

Our response in support of our request for review or re-hearing with the Public Service Commission

Our response to Rocky Mountain Power's response addressing safety risks regarding Rocky Mountain Power's exposed and improperly buried Rose Canyon Line Extension. Starting at a location at or near the end of the paved portion of the Rose Canyon road.

Relating to their response dated May 23, 2023 Item (1);

A. The power company has correctly admitted that it owns and operates the photographed "under ground" power line.

B. We believe that the evidence clearly disputes the power company claims that they installed the underground electrical line consistent with relevant safety and engineering protocols. If they had done so, the cable would not be exposed on the surface of the road today.

C. The power company falsely claims that their energized line is also cased in plastic conduit. We request an on site inspection of the subject line attended by us, a public service commission representative, and the utility company representatives.

D. Rocky Mountain Power that the access road that the line is buried under is owned and maintained by the County of Salt Lake. This is utterly false. Only a portion of the of the road pertaining to this complaint is owned by "the County". Other portions of the road are owned by private individuals. Additionally a substantial portion of the power line of the subject road in this complaint is laid on the road of a 50 foot width federal public right-of way.

E. Rocky Mountain Power also alleges that "On or about May 4, 2023 Salt Lake County re-graded the road and exposed the electrical line. This claim is also utterly false. I have for several decades graded and maintained dirt roads in Salt Lake County, Tooele County, Utah County, Summit County and Morgan County. I personally testify as a professional heavy equipment operator that there is absolutely no evidence whatsoever to support said claims by Rocky Mountain Power. Further more, I have verified with parks department and Salt Lake County Roads Dept. that they have not done any road grading on subject road area at any time this year.

F. Further investigation with Salt Lake County has verified that they have not attempted to remove the energized 7200 volt subject power line in question. It appears extremely absurd that if the power company has a right of way that the county would never



High voltage cable not encased in conduit - like the one used in the Rose canyon line extension - the same cable pictured in the original complaint.

attempted to remove the energized power line unless it posed an imminent public safety emergency.

If Rocky Mountain Power has evidence of this criminal act by the county as alleged in their response, please provide the police or FBI case number.

G. Rocky Mountain further falsely claims that after May 4, 2023 they claimed to have re-buried the line, but I visited the line repair site on May 5, 2023 while Rocky Mountain Employees were still in process of repairing the burned power transmission line. At that time the road was dry, the weather was dry and no evidence of any runoff causing further erosion, nor any evidence of any road grading on May 4, 2023 or on May 5, 2023.

Docket 23-035-23 photograph taken on May 5, 2023 clearly shows this to be the case. Additionally it clearly shows that the exposed High voltage line has NO encasement in conduit.

If ever a photograph was worth a thousand words, this is it! The photo clearly evidences that the high voltage power line is NOT encased in plastic conduit as falsely claimed by the power company. Therefore it clearly remains as an electrocution hazard and constitutes an imminent public safety emergency.

H. In response to Rocky Mountain Power response item number(2) we submit the following:

1. Again the line is not at present encased in PVC or other conduit as falsely claimed. As a master electrician, I have personal experience laying miles of this type of cable and can rapidly identify the cable. If it was in conduit, I would not easily identify it.
2. Burying the line at the side of the road initially may sound like a good idea, however it should be clearly understood that the side of the road is very typically used for gutter use to control or eliminate road erosion. As a case in point on May 22, 2023 when Gary from Rocky Mountain Power called us with his ideas for temporary and permanent solutions to correct the improperly buried power line we were working at Stage Coach Estates Subdivision in Summit County. The subdivision was employing the use of a trackhoe to dig 15" to 34" deep gutter ways at the side of the road to control or eliminate erosion.
3. If a new buried cable was installed at least 6 feet or more from the side of the road that would make more sense. It is also obvious that the right side of the road would be unsuitable for cable burial, since this would place the cable in the Water Fork of Rose Creek. The left side of the road might be possible if buried far enough to the left of the road to be beyond the drainage gutter.
4. I would suggest burying the cable and conduit in the center of the road at a depth of 30" to 48" which should eliminate exposure of the cable.

In our response to item #5:

- A. The power company has in their response admitted that the unburied line poses a risk to the public. As a Master electrician with 38 years experience I categorically disagree that their assessment and response that an exposed energized 7200 volt power line

does not produce an electrocution risk to the public. It is CLEARLY OBVIOUS that the line is NOT encased in plastic conduit as falsely claimed in their response.

B. Additionally we so note the following upon further investigation of this Rocky Mountain Power, Rose Canyon Line Extension which was installed on or about 1989 the following:

- Upon further investigation we find no record of secured and recorded Utility Right Way on the Rose Canyon Line Extension per our complaint. One should also so note that a substantial portion of subject line is placed under a federal 50 foot wide public road right of way. We request that Rocky Mountain Power produce their 1989 recorded Utility Right of Ways relating to this complaint.

IN CONCLUSION::

Rocky Mountain Power has had a whopping 34 years for due diligence to complete their right of Way problem. May I kindly suggest that these inordinate delays are in all reality due to their INEXCUSABLE 34 year failure to secure said Utility Right of Way? As I see it, we are held as "Right of Way delay Hostages" while Rocky Mountain Power is asking for additional time to get their 34 year old problem resolved!