

**Subject:** Re: [INTERNET] Re: #8007219 Re: Rocky Mountain Power  
**Date:** Tuesday, May 31, 2022 at 5:30:08 PM Mountain Daylight Time  
**From:** Stefanie Liebert  
**To:** Ian McCubbin  
**Attachments:** image001.png, image002.png, image003.jpg, Formal Complaint Form and Instructions.pdf

Good evening Ian,

My apologies I didn't respond to your voicemail timely, I was out of the office last week.

The Division is not able to offer advice, we are simply here to facilitate informal complaints between Utah utility customers and regulated utility companies. If you remain unsatisfied with the response from Rocky Mountain Power you have the option to request for further mediation with the company, or you can file a formal complaint with the Public Service Commission.

I have attached those documents for your reference.

Please let me know if I can be of further assistance.

Have a good evening,

**Stefanie Liebert** | Office Specialist

801.530.6285 | [sliebert@utah.gov](mailto:sliebert@utah.gov)

On Tue, May 31, 2022 at 8:21 AM Ian McCubbin <[imccubbin@gmail.com](mailto:imccubbin@gmail.com)> wrote:

Hi Stefanie

I left a voice mail for you after the site visit here on Northmont. I am not sure what the next step it, and wanted to advice/guidance from DPU. What RMP said at that meeting is that undergrounding in the back yard is against RMP policy. However currently on a project on Northhills (same street) RMP is undergrounding currently behind the homes. Additionally according to RMP if they were to replace the poles that are currently expired, they would do that in the back of our homes. I am confused as to exactly what the RMP policy is for the back of homes? The contractor, Newman Construction sees the most effective, least cost, and minimal damage to our properties is to install the underground infrastructure in the backyards.

Also RMP stated that the priority is taking care of RMP. The last site visit I had last summer, RMP stated that the most important thing for the company is to maximize profit and minimize costs.

Please advise next steps, and what DPU thinks of this situation with RMP?

Thanks

Ian

970-819-2942

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**From:** Stefanie Liebert <[sliebert@utah.gov](mailto:sliebert@utah.gov)>  
**Date:** Tuesday, May 17, 2022 at 3:40 PM  
**To:** Ian McCubbin <[imccubbin@gmail.com](mailto:imccubbin@gmail.com)>  
**Subject:** Fwd: [INTERNET] Re: #8007219 Re: Rocky Mountain Power

Good afternoon Ian,

Both Brenda Salter and I will be in attendance to observe the meeting with Rocky Mountain Power, looking forward to seeing you Thursday.

Best,

**Stefanie Liebert** | Office Specialist

801.530.6285 | [sliebert@utah.gov](mailto:sliebert@utah.gov)

On Fri, May 13, 2022 at 10:17 AM Ian McCubbin <[imccubbin@gmail.com](mailto:imccubbin@gmail.com)> wrote:

Hi Stefanie

Will someone from your office be able to show up for this meeting?

Thanks

Ian

----- Forwarded message -----

From: **Ian McCubbin** <[imccubbin@gmail.com](mailto:imccubbin@gmail.com)>

Date: Fri, May 13, 2022 at 9:16 AM

Subject: Re: [INTERNET] Re: #8007219 Re: Rocky Mountain Power

To: Millward, Bryan (PacifiCorp) <[Bryan.Millward@rockymountainpower.net](mailto:Bryan.Millward@rockymountainpower.net)>

Cc: Talo, Florisa (PacifiCorp) <[Florisa.Talo@pacificorp.com](mailto:Florisa.Talo@pacificorp.com)>, Stefanie Liebert <[sliebert@utah.gov](mailto:sliebert@utah.gov)>, Spencer, Christopher (PacifiCorp) <[Christopher.Spencer@pacificorp.com](mailto:Christopher.Spencer@pacificorp.com)>, Mendoza, Alejandro <[Alejandro.Mendoza@gcinc.com](mailto:Alejandro.Mendoza@gcinc.com)>, Tim Watcke <[twatcke@gmail.com](mailto:twatcke@gmail.com)>

Thanks Bryan for making time for this meeting.

Be Well,

Ian

970-819-2842

On Fri, May 13, 2022 at 5:43 AM Millward, Bryan (PacifiCorp) <[Bryan.Millward@rockymountainpower.net](mailto:Bryan.Millward@rockymountainpower.net)> wrote:

Perfect. I will plan to meet you at your house on Thursday 5-19-22 at 1pm.

Thanks

Bryan Millward

Estimating Department

801-220-7267

1569 W North Temple

Salt Lake City, UT 84116

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**From:** Ian McCubbin <[imccubbin@gmail.com](mailto:imccubbin@gmail.com)>  
**Sent:** Thursday, May 12, 2022 4:53 PM  
**To:** Millward, Bryan (PacifiCorp) <[Bryan.Millward@rockymountainpower.net](mailto:Bryan.Millward@rockymountainpower.net)>  
**Cc:** Talo, Florisa (PacifiCorp) <[Florisa.Talo@pacificorp.com](mailto:Florisa.Talo@pacificorp.com)>; Stefanie Liebert <[sliebert@utah.gov](mailto:sliebert@utah.gov)>; Spencer, Christopher (PacifiCorp) <[Christopher.Spencer@pacificorp.com](mailto:Christopher.Spencer@pacificorp.com)>; Mendoza, Alejandro <[Alejandro.Mendoza@gcinc.com](mailto:Alejandro.Mendoza@gcinc.com)>; Tim Watcke <[twatcke@gmail.com](mailto:twatcke@gmail.com)>  
**Subject:** Re: [INTERNET] Re: #8007219 Re: Rocky Mountain Power

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Hi Bryan

We have confirmed with the contractors that we can meet next Thursday from 1-3 pm on site here at 555 Northmont Way, Salt Lake City, UT 84103. I have also asked at least comcast to show up.

Thanks

Ian

970-819-2842

On Thu, May 12, 2022 at 5:23 AM Millward, Bryan (PacifiCorp) <[Bryan.Millward@rockymountainpower.net](mailto:Bryan.Millward@rockymountainpower.net)> wrote:

Ian, next week I am available on Tuesday from 1pm-3pm or anytime Thursday from 8-11am or 1-3pm. Your welcome to invite any telecom companies if you feel that would be beneficial to you.

Let me know what date and times work.

Thanks

Bryan Millward

Estimating Department

801-220-7267

1569 W North Temple

Salt Lake City, UT 84116

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**From:** Ian McCubbin <[imccubbin@gmail.com](mailto:imccubbin@gmail.com)>  
**Sent:** Wednesday, May 11, 2022 8:45 PM  
**To:** Millward, Bryan (PacifiCorp) <[Bryan.Millward@rockymountainpower.net](mailto:Bryan.Millward@rockymountainpower.net)>  
**Cc:** Talo, Florisa (PacifiCorp) <[Florisa.Talo@pacificorp.com](mailto:Florisa.Talo@pacificorp.com)>; Stefanie Liebert <[sliebert@utah.gov](mailto:sliebert@utah.gov)>; Spencer, Christopher (PacifiCorp) <[Christopher.Spencer@pacificorp.com](mailto:Christopher.Spencer@pacificorp.com)>; Mendoza, Alejandro <[Alejandro.Mendoza@gcinc.com](mailto:Alejandro.Mendoza@gcinc.com)>; Tim Watcke <[twatcke@gmail.com](mailto:twatcke@gmail.com)>  
**Subject:** [INTERNET] Re: #8007219 Re: Rocky Mountain Power

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Hi Bryan

Thanks for the response. We have been working with multiple contractors for bids on this job. We were not able to get any of them to be available this week. What is your schedule next week, and we will setup an on-site meeting. Looking forward to getting this completed. We have the funding in place for this effort.

Would it be of value to have the telecom companies on site as well?

Be Well,

Ian

970-819-2842

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**From:** "Millward, Bryan (PacifiCorp)" <[Bryan.Millward@rockymountainpower.net](mailto:Bryan.Millward@rockymountainpower.net)>  
**Date:** Monday, May 9, 2022 at 9:59 AM  
**To:** Ian McCubbin <[imccubbin@gmail.com](mailto:imccubbin@gmail.com)>  
**Cc:** "Talo, Florisa (PacifiCorp)" <[Florisa.Talo@pacificorp.com](mailto:Florisa.Talo@pacificorp.com)>, Stefanie Liebert <[sliebert@utah.gov](mailto:sliebert@utah.gov)>, "Spencer, Christopher (PacifiCorp)"

<[Christopher.Spencer@pacificorp.com](mailto:Christopher.Spencer@pacificorp.com)>, "Mendoza, Alejandro"

<[Alejandro.Mendoza@gcinc.com](mailto:Alejandro.Mendoza@gcinc.com)>

**Subject:** #8007219 Re: Rocky Mountain Power

Ian, I am happy to meet and look at alternate options but I do want your contractor there so we have a meaningful and productive discussion. I am available on Tuesday from 1pm-3pm or Thursday from 8am to 11am.

Let me know what date and time works for you and your contractor.

Thanks

Bryan Millward

Estimating Department

801-220-7267

1569 W North Temple

Salt Lake City, UT 84116

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**From:** Ian McCubbin <[imccubbin@gmail.com](mailto:imccubbin@gmail.com)>

**Sent:** Thursday, May 5, 2022 8:39 AM

**To:** Millward, Bryan (PacifiCorp) <[Bryan.Millward@rockymountainpower.net](mailto:Bryan.Millward@rockymountainpower.net)>

**Cc:** Talo, Florisa (PacifiCorp) <[Florisa.Talo@pacificorp.com](mailto:Florisa.Talo@pacificorp.com)>; Stefanie Liebert <[sliebert@utah.gov](mailto:sliebert@utah.gov)>; Spencer, Christopher (PacifiCorp) <[Christopher.Spencer@pacificorp.com](mailto:Christopher.Spencer@pacificorp.com)>; Mendoza, Alejandro

<[Alejandro.Mendoza@gcinc.com](mailto:Alejandro.Mendoza@gcinc.com)>

**Subject:** [INTERNET] Re: Rocky Mountain Power

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Hello Bryan

Hope all is well. I have been emailing with Florisa Talo (copied) about the Northmont Way Underground project. Following the suggestion from you and Chris Spencer, we have been working with the list of contractors RMP provided in late CY2021. The feedback from most, if not all, of the contractors is that they all recommend looking at alternate options for the Northmont Way underground project. The suggestion is to either underground the electrical and telecommunications wires either under the street with laterals to each home, or underground the wires along the northside of the properties where the above ground wires currently reside up against the SLC Corp owned open space.

We would like to discuss with you developing some new plans for the job based on the feedback from these companies. We have a Civil Engineer engaged on this project named Alejandro Menodza (copied). Also there are some questions in the emails below from the contractors about getting more specific details on the bid estimate. It would be great if we could setup a meeting on site to discuss the best option forward. We do have the funding in place to execute this project quickly.

Let me know a good time to talk or meet.

Be Well,  
Ian McCubbin

970-819-2842

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**From:** "Talo, Florisa (PacifiCorp)" <[Florisa.Talo@pacificorp.com](mailto:Florisa.Talo@pacificorp.com)>  
**Date:** Friday, April 22, 2022 at 3:20 PM  
**To:** "[imccubbin@gmail.com](mailto:imccubbin@gmail.com)" <[imccubbin@gmail.com](mailto:imccubbin@gmail.com)>  
**Cc:** Stefanie Liebert <[sliebert@utah.gov](mailto:sliebert@utah.gov)>  
**Subject:** RE: Re: Re: Rocky Mountain Power

Dear Mr. McCubbin,

Rocky Mountain Power is generally open to discussing alternative approaches. When reviewing projects such as this, we consider all feasible alternatives for a Rule 12 relocation request. The Company's preferred alternative is intended to be the least cost option for the customer (conforming of course with company standards for location and type of facilities). Rocky Mountain Power feels comfortable with our current design, but are more than willing to have discussions about options that may or may not have been considered previously.

- Questions about specific routes and technologies, including the scope of work or line items in a bid, are best addressed through direct discussions with a company estimator.

For this project, please work with estimator Bryan Millward at 801-220-7267.

- After an initial consultation with an estimator, the Company generally provides one free estimate for the preferred relocation solution. If a customer is interested in us providing additional estimates related to alternative designs, the customer is responsible for the costs to prepare those estimates. In this situation, because of the nature of the project and the disruption of Covid, Rocky Mountain Power will provide an additional estimate at no cost to you. The estimator, Bryan Millward, can provide guidance on specific requests.
- Estimates provided by our company generally includes estimates for (1) a “turn-key” option, where we complete all work related to relocation of electrical facilities, and (2) an option where the customer independently hires a civil contractor to install all conduit (including excavation and landscape repair). As Rocky Mountain Power has always stated, the customer is responsible for all costs (material and labor) to change out all meter bases attached to their homes to allow for receiving power through underground conduit instead of overhead wire.
- An estimate provides equipment locations and conduit lengths. If the customer is trying to bid out the civil portion of the project (to determine the full estimated cost for an option where customer independently retains a civil contractor), our Company can have an on-site bid meeting with all contractors and stake out locations of equipment. Again, Bryan Millward would be the contact for this meeting.
- Customers are generally responsible to address the relocation of telecommunications facilities (if desired) with the owners of those facilities, namely, in this case, Comcast and Century Link. Rocky Mountain Power must defer to those companies and the Division with respect to that process.

The Company remains willing to move forward along the lines described in our prior correspondence.

Thank you,

**Risa Talo**

Customer Advocacy and Customer Service

801-955-2435



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**From:** Ian McCubbin <[imccubbin@gmail.com](mailto:imccubbin@gmail.com)>  
**Sent:** Thursday, April 14, 2022 1:58 PM  
**To:** Talo, Florisa (PacifiCorp) <[Florisa.Talo@pacificorp.com](mailto:Florisa.Talo@pacificorp.com)>  
**Cc:** Stefanie Liebert <[sliebert@utah.gov](mailto:sliebert@utah.gov)>  
**Subject:** Re: Re: Rocky Mountain Power

Hi Risa

Thanks for the response. We have a few more questions from potential vendors, and they are:

- IS RMP supplying any material for the underground work? (They usually do supply for materials or some like transformers, transformer pads, sectionalizing enclosures, wire, etc). It is normal procedure for them.....we just would like to know what pricing we need to provide without inflating the budget.
- Is there a scope of work description from RPM for this project??? We would like to know more than the mere plans regarding the scope for this project.
- IS there a Bid Schedule from RPM? It seems like they have a price, therefore they should have a bid schedule as well.....we would like to bid apples to apples....other than that, it feels like a design build, which could inflate the price and we would like to avoid that situation.

Thanks

Ian

On Thu, Apr 14, 2022 at 12:29 PM Talo, Florisa (PacifiCorp) <[Florisa.Talo@pacificorp.com](mailto:Florisa.Talo@pacificorp.com)> wrote:

Good Afternoon Stefanie,

We received both emails and should have a response ready for you both by next Friday the 22<sup>nd</sup>.

Thank you,

**Risa Talo**

Customer Advocacy and Customer Service

801-955-2435

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**From:** Stefanie Liebert <[sliebert@utah.gov](mailto:sliebert@utah.gov)>  
**Sent:** Wednesday, April 13, 2022 4:54 PM  
**To:** Talo, Florisa (PacifiCorp) <[Florisa.Talo@pacificorp.com](mailto:Florisa.Talo@pacificorp.com)>  
**Cc:** [imccubbin@gmail.com](mailto:imccubbin@gmail.com)  
**Subject:** Re: Rocky Mountain Power

Good afternoon Florisa,

I had the opportunity to speak with Mr. McCubbin this morning and there are a couple of questions or concerns that he would like to address.

First, in the snow storm we experienced on 4/11/2022 he and the surrounding neighbors experienced another power outage.


Second, Mr. McCubbin would like to know if Rocky Mountain Power agrees to go with one of the alternative approaches that he describes in his last email; would it be best for a new work order to be submitted to Rocky Mountain Power?

Last, Mr. McCubbin and I both agreed that going forward should we receive correspondence regarding the underground efforts for this neighborhood, that an acknowledgement of the emails with an estimated time of response would be appreciated.

Please let me know if you have any questions or concerns.

Thank you,

**Stefanie Liebert** | Office Specialist

  
801.530.6285 | [sliebert@utah.gov](mailto:sliebert@utah.gov)

On Sat, Apr 9, 2022 at 11:04 AM Ian McCubbin <[imccubbin@gmail.com](mailto:imccubbin@gmail.com)> wrote:

Hello Florisa and Stefanie

Thank you for the email responses regarding the undergrounding effort on Northmont Way SLC UT 84103. Based on guidance from Rocky Mountain Power (RMP) employees Chris Spencer (Managing Director, T&D Operations), TJ Turner (Capital Investment Manager) and Bryan Millward (Journeyman Estimator) we have been working with vendors to come up with the cost of undergrounding direct with one of RMP subcontractors or other vendors. RMP provided a list of companies for us to work directly with on obtaining estimates for this job in December 2021, and we have been engaged with them since that time. The current (attached) plans provided by RMP propose that the undergrounding of the utility lines is along the front (south side of properties) of our front yards. The feedback from most, if not all, of the vendors is this is the most expensive and disruptive approach to undergrounding the utility lines. There have been two suggested alternatives by the contractors. First option is to run the main underground utility lines under the street or the second option is to run the underground lines behind our homes in the open space where the above ground poles currently reside (north side of properties).

A few questions:

Is it Okay with RMP to proceed with these alternative approaches to reduce cost and minimize impact to driveways, other utilities (water) and damage to landscape?

Can we get plans from RMP for these 2 alternative approaches?

In regards to the Telecommunications companies (Century Link and Comcast) what is Rule 12 in referencing? Is this an RMP policy or DPU rules? For the last 3 years on the project we have struggled to understand and obtain the costs associated with the undergrounding effort for Comcast and Century Link. This has been the biggest unknown and unmanaged costs associated with this project. When homeowners ask for the full cost of this project we do not have an answer, as the telecommunications companies have not provided those cost estimates. Additionally if we do underground the RMP infrastructure, then we run the risk that the telecommunications infrastructure stays on the poles. What is the best way to proceed with Comcast and Century Link? Do we assume that if we provide them conduit below ground they will utilize it and remove from the poles?

Be Well,  
Ian

970-819-2842

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**From:** Stefanie Liebert <[sliebert@utah.gov](mailto:sliebert@utah.gov)>  
**Date:** Wednesday, March 23, 2022 at 9:28 AM  
**To:** "[imccubbin@gmail.com](mailto:imccubbin@gmail.com)" <[imccubbin@gmail.com](mailto:imccubbin@gmail.com)>  
**Subject:** Fwd: Re: Rocky Mountain Power

Good morning Ian,

Please see the response below from Rocky Mountain Power.

Best,

**Stefanie Liebert** | Office Specialist

  
801.530.6285 | [sliebert@utah.gov](mailto:sliebert@utah.gov)

----- Forwarded message -----

**From:** Talo, Florisa (PacifiCorp) <[Florisa.Talo@pacificorp.com](mailto:Florisa.Talo@pacificorp.com)>  
**Date:** Wed, Mar 23, 2022 at 8:32 AM  
**Subject:** RE: Re: Rocky Mountain Power  
**To:** Stefanie Liebert <[sliebert@utah.gov](mailto:sliebert@utah.gov)>  
**Cc:** \_Tariff Policy <[TariffPolicy@pacificorp.com](mailto:TariffPolicy@pacificorp.com)>

Good Morning Stefanie,

The answer to your question is below.

Q1. If the overhead lines are converted to underground- how is this facilitated with the other utilities, Lumen (CenturyLink), Comcast or others that may be attached to Rocky Mountain Power's poles?

A1. If a customer makes a Rule 12(6)(b) request for overhead to underground conversion and there are also overhead communication facilities, Rocky Mountain Power will notify

the joint use entities who own the overhead communications facilities of the Rule 12 request. The Applicant is then responsible to separately negotiate with those communication providers regarding the potential of relocating the communication facilities in a separate underground conduit. Rocky Mountain Power is willing to coordinate with the Rule 12 Applicant and the joint use entities to use the same contractor to install conduit, if feasible and there are economic efficiencies for the entire project. Rocky Mountain Power does not take a position whether communications providers can require any particular landowners to pay the costs of relocation or whether such communication providers are entitled to keep communications facilities in the existing overhead configuration after Rocky Mountain Power relocates its facilities. Rocky Mountain Power does not typically alter or move any communications facilities which it does not own. If the overhead communications facilities are not removed by the time that Rocky Mountain relocates its electrical facilities, Rocky Mountain Power will typically remove the tops of the poles owned by Rocky Mountain Power, thereby leaving the communications facilities in place (with ultimate resolution by the communications companies and landowners of whether such facilities will be moved). After a pole top is removed, Rocky Mountain Power will typically convey ownership of the remaining pole to the owner of any remaining communication facilities if such communications facilities are not removed within a reasonable time.

Please let me know if you have any additional questions or concerns.

Thank you,

**Risa Talo**

Customer Advocacy and Customer Service

801-955-2435

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**From:** Stefanie Liebert <[sliebert@utah.gov](mailto:sliebert@utah.gov)>  
**Sent:** Thursday, March 17, 2022 1:30 PM  
**To:** Talo, Florisa (PacifiCorp) <[Florisa.Talo@pacificorp.com](mailto:Florisa.Talo@pacificorp.com)>  
**Subject:** Re: Rocky Mountain Power

Thank you Risa, I will update the complaint with this information.

When I spoke to the customer earlier this week, he also had a question that was not in his written complaint. If the overhead lines are converted to underground- how is this facilitated with the other utilities, Lumen (CenturyLink), Comcast or others that may be attached to Rocky Mountain Power's poles?

Best,

Stefanie Liebert

Office Specialist

Division of Public Utilities

(801)-530-6285

*Business hours are 8:00 a.m. - 5:00 p.m., Monday-Friday*

On Thu, Mar 17, 2022 at 10:58 AM Talo, Florisa (PacifiCorp) <[Florisa.Talo@pacificorp.com](mailto:Florisa.Talo@pacificorp.com)> wrote:

Dear Mr. McCubbin,

We received your complaint from the Department of Public Utilities, and we appreciate your concerns.

Regarding the reliability concerns, Rocky Mountain Power understands any outage is an inconvenience for our customers. We do our best to restore outages as quickly and safely as possible. One of our top priorities as a company is to provide our customers with reliable service. We are unable to guarantee, however, that there will never be service interruptions. Please refer to Section 5 of Electric Service Regulation No. 4, a copy of which is available at:

[https://www.rockymountainpower.net/content/dam/pcorp/documents/en/rockymountainpower/rates-regulation/utah/rules/04\\_Supply\\_and\\_Use\\_of\\_Service.pdf](https://www.rockymountainpower.net/content/dam/pcorp/documents/en/rockymountainpower/rates-regulation/utah/rules/04_Supply_and_Use_of_Service.pdf)

We must also emphasize that there have been multiple issues accessing this segment of line. When landowners deny us access to our electrical facilities for regular maintenance such as vegetation management and other work, it increases the potential for an outage occurring; it also frustrates restoration when an outage occurs. Over the years, there have been some difficult and hostile interactions. We respectfully ask that you maintain a professional demeanor, and we expect the same from our employees. The safety and well-being of our customers and employees is paramount. We also respectfully ask that you allow access when work is being done on the line.

Regarding a project for undergrounding the overhead line located at the back of your property, we attach for reference the letter to you dated December 9, 2019. In addition to a number of separate communications with you, there was also an open meeting with you and your neighbors on Monday, February 3<sup>rd</sup> of 2020 at the Sweet Library to discuss these issues. In sum, considerable energy has already been devoted to assisting you with this request. The company remains willing to proceed with a line extension to relocate electrical facilities underground, consistent with Electric Service Regulation No. 12 Section 6(b), which reads as follows:

***(b) Overhead to Underground Conversions***

*For overhead to underground conversions, the new underground system must not impair the use of the remaining overhead system. The Applicant or Customer must elect either: to provide all trenching and backfilling, imported backfill material, conduits, and equipment foundations that the Company requires for the relocation; or, to pay the Company to provide these items.*

*In addition, the Applicant or Customer must advance the following:*

- (1) The estimated installed cost of the new facilities plus the estimated removal expense of the existing facilities, less***
- (2) The estimated salvage value of the removed facilities and depreciation on the original facilities.***

Ultimately, there needs to be a written contract and full payment received before work can occur on this type of project, but many unknowns persist. For example, are you making the request alone? Or are your neighbors joining in the request as part of a consolidated project? In late 2019 and early 2020, we gave you and your neighbors an estimate for a consolidated project to move electrical facilities underground, but we did not receive a conclusive response from the group after our meeting. We sympathize with the logistical challenges in coordinating with eleven landowners, but you will need to present a concrete request if you desire to move this project forward.

At this time, the company is still willing to fund a portion of the total project cost, based on the ability to defer costs associated with anticipated system upgrades at that location. This offer cannot, however, remain open indefinitely, and the company may eventually decide to proceed with planned system upgrades if a consolidated request is not made and finalized with a written agreement.

We appreciate your time and cooperation and remain ready to move forward with a Rule 12 request if, and when an appropriate request is made.

Thank you,



**Risa Talo**

Customer Advocacy and Customer Service

801-955-2435