

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

Formal Complaint of Joseph Ybarra against
Rocky Mountain Power

DOCKET NO. 25-035-53

COMPLAINANT'S RESPONSE TO
RESPONDENT'S RESPONSE

Complainant submits this Response to address Respondent Rocky Mountain Power's conduct and the extensive statutory violations, false statements, and materially misleading representations that have occurred throughout this process. The evidence establishes a consistent pattern of misrepresentation to citizens, land-use authorities, and this Commission. These were not isolated errors; they were repeated, coordinated, and targeted in ways that suggest deliberate avoidance of statutory requirements and suppression of public participation.

Respondent violated multiple provisions of Utah law, including Utah Code §§54-18-301 and 54-18-302, Utah Code §54-3-1, Utah Code §54-7-25, Utah Code §76-8-504, land-use accuracy statutes under Utah Code §§10-9a and 17-27a, and Commission rules requiring transparency and candor. The record demonstrates that Respondent did not act in good faith, and that its statements and submissions cannot be relied upon without further investigation.

The purpose of this filing is to identify, with specificity, the most consequential violations and misrepresentations, supported with Respondent's own statements, timestamps, and contradictions, demonstrating a clear pattern of bad-faith engagement.

SECTION I — VIOLATIONS OF UTAH CODE §54-18

A. Defective 60-Day Notice (Violation of §54-18-301(4)(b))

Section 54-18-301(4)(b) requires the 60-day notice to include the address of the designated contact person and a corridor map sufficient for landowners to determine whether they are “affected landowners” under §54-18-102(2). Respondent’s notice contained neither.

The map included in the notice was not a corridor map; it was an indistinct illustration of a study area incapable of showing any affected-landowner boundaries. Planning commission staff themselves stated:

“It’s difficult on this map... it’s difficult to see on this map.”

— Bryce Armstrong, Utah County Planning Commission Meeting Aug 19, 2025 (12:17–12:35)

Respondent’s project manager confirmed the deficiency:

“Here’s a graphic of the proposed route, we… made the graphic a bit easier to view.”[than the one that had been sent out]

— Rita Ruderman, Planning Commission (27:02)

An unreadable study area map does not satisfy §54-18-301(4)(b). Failure to provide a usable corridor map directly deprived affected landowners of their statutory right to understand their status and participate meaningfully in the process.

[Statute: Utah Code §§54-18-301(4)(b), 54-18-102(2);
Evidence: Aug. 19, 2025 Planning Commission Meeting (12:17–12:35; 27:02);
Document: RMP 60-Day Notice Packet (Map), Affidavits from Affected Landowners]

B. Failure to Notify Affected Landowners (Violation of §54-18-301(3))

Respondent failed to notify affected landowners in the study corridor, including the Salem Park neighborhood. Section 54-18-301(3) requires notice to all affected landowners as defined in §54-18-102(2). Respondent repeatedly acknowledged its own corridor:

“Affected landowners… within the corridor… 500 feet, which is 250 feet on each side of the center line.”

— Tami Moody, Utah County Planning Commission (03:37:49–03:38:32)

Despite that, Respondent later told affected landowners:

“You’re not impacted, we’re not on your land.”

— Tami Moody, Oct. 16, 2025 meeting

Affidavits from Salem Park residents confirm that no notice was received. Respondent’s filings admit that notice was not mailed to these landowners (RMP Answer and Motion to Dismiss 20). This directly contradicts Respondent’s public statements to the Utah County Planning Commission:

“Sent out notices… to all individuals within the 500-foot study area… 250 feet on each side of that preferred route center line.”

— Tami Moody, Planning Commission (33:11–33:22; 52:04–52:18)

Respondent’s false statements concealed statutory violations and misled land-use authorities about who was entitled to notice.

[Statute: Utah Code §§54-18-301(3), 54-18-102(2);
Evidence: Aug. 19, 2025 Planning Commission Meeting (33:11–33:22; 52:04–52:18; 03:37:49–03:38:32);
Evidence: Oct. 16, 2025 Meeting (“You’re not impacted…”);
Document: Affidavits from Salem Park & Snowy Egret Residents]

C. Failure to Publish Required Newspaper Notice (Violation of §54-18-302(2))

Section 54-18-302(2) requires public-workshop notices to be published in a newspaper of general circulation at least 14 days prior to the workshop.

Respondent falsely claimed in the August 19 Planning Commission meeting:

“Information was also distributed through several media outlets including the Salt Lake Tribune, the Deseret News, and the Daily Herald.”

— Tami Moody, 33:39–33:51

Respondent also told citizens directly that public-workshop notices had been published, attaching a document it represented as a published notice. This notice was never printed in any newspaper.

Respondent told KUTV:

“Did publish notices in three different newspapers about the open houses.”

— RMP spokesperson, KUTV, Sept. 9, 2025

This was false. Newspaper archives confirm no publication occurred. Respondent’s filings also misrepresented publication dates for the November 2025 workshop. The earliest publication occurred on October 29, only 12 days before the workshop, not the required 14.

This failure deprived citizens of lawful access to statutory workshops and is a direct violation of §54-18-302(2).

[Statute: Utah Code §54-18-302(2);
Evidence: Aug. 19, 2025 Planning Commission Meeting (33:39–33:51);
Evidence: KUTV Broadcast (Sept. 9, 2025);
Document: Newspaper Archive Verification, Fake “Published” Notice Email to Citizen]

D. Misrepresentation of Workshop Requirements (Violation of §54-18-302(1))

Section 54-18-302(1) requires properly noticed workshops held in locations along the proposed corridor. When citizens at a October 16, 2025 meeting asked whether it was a workshop, Respondent stated:

“These are not a requirement for anything... It’s not like a workshop.”

— Tami Moody, Oct. 16, 2025

This was false. Respondent represented the same event to the PSC as a statutory workshop. Respondent’s contradictory statements misled citizens regarding their statutory rights and discouraged participation at a critical moment, undermining §54-18-302’s public-engagement purpose.

[Statute: Utah Code §§54-18-302(1)–(2);
Evidence: Oct. 16, 2025 Meeting (“Not a workshop... not required”);
Document: Newspaper Publication Dates (Oct. 27 & 29, 2025)]

E. False Claim of Statutory Compliance (Violation of §54-3-1 and §76-8-504)

Respondent repeatedly asserted full statutory compliance. At the Planning Commission, Respondent stated:

“This project... followed the compliance requirements for Utah State Code 54-18.”
— Tami Moody, 32:43–33:04

This statement was false. Respondent failed to:

- Notify affected landowners;
- Publish required notices;
- Include required corridor maps & address for contact person;
- Provide 14-day notice;
- Conduct proper workshops.

A false assurance of compliance to a land-use authority constitutes a materially false statement affecting an official proceeding, in violation of **Utah Code §54-3-1** (truthfulness required) and **§76-8-504** (false statements to public servants).

[Statute: Utah Code §§54-3-1, 54-7-25, 76-8-504;
Evidence: Aug. 19, 2025 Planning Commission Meeting (32:43–33:04);
Document: All Notice-Related Exhibits (missing map, missing notices, missing publications)]

F. Summary of Violations Under §54-18

Respondent violated the core statutory requirements intended to protect landowners and ensure transparent routing decisions. These violations were not minor procedural lapses but failures that eliminated notice to entire neighborhoods, misled government officials, and prevented lawful participation in the siting process.

[Statute: Utah Code §§54-3-1, 54-7-25, 76-8-504;
Evidence: Aug. 19, 2025 Planning Commission Meeting (32:43–33:04);
Document: All Notice-Related Exhibits (missing map, missing notices, missing publications)]

SECTION II — VIOLATIONS OUTSIDE UTAH CODE §54-18

Respondent's conduct violated numerous obligations independent of §54-18. Even if §54-18 did not exist, the following actions would constitute actionable misconduct under Title 54, criminal statutes governing false statements to public officials, and state land-use accuracy requirements.

[Statute: Utah Code §§54-3-1, 54-7-25, 76-8-504;
Evidence: Aug. 19, 2025 Planning Commission Meeting (33:11–33:22; 52:04–52:18; 33:39–33:51);
Evidence: KUTV Broadcast (Sept. 9, 2025);
Document: Affidavits, Newspaper Archive Verification, Email to Citizen with Fake Notice]

A. False Statements Contrary to Record Evidence (Violations of Utah Code §§54-3-1, 54-7-25, and 76-8-504)

1. False Claims That Affected Landowners Were Notified

Respondent stated to the Planning Commission:

“Sent out notices... to all individuals within the 500-foot study area... 250 feet on each side of that preferred route center line.”

— Tami Moody, 33:11–33:22; 52:04–52:18

This was false. Respondent's own filings later acknowledged that Salem Park residents received no notice. Affidavits confirm widespread non-receipt.

False statements made to a public body during an active land-use review violate:

- **§54-3-1** (utility obligation of honesty);
- **§54-7-25** (false statements influencing regulatory matters);
- **§76-8-504** (false or misleading statements to public officials).

[Statute: Utah Code §§54-3-1, 54-7-25;
Evidence: Aug. 19 PC Meeting (33:11–33:22; 52:04–52:18);
Document: Affidavits from Salem Park Residents]

2. False Statements That Newspaper Notices Were Published

Respondent represented to the Planning Commission:

“Information was also distributed through... the Salt Lake Tribune, the Deseret News, and the Daily Herald.”

— Tami Moody, 33:39–33:51

Respondent repeated these claims to citizens by email, sending a fake representation of the document purportedly published in a newspaper.

Respondent also stated publicly:

“Did publish notices in three different newspapers about the open houses.”
— RMP spokesperson, KUTV, Sept. 9, 2025

None of these statements were true. Newspaper records confirm no such notices were ever published.

Providing knowingly false information to citizens, regulators, and the media violates:

- **§54-3-1;**
- **§54-7-25;**
- **§76-8-504.**

[Statute: Utah Code §§54-3-1, 54-7-25, 76-8-504;
Evidence: Aug. 19 PC Meeting (33:39–33:51);
Evidence: KUTV Broadcast (Sept. 9, 2025);
Document: Newspaper Archive Verification, Fake Notice Email]

3. False Statements Regarding Federal Permitting Status

Respondent repeatedly suggested that federal permitting was underway. Yet Respondent’s own personnel contradicted this:

“They [the BLM] have not really given us any feedback.”
— Patricia Peterson, Oct. 16, 2025
“They [the BLM] are in the process of getting into… the permit application.”
— Richard B., Oct. 16, 2025

These statements confirm that NEPA had not begun. Respondent had no Notice of Intent, no scoping, no ePlanning docket, and no federal record of any NEPA initiation.

Falsely asserting federal permitting status to citizens and local governments—when the federal record shows none—constitutes a materially false statement under §§54-3-1, 54-7-25, and 76-8-504.

[Statute: Utah Code §§54-18-201(3), 54-3-1;
Evidence: Oct. 16 Meeting (statements about “no feedback” and “in the process of getting into the permit application”);
Document: Absence of BLM Notice of Intent, Absence of Project Listing in ePlanning]

B. Materially Misleading Statements (Violations of Utah Code §§54-3-1 and 54-4-1, and State Land-Use Accuracy Requirements)

1. Misrepresenting the Definition of “Affected Landowner”

Respondent accurately stated:

“Affected landowners... within the corridor... 500 feet, which is 250 feet on each side of the center line.”
— Tami Moody, Planning Commission (03:37:49–03:38:32)

Then 2 months later the Respondent’s same agent told affected landowners the opposite:

“You’re not impacted, we’re not on your property.”
— Tami Moody, Oct. 16, 2025

Respondent further mischaracterized affected-landowner status:

“[an affected landowner] would be a landowner... from whom we would need to obtain an easement... not neighboring landowners.”
— Rita Ruderman, Planning Commission (03:58:23–03:58:37)

This contradicts both the statute and Respondent’s own earlier testimony. These statements misled landowners regarding their statutory rights and constitute violations of Title 54 and land-use accuracy obligations.

[Statute: Utah Code §§54-18-102(2), 54-3-1;
Evidence: Aug. 19 PC Meeting (03:37:49–03:38:32);
Evidence: Oct. 16 Meeting (“You’re not impacted...”);
Document: Affected-Landowner Map, Affidavits]

2. Misleading Claims About Undergrounding Cost

Respondent repeatedly told the Planning Commission:

“Undergrounding can be... 15, 20 times as expensive.”
— Rita Ruderman, Planning Commission 01:09:01–01:09:09; reaffirmed 03:46:33–03:46:47

These claims were unsupported. Respondent has:

- No engineering study on 345 kV undergrounding;
- No third-party cost estimate;
- No feasibility report; and
- No internal documentation supporting the “20×” figure.

Respondent’s own representative admitted:

“Our VP of Ops was like, we’re not exploring that, we’re not going to do that.”
— Richard B., Oct. 16, 2025

A claimed cost multiplier without supporting engineering analysis is materially misleading information provided during a land-use proceeding, violating **§54-3-1**, **§54-4-1**, and **§10-9a-509(1)** (accuracy in land-use submissions).

[Statute: Utah Code §§54-3-1, 54-7-25;
Evidence: Aug. 19 PC Meeting (01:09:01–01:09:09; 03:46:33–03:46:47);
Evidence: Oct. 16 Meeting (VP directive “we’re not exploring that”);
Document: Absence of Undergrounding Studies or Cost Analyses]

3. Misleading Statements Regarding Undergrounding Feasibility

Respondent stated:

“It’s not a feasible solution... building them underground isn’t feasible or reasonable.”
— Rita Ruderman, Planning Commission 01:09:18–01:09:32

This was misleading. Multiple 345 kV transmission lines, including in Chino Hills, California, have been successfully undergrounded at higher technical complexity than this project. Respondent’s categorical claims of infeasibility lacked any basis in data or engineering analysis.

Misrepresenting technical feasibility to influence public-process outcomes violates **§54-3-1**, **§54-4-1**, and applicable land-use accuracy standards.

[Statute: Utah Code §54-3-1;
Evidence: Aug. 19 PC Meeting (01:09:18–01:09:32);
Document: National Examples of 345 kV Underground Installations]

4. Misleading Use of Scientific Authority Regarding EMF

Respondent’s expert stated:

“None of them concluded that there is an adverse health effect associated with EMF at the levels we are experiencing in our daily lives.”
— Dr. Gabor Mezei, Planning Commission 01:21:47–01:22:10

This statement relied on instantaneous exposure guidelines (ICNIRP/ICES), which govern exposures of less than one-quarter of a second, not chronic residential exposure to 345 kV transmission lines including more than 3.0 μ T. The distinction is significant and was not disclosed, rendering the testimony materially misleading.

[Statute: Utah Code §§54-3-1, 54-4-1;
Evidence: Aug. 19 PC Meeting (01:21:47–01:22:10);
Document: Exponent Testimony Materials (instantaneous-exposure standards)]

C. Misleading Visual and Technical Information (Violations of Utah Code §§54-3-1 and 54-4-1)

Respondent's before-and-after visualizations were so zoomed out and widely framed that the structures were essentially invisible. The Planning Commission noted:

“Could you go back a slide and show where it was on West Mountain again?”
— Commissioner, Planning Commission (31:26–31:32)

Using graphics that obscure material impacts violates the utility's obligation to provide accurate and understandable project information.

[Statute: Utah Code §§54-3-1, 10-9a-509, 17-27a-508;
Evidence: Aug. 19 PC Meeting (12:17–12:35; discussion of difficulty seeing maps);
Document: Visual Renderings Submitted to Planning Commission]

D. Misrepresenting the Purpose of Public Involvement

After being asked about how they measure success, respondent plainly stated:

“Electricity flows at the end of the day, yeah I mean the lowest- the lowest cost.”
— Richard B., Oct. 16, 2025, 34:43–34:58

This statement minimized the statutory requirement under §54-18-201 to evaluate routes based on minimizing impacts—not merely minimizing cost. Statements that discourage participation or suggest predetermined outcomes violate Title 54 duties of fairness and transparency.

[Statute: Utah Code §§54-3-1, 54-4-1;
Evidence: Oct. 16, 2025 Meeting (34:49–34:56; “lowest cost”);
Document: Citizen Meeting]

SECTION III — PATTERN OF DECEPTION AND BAD-FAITH CONDUCT

The evidence establishes a sustained and deliberate pattern of false statements, contradictory representations, and selective disclosure. These contradictions span multiple meetings, written communications, and audiences. They show a utility that changes its story depending on who is listening and what outcome it seeks. This conduct reflects bad faith and undermines the integrity of public processes.

[Statute: Utah Code §§54-3-1, 54-7-25, 76-8-504;
Evidence: Combined Record of Aug. 19 & Oct. 16 Meetings, KUTV Broadcast, Citizen Email Exchanges;
Document: RMP 60-Day Notice, Affidavits, Fake Newspaper Notice, Newspaper Archives, Citizen Meeting]

A. Contradictory Statements on Affected-Landowner Status

At the Utah County Planning Commission, Respondent correctly stated:

“Affected landowners are within the corridor... 500 feet, which is 250 feet on each side of the center line.”
— Tami Moody, Planning Commission (03:37:49–03:38:32)

Yet when speaking to affected landowners two months later, Respondent stated:

“You’re not impacted, we’re not on your land.”
— Tami Moody, Oct. 16, 2025 meeting

Respondent further mischaracterized affected-landowner status:

“It would be a landowner... from whom we would need to obtain an easement... not neighboring landowners.”
— Rita Ruderman, Planning Commission (03:58:23–03:58:37)

These contradictions reveal a deliberate effort to expand the definition when speaking to regulators and contract it when speaking to citizens, depending on which definition was strategically beneficial. This is not confusion—it is narrative manipulation designed to suppress statutory rights.

B. Contradictory Statements on Whether Newspaper Notices Were Published

Respondent publicly stated:

“Information was also distributed through... the Salt Lake Tribune, the Deseret News, and the Daily Herald.”
— Tami Moody, Planning Commission (33:39–33:51)

Respondent told citizens directly that these notices had been published and sent a document it represented as the publication.

Respondent then told the media:

“Did publish notices in three different newspapers about the open houses.”

— RMP spokesperson, KUTV, Sept. 9, 2025

All of these statements were false. Respondent later admitted the notices were never published.

Contradictions of this magnitude—across public meetings, written correspondence, and broadcast television—demonstrate intentional deception rather than error.

C. Contradictory Statements on Federal Permitting (NEPA) Status

Respondent asserted, when attempting to avoid state-law obligations, that federal permitting was underway. Yet Respondent’s internal statements contradict that claim:

“They’ve not really given us any feedback.”

— Patricia Peterson, Oct. 16, 2025

“They’re in the process of getting into the permit application.”

— Richard B., Oct. 16, 2025

These statements confirm the absence of NEPA initiation. Respondent altered its description of federal permitting depending on which narrative supported its objective—minimizing obligations under state law.

D. Contradictory Statements on Undergrounding Feasibility and Cost

Respondent told the Planning Commission:

“Undergrounding can be... 15, 20 times as expensive.”

— Rita Ruderman, Planning Commission (01:09:01–01:09:09)

Respondent reaffirmed the claim when asked to clarify for a commission member:

“So I understand that burying lines is 20× in expense... right?”

— Commissioner, Planning Commission (03:46:33–03:46:47)

“So... yeah”

— Rita Ruderman, Planning Commission (03:46:33–03:46:47)

Yet Respondent internally admitted when referring to the notion of undergrounding:

“Our VP of Ops was like, we’re not exploring that, we’re not going to do that.”

— Richard B., Oct. 16, 2025

Respondent knew no study existed, no engineer had evaluated feasibility, and no cost estimate had been obtained. Nevertheless, Respondent presented a fixed multiplier to land-use officials to influence routing decisions.

Respondent further stated:

“It’s not a feasible solution... for a project of this size at this voltage, building them underground isn’t feasible or reasonable.”

— Rita Ruderman, Planning Commission (01:09:18–01:09:32)

This was misleading. Comparable 345 kV underground installations exist nationwide. Respondent ignored this evidence and instead presented categorical claims of infeasibility to advance its preferred route.

E. Contradictory Statements About the Nov 2025 Public Workshop

When Respondent needed to portray the October 16 workshop as a compliant workshop for regulatory purposes, it alluded to the meeting as a workshop in PSC filings. Yet when questioned by citizens, Respondent denied the meeting’s statutory status:

“These are not a requirement for anything... It’s not like a workshop.”

— Tami Moody, Oct. 16, 2025

This contradiction is not incidental. Respondent minimized the meeting’s statutory significance when speaking to citizens seeking to exercise their rights, but elevated its significance when reporting to regulators.

F. Misleading Scientific Statements Concerning EMF

Respondent’s EMF expert stated:

“None of them concluded that there is an adverse health effect associated with EMF at the levels we are experiencing in our daily lives.”

— Dr. Gabor Mezei, 01:21:47–01:22:10

This testimony relied on instantaneous-exposure standards (ICNIRP/ICES) applicable to fractions of a second, not chronic high-voltage exposure. Respondent did not disclose this distinction. This selective presentation of scientific information misled the public and land-use officials.

G. Misleading Visual Materials

Respondent provided “before and after” renderings of the proposed line that were zoomed out so far that the structures were essentially not visible. The Planning Commission noted:

“Could you go back a slide and show where it was on West Mountain again?”
— Commissioner, Planning Commission (31:26–31:32)

These visuals obscured the project’s true impact and exemplify Respondent’s pattern of controlling information in ways that reduce public awareness of the project’s consequences.

H. Statements Minimizing Successful Public Participation and Impact Mitigation

After being asked about how they measure success, respondent stated:

“Electricity flows at the end of the day, yeah I mean the lowest- the lowest cost.”
— Richard B., Oct. 16, 2025, 34:43–34:58

This statement contradicts §54-18-201, which requires minimizing impacts on communities—not merely minimizing cost. Respondent’s repeated suggestions that routing decisions were fixed and cost-driven discouraged public participation and concealed the true legal framework.

I. Pattern Summary

The record shows a utility that:

- Told landowners one definition of “affected landowner,” and regulators another;
- Told regulators that notices were published, while knowing they were not;
- Told citizens workshops were not required, while telling regulators they were;
- Asserted 20× undergrounding costs without any study;
- Claimed federal permitting had begun while acknowledging it had not;
- Misled the public with incomplete scientific references;
- Provided graphics designed to obscure impacts.

These contradictions, taken together, demonstrate intentional bad faith, not inadvertent mistake. They justify enhanced scrutiny, corrective orders, and discovery.

SECTION IV — NEED FOR DISCOVERY

Respondent's repeated contradictions, false statements, omissions, and selective disclosures create numerous material factual disputes. These disputes cannot be resolved without formal discovery. Discovery is necessary to determine what Respondent knew, when it knew it, and why it made statements to citizens, land-use authorities, media outlets, and this Commission that were inconsistent with its own internal knowledge.

Complainant respectfully requests that the Commission authorize discovery into the following categories of documents and information:

1. All internal and external communications concerning statutory notice requirements, including drafts, mailing lists, and correspondence relating to the 60-day notice and public workshop notice.
2. All materials related to Respondent's claim that newspaper notices were published, including drafts, proofs, emails to media outlets, and communications concerning the creation and distribution of the document sent to citizens purporting to be a published notice.
3. All undergrounding feasibility and cost materials, including engineering studies, cost analyses, emails, internal memoranda, and any documents or directives relating to the VP of Operations' decision to "not explore" undergrounding.
4. All communications with BLM or other federal agencies regarding NEPA, including any pre-application materials, responses, or discussions related to the SF-299 submission, scoping, or Notice of Intent preparation.
5. All routing analyses, alternatives considered, and internal impact evaluations, including any maps, diagrams, engineering assessments, or drafts that differ from the versions presented publicly.
6. All environmental or technical studies, including EMF modeling, wildlife assessments, wetlands evaluations, or related communications.
7. All versions of visual renderings or simulations, including any drafts that depict impacts more clearly than the versions presented to the Planning Commission.
8. All internal discussions regarding characterization of workshops, including whether they were treated internally as statutory workshops and instructions given to staff on how to describe them to citizens.
9. All internal communications regarding public participation strategy, including any discussion of affected-landowner classifications, terminology, or recommended talking points.

Given Respondent's contradictory record and repeated false statements, discovery is essential for the Commission to determine the truth and evaluate the full extent of Respondent's misconduct.

To the extent the Commission identifies any pleading deficiency, Complainant respectfully requests leave to amend.

[Statute: Utah Admin. Procedure, PSC Authority §§54-4-1, 54-7-17;
Evidence: Conflicting statements across Aug. 19 & Oct. 16 Meeting Records;
Document: All Exhibits Requested in Discovery Section]

SECTION V — REQUESTED REMEDIES

Complainant respectfully requests that the Commission order the following relief:

1. A finding that Respondent violated Utah Code §§54-18-301 and 54-18-302, including failures to notify affected landowners, failures to publish required notices, and failures to conduct lawful statutory workshops.
2. A finding that Respondent made materially false statements to land-use bodies, citizens, media outlets, and this Commission, in violation of Utah Code §§54-3-1, 54-7-25, and 76-8-504.
3. A finding that Respondent submitted misleading or incomplete information in land-use processes, in violation of Utah Code §§10-9a and 17-27a accuracy requirements.
4. An order compelling Respondent to issue corrected, statutorily compliant notices to all affected landowners, including those in the Salem Park Neighborhood.
5. An order requiring Respondent to conduct proper statutory workshops, with full compliance with location, timing, and publication requirements.
6. An order requiring Respondent to correct false statements previously made to the Utah County Planning Commission, the PSC, and the public, including statements about notice, affected-landowner status, and undergrounding feasibility. Including an order to publish these corrected statements on their project website.
7. An order requiring Respondent to disclose all technical, environmental, routing, and feasibility studies, including any drafts, omissions, and internal analyses.
8. A prohibition on Respondent repeating misleading claims concerning undergrounding feasibility or cost without proper engineering substantiation.
9. A requirement that Respondent produce all communications with federal agencies regarding NEPA, including the full record of any pre-NEPA discussions.
10. Initiation of a formal investigation into Respondent's pattern of deceptive conduct, false statements, and suppression of statutory rights.
11. Any penalties or sanctions authorized under Title 54 for failure to comply with statutory and regulatory duties.
12. Any additional relief the Commission deems necessary to protect landowners, ensure truthful public engagement, and maintain the integrity of the regulatory process.

[Statute: Utah Code §§54-18-301, 54-18-302, 54-3-1, 54-4-1, 54-7-25;
Evidence: Entire Record of Misstatements and Statutory Violations;

CONCLUSION

The record reflects pervasive misconduct by Respondent, including statutory violations, false statements to public bodies, misleading representations to citizens and the media, and contradictions in filings and testimony. Respondent shifted its narrative depending on the audience, suppressed statutory rights when inconvenient, and presented technical assertions unsupported by engineering analysis.

These actions violate multiple provisions of Utah law, undermine the integrity of public processes, and warrant Commission intervention. Complainant respectfully requests that the Commission evaluate the full extent of Respondent's conduct, authorize discovery, issue corrective orders, and grant the relief requested.

[Statute: All Cited Provisions;
Evidence: Totality of Aug. 19 & Oct. 16 Meeting Evidence + Media Evidence + Documentary Evidence;
Document: Entire Exhibit Set]