer to the ground, and then underground and interconnects with a customer's premise, is the same or similar underground conduit that is exposed near the Yellow Fork Trailhead. Even so, the Company considered de-energizing the line until the interim solution can be completed but does not have any redundant electrical lines that serve customers beyond the exposed line, and does not believe it can disconnect power to the line without interrupting customer service. Since the exposed line is encased in plastic conduit that greatly reduces the safety risk to the public and an interim solution will be implemented soon, the Company does not believe de-energizing the line is necessary or in the public interest.

II. Notice of Appearance

Company attorney Zachary Rogala will represent the Company in this proceeding, and is a member of good standing of the bar associations of Montana and Oregon.

Dated May 23, 2023,

/s/ Zachary Rogala
Zachary Rogala
Montana Bar No. 42343765
Senior Regulatory Counsel
Rocky Mountain Power
1407 W North Temple, Suite 320
Salt Lake City, UT 84116
(435) 319-5010
zachary.rogala@pacificorp.com

CERTIFICATE OF SERVICE

Docket No. 23-035-23

I hereby certify that on May 23, 2023, a true and correct copy of the foregoing was served by electronic mail to the following:

Glenn Mickelson (glenn@peakmobile.com)

Patricia Schmid (pschmid@agutah.gov)

Patrick Grecu (pgrecu@agutah.gov)

Robert Moore (rmoore@agutah.gov)

Utah Assistant Attorneys General

Madison Galt (mgalt@utah.gov)

Division of Public Utilities

Alyson Anderson (akanderson@utah.gov)

Bela Vastag (bvastag@utah.gov)

Alex Ware (aware@utah.gov)

Jacob Zachary (jzachary@utah.gov)

(ocs@utah.gov)

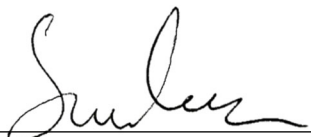
Office of Consumer Services

Data Request Response (datarequest@pacificorp.com)

Jana Saba (jana.saba@pacificorp.com)

utahdockets@pacificorp.com

Rocky Mountain Power



Santiago Gutierrez
Coordinator, Regulatory Operations