

RE: Docket No. 25-035-26 Opposition to a Motion to Dismiss

**Heber M. Wells State Office Building
160 East 300 South,
Fourth Floor P.O. Box 4558
Salt Lake City, Utah 84114**

**Melissa Cantrell
367 S. 450 W.
Cedar City, UT 84720
4357041701
melissa_cantrell@hotmail.com**

Introduction

Plaintiff, Melissa Cantrell, hereby submits its opposition to Defendant's Motion to Dismiss the Complaint. The Plaintiff's Complaint not only meets but exceeds the standards governing the form of a complaint as required by Federal Rule of Civil Procedure 8(a). Specifically, this Court has personal jurisdiction over the Defendant, and the complaint sufficiently alleges causation and harm. Accordingly, Defendant's motion should be denied.

Argument

In a requested 30-day response, a Rocky Mountain Power Employee, Rick Loy, sent a PDF encrypted email that was in a zipped file, that failed to open, was locked, encrypted, and password protected and failed to meet the 30 day response. Melissa Cantrell reached out to him via email and telephone with no response: therefore, as a representative of Rocky Mountain Power, in failing to respond, the request made by Melissa Cantrell will be enacted in pursuant to **Utah Code Ann. § 63G-4-204(1) and Utah Code Ann. §§ R746-1-206**. Since Rocky Mountain Power did violate the law, they are responsible for damages incurred. They have violated [Consumer Sales Practices Act](#) (R152-11) and [Deceptive Trade Practices Act](#) (Title 13, Chapter 11a) in pursuit to increase Utah State power bills by 30%, and if Rocky Mountain Power cannot legislate it, they will use faulty meters,

overloaded transformers, rusted tanks, broken wiring, deceptive billing practices, and coercion to enrich themselves. As PacifiCorp is still Rocky Mountain Power parent company, this gives them a monopoly on the energy in the Pacific and Southwest. They have mismanaged, abused, used deception tactics to repress any counter action. This power utility is not in service to the Utah State Public but is a display of flexing pure power and pure greed. This violates the **Utah Consumer Sales Practices Act 13-11-1 to 13-11-23**.

The plaintiff, Melissa Cantrell, disagrees with statements 1-30 by Rocky Mountain Power.

The plaintiff, Melissa Cantrell adds addendums.

Items blocked off are address/location.

Exhibit A Rick Loy created an encrypted file that would not open and emailed it.

Exhibit B Rick Loy sent a password that failed to work and did not respond to emails or phone calls.

Exhibit C 1 and 2 Retaliatory/Unsubstantiated bill over \$590

Exhibit D Faulty Meter Electric showing Accurate at over 100.02% power (overcharge) per onsite tech.

Exhibit E 1 and 2 Damaged electric meter, Overloaded transformer (feed 5 lines). Per notes of onsite tech.

Exhibit F Tech visit document Full load 100.17% Weight Avg 100.11%

Exhibit G Meter unscrewed/tampered with damaged

Exhibit H Rusted tank/broken wires, potential fire hazard.

Exhibit I Transformer with over 5 lines overloaded and over billing.

Exhibit J Cancellation Threats, Forced Payment Plan and HEAT tax paid program to get money

Conclusion

In reply to the Motion to Dismiss, Rocky Mountain Power by failing to send appropriate documentation to the Plaintiff, Melissa Cantrell, Rocky Mountain Power failed to meet the deadline, failed to respond by the deadline and failed to provide appropriate documentation. For the foregoing reasons and all the others discussed in Plaintiff's Complaint, the present Motion to Dismiss should be denied.

As stated in my previous claim, I need December 2024 - May 2025 refunded free of charge and a substantial inconvenience credit added to my account. I want Rocky Mountain Power to refund the State of Utah the \$2 million in taxes that they illegally claimed and paid back with interest. I also want Rocky Mountain Power to reimburse all tax related Federal funds they acquired from the \$96 billion received at the end of the Biden presidency, any funds received from the State of Utah be reimbursed to the state and returned to the citizens. As mentioned before in my claim, I would like the State of Utah to issue a \$165 billion fine to Berkshire-Hathaway and put an end to the monopoly, have Rocky Mountain Power banned and dismantled.

Further, if Rocky Mountain Power refuses to pay, I would like an injunction filed on all their properties in Utah, confiscate their properties and auctioned off each property to 15 year + long-term Utah residents that will better manage the energy needs of Utah.

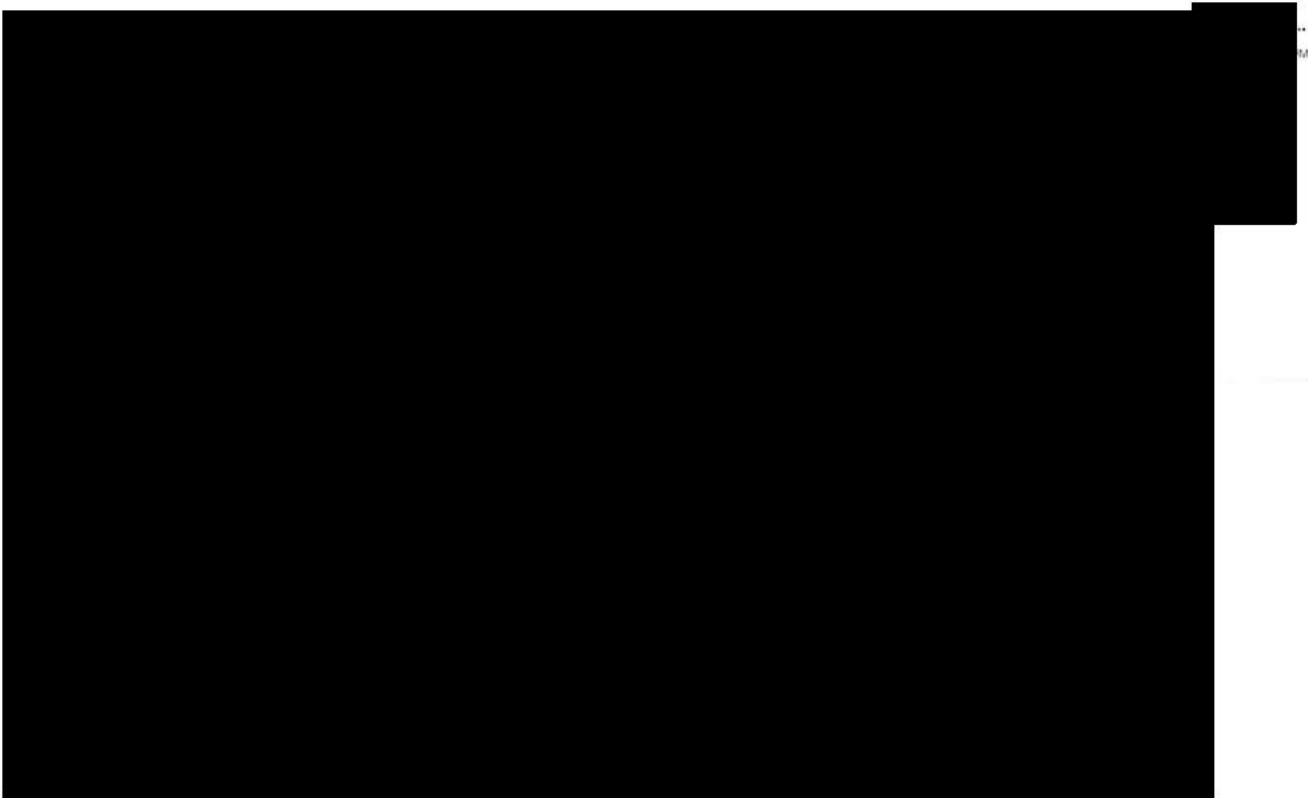
Date and Signature

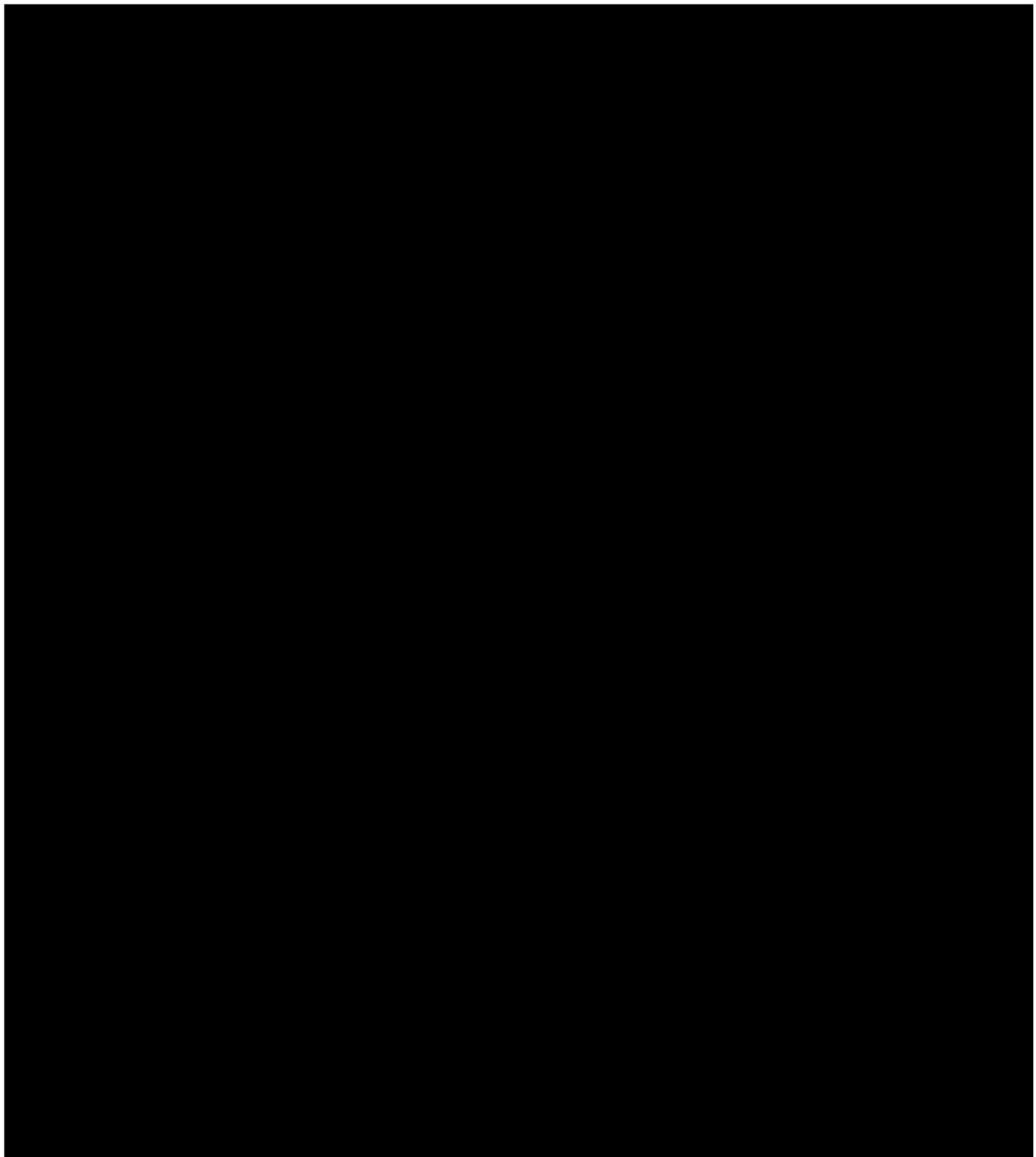
Melissa Conhill 5-28-25

Exhibit A



Exhibit B





[REDACTED]

Exhibit C 2

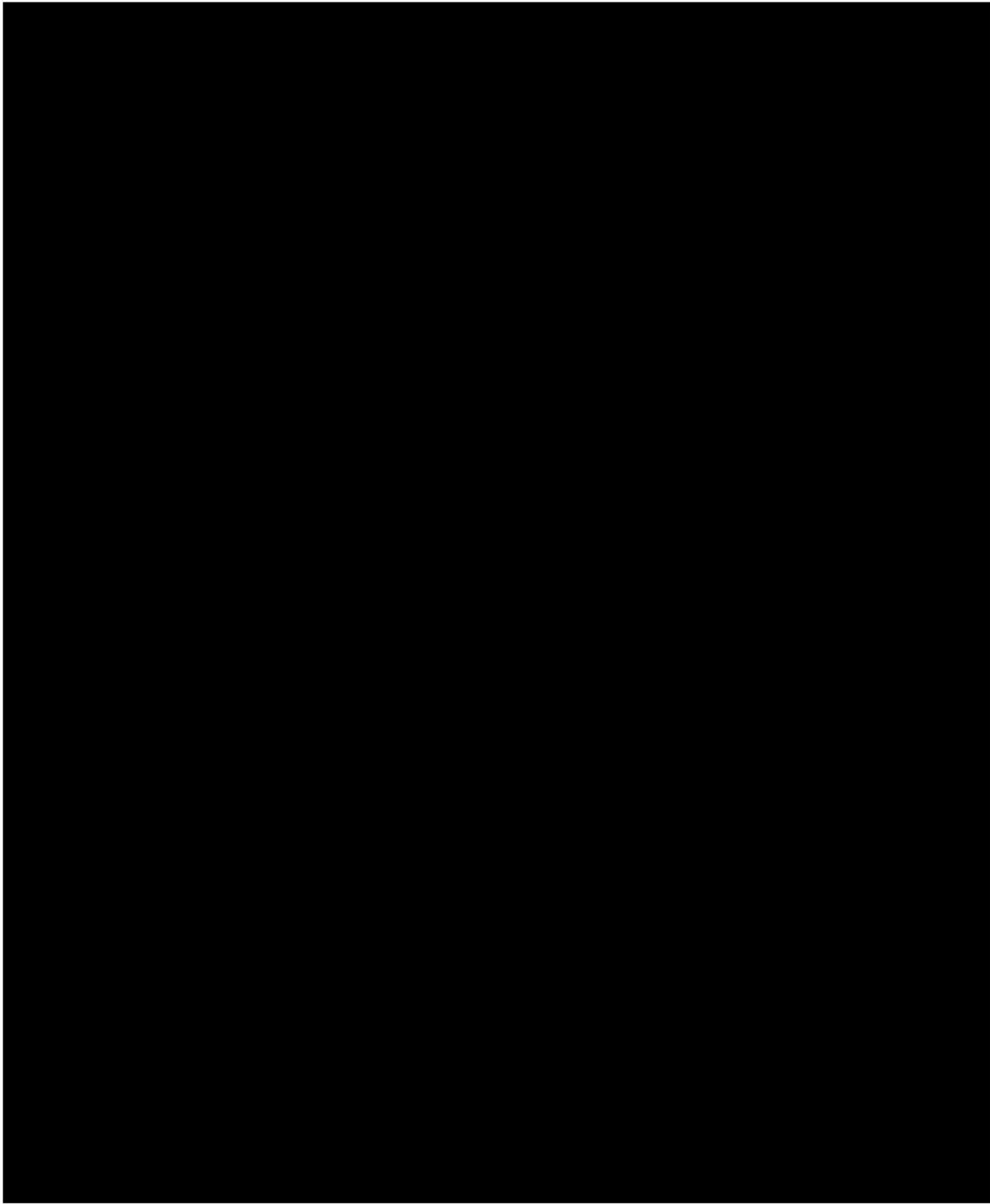


Exhibit D

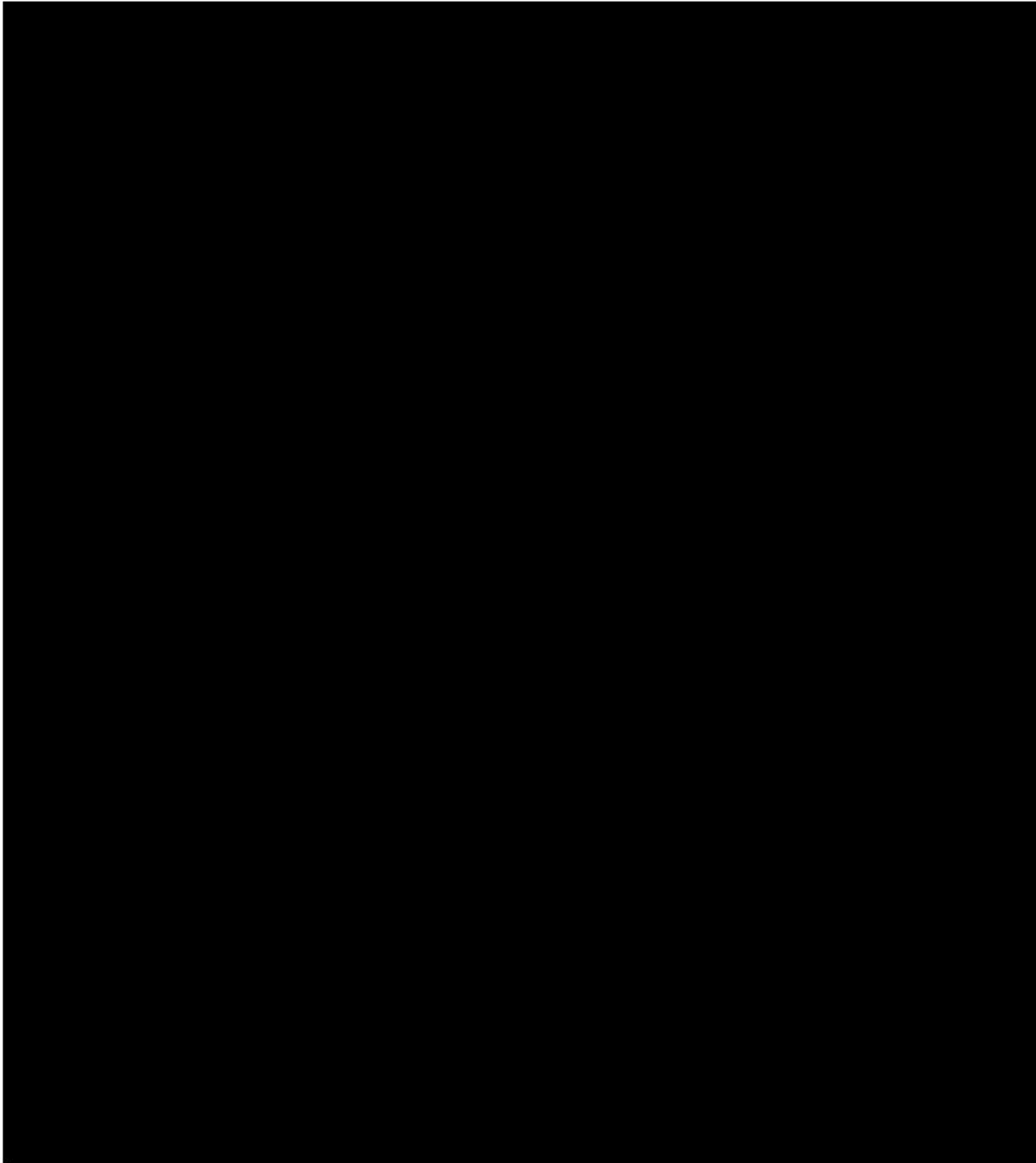


Exhibit E 1



Exhibit E 2

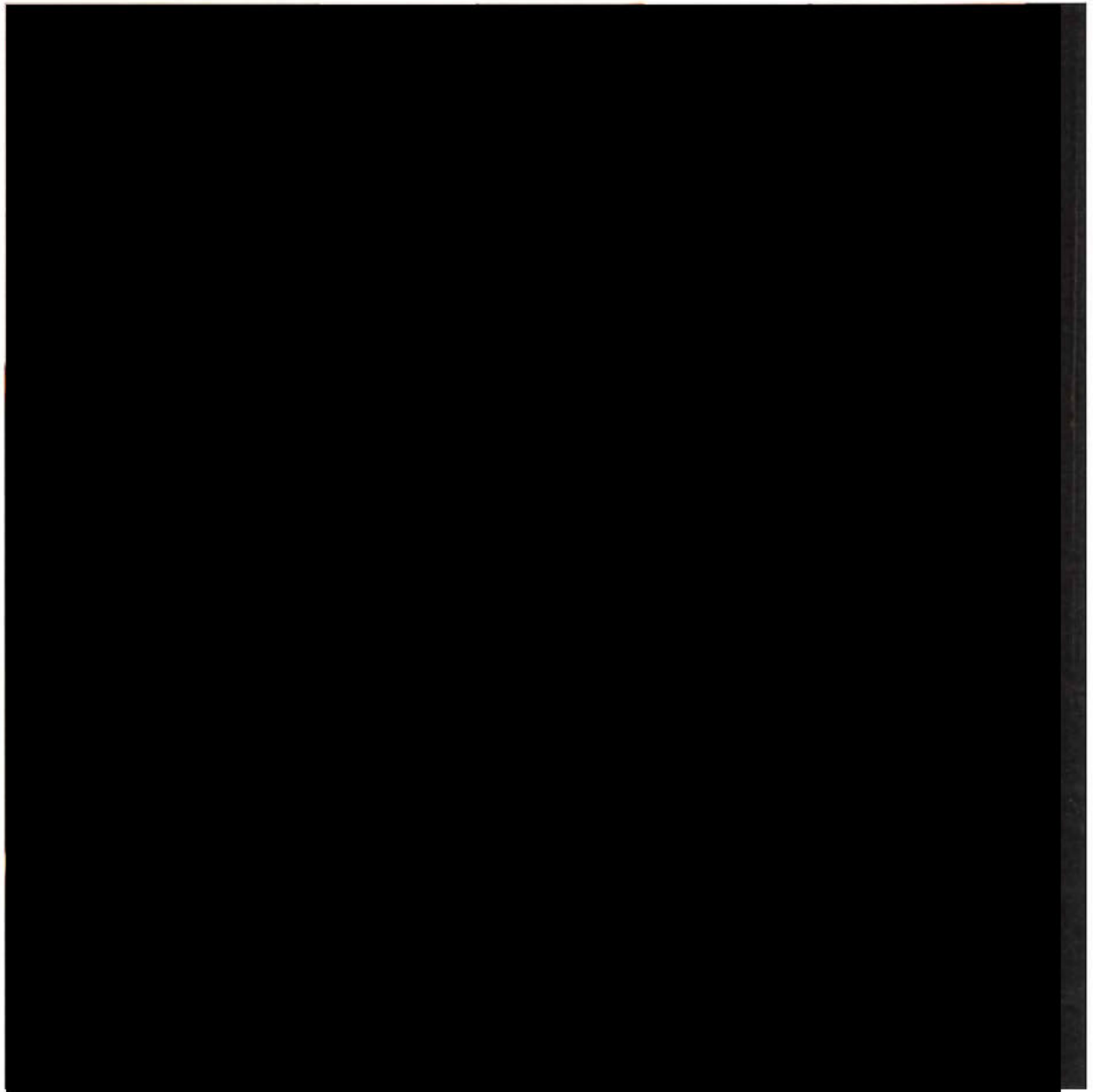


Exhibit F

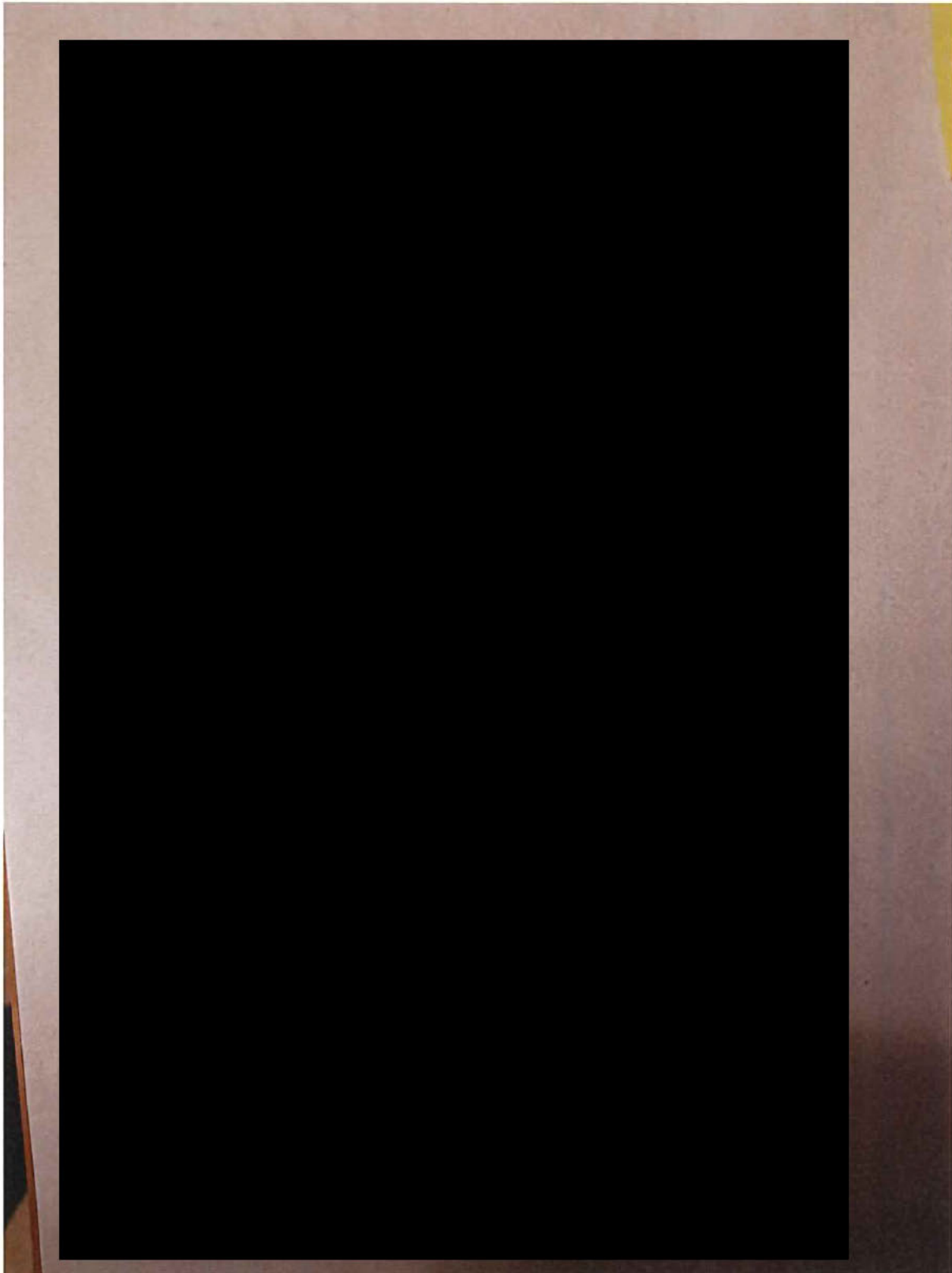


Exhibit G 1



Exhibit G 2 Possible Electric Theft. Meter opened by undoing screws and washers.



Exhibit G3

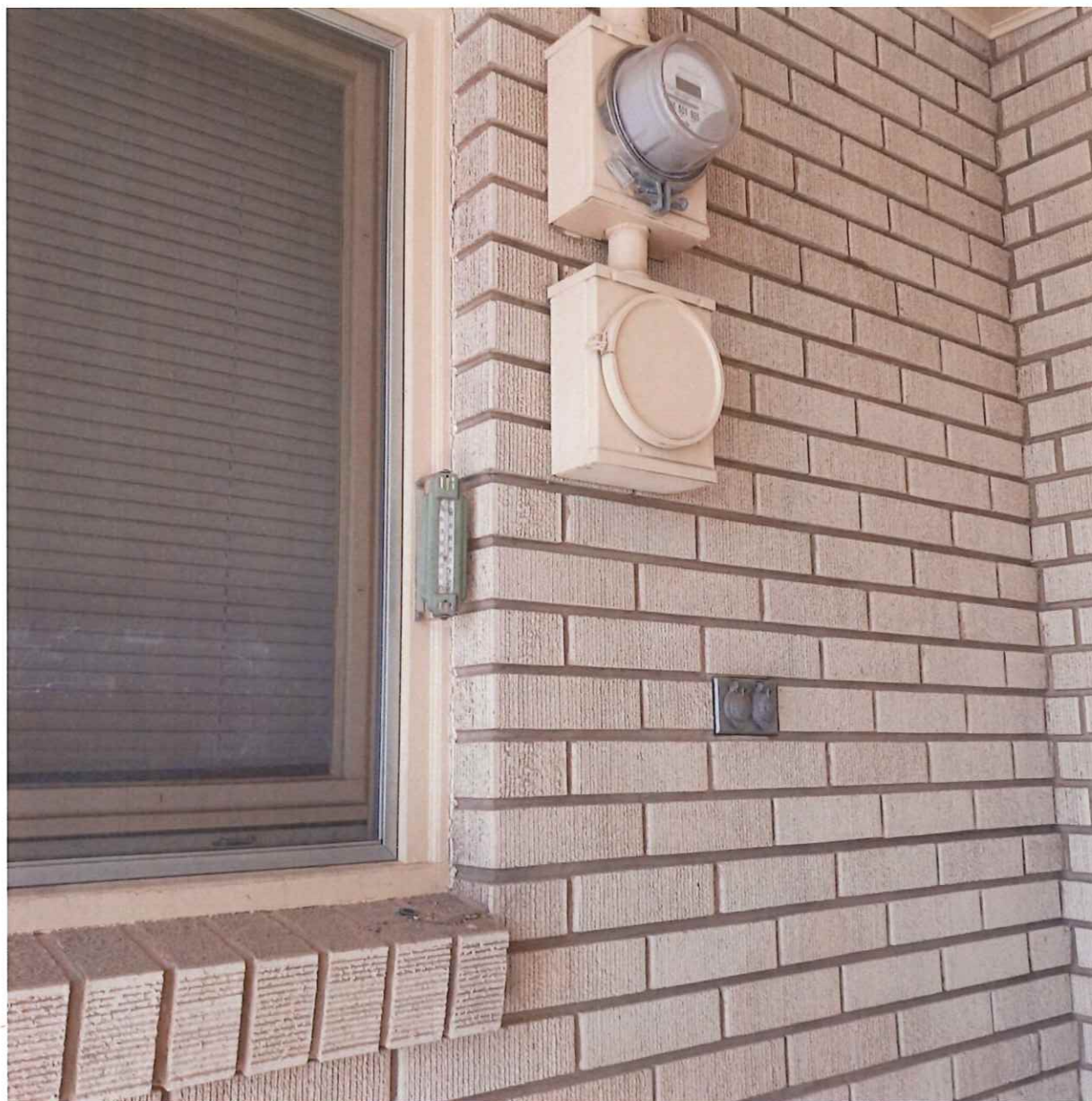


Exhibit H

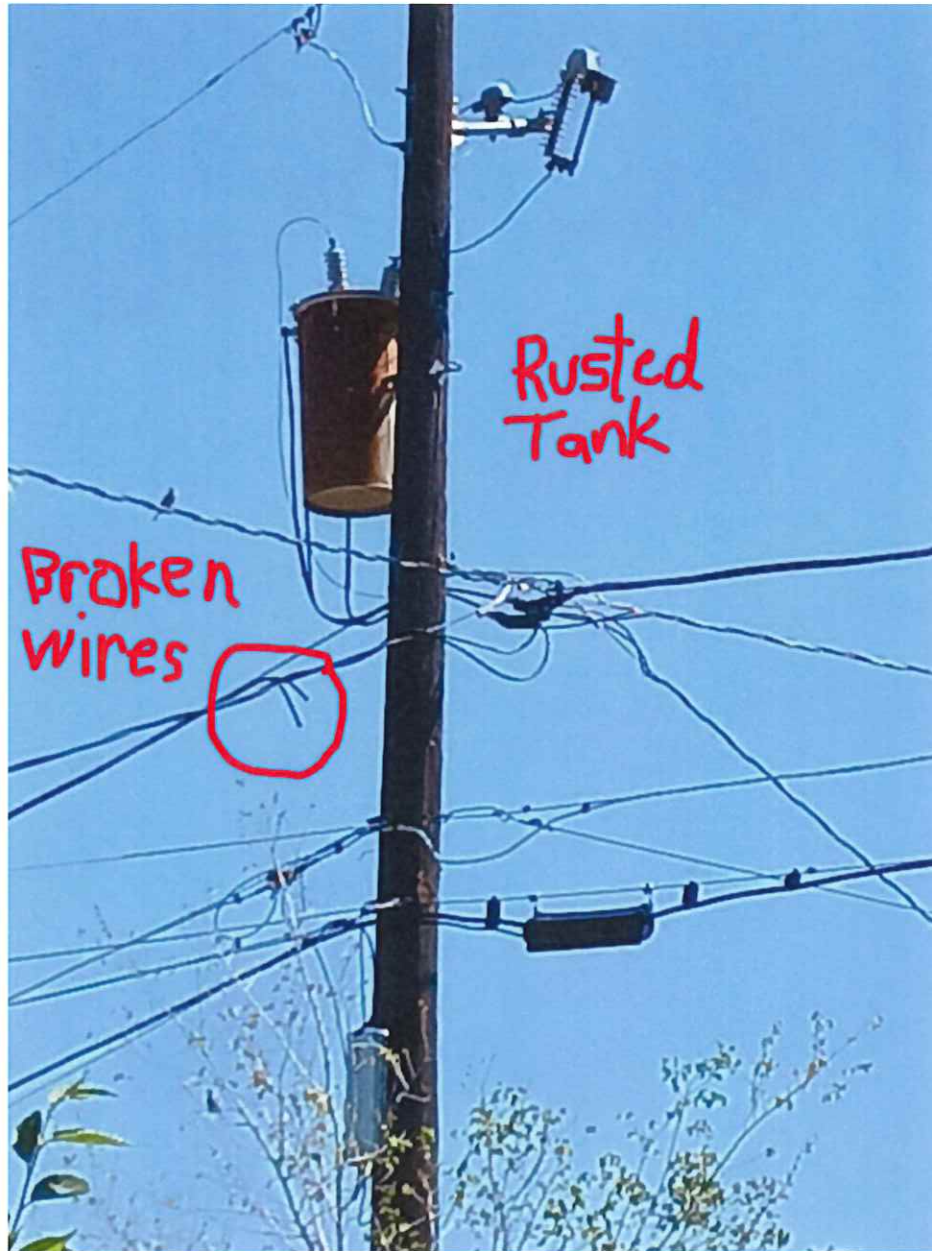


Exhibit I Overloaded Transformer with 5 connections

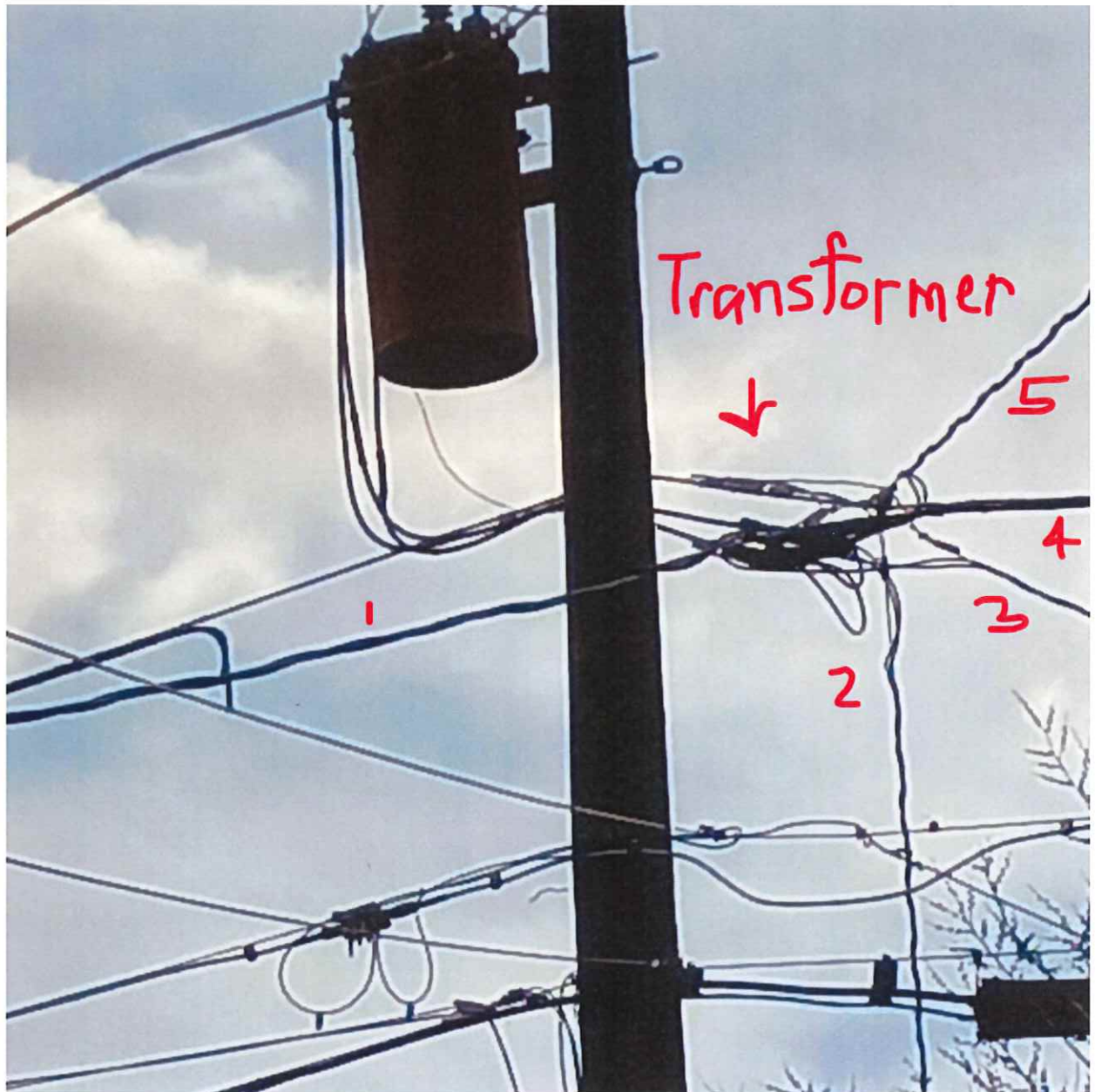


Exhibit J How RMP Threatens Disconnect and Forces People into Payment Plan and uses your tax dollars to get money.

