

May 14, 2025

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. 25-035-26
In the Matter of the Formal Complaint of Melissa Cantrell Against Rocky Mountain Power
Rocky Mountain Power's Answer and Motion to Dismiss

Pursuant to the Notice of Filing and Comment Period issued by the Public Service Commission of Utah on April 18, 2025, Rocky Mountain Power ("Company") hereby submits for filing its Answer and Motion to Dismiss in the above referenced matter. Confidential Attachment A has been uploaded to the Commission's SFTP site.

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
max.backlund@pacificorp.com
katherine.smith@pacificorp.com

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

Informal inquiries may be directed to Max Backlund at (801) 220-3121.

Sincerely,



Joelle Steward
Senior Vice President, Regulation

Enclosures

Katherine Smith (18823)
Rocky Mountain Power
1407 West North Temple, Suite 320
Salt Lake City, Utah 84116
Telephone No. (435) 776-6980
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Attorney for Rocky Mountain Power

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

Formal Complaint of Melissa Cantrell against Rocky Mountain Power	DOCKET NO. 25-035-26 ANSWER AND MOTION TO DISMISS
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Pursuant to Utah Code Ann. § 63G-4-204(1) and Utah Admin. Code §§ R746-1-206, and R746-1-301, Rocky Mountain Power, a division of PacifiCorp (“Rocky Mountain Power” or the “Company”) answers the formal complaint (“Complaint”) filed by Melissa Cantrell (“Complainant”) with the Public Service Commission of Utah (“Commission”). The Company also moves to dismiss the Complaint with prejudice because Rocky Mountain Power has not violated any provision of law, Commission order or rule, or Company tariff for which relief can be granted.

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By mail:

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BACKGROUND AND ANSWER TO COMPLAINANT’S ALLEGATIONS

1. Complainant is a residential customer, taking service from the Company at the address listed in the formal complaint filing submitted by the Complainant on April 14, 2025 (“Complaint”).

2. On or around February 15, 2025, Complainant contacted the Company regarding her electric bill, claiming she did not believe her bill was accurate based on her usage. In response to this inquiry, the Company attempted to provide Complainant her usage data and explain her billing. Complainant continued to state her bill was unjustified based on her usage. In response, the Company opened a work request to connect Complainant with an energy advisor.

3. On or around February 18, 2025, the energy advisor contacted Complainant. Complainant was working at the time and declined to speak with him.

4. On or around February 19, 2025, the energy advisor reached out to Complainant again to discuss her energy usage and billing. After the energy advisor and Complainant spoke, the work request was subsequently closed.

5. Later that day, Complainant initiated an informal complaint with the Division of Public Utilities (“DPU”), disputing the accuracy of her bill. In response, the Company’s customer advocacy team issued a request for a meter test.

6. On or around February 19, 2025, a Company field employee visited Complainant's residence to perform the meter test. When performing site visits, it is typical practice for the Company's field employees to knock on the door to inform residents of their presence on the property as a courtesy and for safety reasons. The Company employee knocked on Complainant's door to inform her of his presence, which unfortunately woke the Complainant who was sleeping. The field employee apologized to the Complainant. Complainant declined a meter test at that time and declined to provide a more convenient time for the Company employee to return and perform the meter test. The Company employee left Complainant's property without performing a meter test and escalated Complainant's issue to the Company's help desk.

7. On or around February 20, 2025, the Company's customer advocacy team called Complainant and attempted to resolve the issue and schedule a convenient time to test the meter. Complainant disconnected the call without providing a convenient time to test the meter. The Company followed up with Complainant via email explaining the Company would be happy to reschedule a meter test.

8. On or around February 27, 2025, the Company was able to visit Complainant's property and test the meter.¹ Complainant's meter tested 99.99% accurate. This is within the acceptable accuracy range under Electric Service Regulation No. (7)(4)(a).

9. That same day, Complainant called the Company, expressing continued concern for her high bill and frustration with the meter test results. Complainant continued to assert her meter was inaccurate and demanded a new meter and a different meter technician contact her.

¹ Under Electric Service Regulation No. 7(3), "[u]pon request, the Company shall promptly and without charge test the accuracy of a customer's meter."

10. On or around February 28, 2025, Complainant reported to the Company of “suspicious wires” on her property and that her neighbor was complaining of a power outage at the same time Complainant’s meter was tested, causing the Complainant to suspect her neighbor was stealing electricity from her. When discussing potential causes for the high bill, Complainant reported that the lower level of her residence was locked by the owner of the residence, and she was not aware of what, if any, electric usage was taking place on the bottom floor of the residence. Because Complainant suspected her neighbor was stealing power from her, she requested Company field personnel return to conduct an inspection of the grounds of her home.

11. On February 28, 2025, a Company field employee visited the Complainant’s residence to conduct the inspection. The Company field employee found no evidence of tampering. The Company’s field employee left a door hanger note for the Complainant explaining that even though the wires from the Complainant’s residence and her neighbor’s residence are connected to a common pole, this was standard electric equipment. It was not evidence of electricity theft. The door hanger note also informed the Complainant that the field employee could not see how a meter removed for testing on one house would cause the electricity to go out on another house in response to the Complainant’s suspicions that her neighbor was stealing her electricity. A picture of the door hanger note was provided by the Complainant in the informal complaint.

12. In response to the Complainant’s concerns, the Company reviewed the neighbors account, conducted a site visit, and performed a meter test and found no evidence of tampering.

13. On or around March 3, 2025, Complainant called the Company again to report concerns of theft by her neighbor and requested to speak to a supervisor.

14. In response, on or around March 5, 2025, the Company emailed Complainant reaffirming that Complainant's meter is within acceptable accuracy range, and confirmed Complainant's bill was correct.

15. That same day, on or around March 5, 2025, Complainant contacted the DPU to state that the technician that tested the meter left a door hanger note, which she interpreted as the Company's field employee advising her of possible tampering. The Company believes the Complainant was referring to the door hanger previously discussed, which actually indicated the wiring was accurate and that the field employee could not see evidence of tampering.

16. On or around March 12, 2025, Complainant emailed the Company's customer advocacy team, continuing to claim miswiring and theft of service. Complainant demanded service upgrades, relocation of wires, and replacement of the transformer.

17. In attempts to resolve the issue, a local field manager visited the property, on or around March 13, 2025, and re-tested Complainant's meter and Complainant's neighbor's meter, again confirming there was no tampering of wires, meter, or service. The Complainant expressed concerns about the age of the transformer serving her residence and requested a transformer inspection. The Company's field manager spent approximately 90 minutes with the Complainant attempting to address her concerns.

18. On or around March 17, 2025, Company field employees made a site visit to the Complainant's residence to inspect the transformer and meter base as requested. The employees explained to the Complainant that the equipment was in proper working condition. Due to the ongoing inquiries and concerns over high bills, the Company replaced the Complainant's Automated Meter Reading ("AMR") meter with an Advanced Metering Infrastructure ("AMI")

meter to allow the Complainant to monitor interval usage details through Complainant's online portal.

19. The Complainant again contacted the Company on or around March 19, 2025, claiming theft of service. The Company closed the request because the Company had performed multiple site visits, tested multiple meters multiple times, inspected the wires and transformer, and replaced Complainant's meter with a meter with upgraded technology to help Complainant monitor her usage.

20. On or around April 14, 2025, Complainants filed the Complaint, requesting her entire bill be refunded from December 2024 through May 2025, with an inconvenience credit added to her account.

MOTION TO DISMISS

21. The Company requests the Commission dismiss the Complaint with prejudice under Utah Rule of Civil Procedure 12(b)(6) because Complainant has failed to allege or establish that the Company has violated any applicable law, Commission rule, or Company tariff for which relief can be granted.

22. Complainant claims her bill is too high due to a variety of reasons. Complainant's arguments for her high electric bill include, but are not limited to, a faulty meter, a tampered meter, tampered wires, power theft from neighbors, and a faulty transformer.

23. The Company has visited Complainant on numerous occasions, tested her meter multiple times and subsequently replaced her meter with an AMI meter that provides Complainant with further details on her usage to help resolve any of her concerns about her usage and her energy bill.

24. During these site visits to Complainant's residence, multiple Company representatives have explained to her what tampering looks like and why there are no signs of tampering to infrastructure on or around her property. The Company also performed an inspection on the transformer and found no problems with its working condition.

25. According to the Company's records, Complainant's utility bill increased when she moved from her apartment to a stand-alone house, which was built in the 1960s. The Company has continually encouraged Complainant to utilize the online portal associated with the AMI meter, where she can see a detailed breakdown of her usage and bill. Also, Complainant is unable to enter or know what is in the locked, bottom floor of her residence.

26. In the Formal and Informal Complaints, Complainant also alleges she has been charged "backpay" for energy usage before she moved into her current residence. The Company's records show the Complainant had the service connected on December 10, 2024, which is when the charges at that location began. The Company did not charge the Complainant for service at the location prior to December 10, 2024. A copy of the Complainant's bill for that time period is provided as Confidential Attachment A. Charges for time period prior to December 10, 2024 relate to the Complainant's prior residence. The Company notes that the Complainant did not remove the prior residence, an apartment, from her name until December 24, 2024.

27. The Company tested her meter multiple times, as well as her neighbor's meters. The results of these tests were normal, adhering to Company's Electric Service Regulation No. 7(4)(a). Under this ESR, "[i]f a meter tested is more than two percent fast, the Company shall refund to the customer the overcharge based on the correct meter readings for the period the meter was in use... Alternatively, this ESR states that "[i]f a meter tested pursuant to this section is more

than two percent slow, the Company may bill the customer for the estimated power and energy consumed but not covered by the bill...”

28. When the Company tested Complainant’s meter, the test results were 99.99% accurate, well within the established 98% and 102% parameters. Therefore, Complainant’s meter is accurate, and the Company has not violated its tariffs.

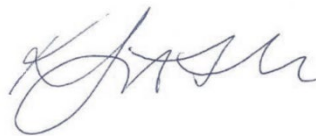
29. The Company requests the Commission dismiss the Complaint with prejudice because the Company has not violated any provision of law, Commission order or rule, or Company tariff for which relief can be granted.

CONCLUSION

30. For the foregoing reasons, the Company respectfully requests that the Commission dismiss the Complaint with prejudice.

Dated this 14th day of May 2025,

ROCKY MOUNTAIN POWER



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Salt Lake City, Utah 84116
Telephone No. (435) 776-6980

Attorney for Rocky Mountain Power

CERTIFICATE OF SERVICE

Docket No. 25-035-26

I hereby certify that on May 14, 2025, a true and correct copy of the foregoing was served by electronic mail to the following:

Utah Office of Consumer Services

Michele Beck mbeck@utah.gov
ocs@utah.gov

Division of Public Utilities

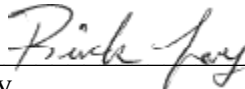
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Rick Loy
Coordinator, Regulatory Operations

**Attachment A is Confidential in its entirety and
provided under a separate cover**