

Exhibit 4

Summary of Rocky Mountain Power Tariff Provisions and Misapplication

Purpose of Exhibit

To summarize the sections of Rocky Mountain Power (RMP) Electric Service Regulation No. 5 cited in the denial of Claims #7494434 and #7466814, and explain why these provisions do **not** apply to the type of damage experienced by the affected homes.

1. Tariff Language Cited by RMP

RMP referenced Electric Service Regulation No. 5, Section 2(a), stating:

“The customer shall provide devices to protect his/her equipment from high and low voltage, overload, single phasing, phase reversal or other abnormal conditions.”

RMP used this section to deny both claims, arguing that customers are responsible for protecting their equipment from abnormal voltage.

2. Why Regulation No. 5 Does Not Apply to This Incident

A. The damaged equipment cannot be protected by customer-installed devices

The components damaged—such as internal lighting switches, hardwired control devices, and other embedded systems—are not plug-in appliances. Surge protection devices available to residential customers **cannot** protect these internal system components.

Result: This tariff does not contemplate or obligate customers to protect internal wiring devices that have no engineered method of protection.

B. Two homes on the same transformer experienced simultaneous damage

Both Claim #7494434 and Claim #7466814 involve homes fed by the **same transformer**, and both experienced failures at the same moment.

Result: This pattern aligns with a **utility-side disturbance**, not with individual home wiring deficiencies or customer equipment failures.

C. Tariff limitations assume disturbances “beyond the company’s reasonable control”

The tariff limits liability for acts of God, lightning, or extraordinary conditions.

However, RMP has:

- **Provided no evidence** of a natural event
- **Provided no switching or protective device logs**
- Not demonstrated that the surge originated outside the utility’s system or control

Result: Without evidence of such a condition, RMP cannot rely on the limitation of liability clause.

D. RMP’s own tariff does not relieve it from investigating systemic failures

Regulation No. 5 does not absolve the utility of responsibility when:

- A distribution system failure occurs, or
- Multiple homes on the same transformer are simultaneously impacted

Result: The tariff does not apply as a blanket defense in multi-home surge incidents originating upstream.

3. Conclusion

RMP’s reliance on Electric Service Regulation No. 5 is **technically and procedurally inappropriate** because:

- The damaged equipment cannot be protected by customer-installed devices
- Multiple adjacent homes were affected simultaneously
- No evidence has been provided showing the cause was outside RMP’s system
- Tariff protections cannot be used without a factual basis demonstrating a utility-side investigation

Therefore, the tariff does not justify denial of the claims or refusal to disclose technical data.

ROCKY MOUNTAIN POWER
ELECTRIC SERVICE REGULATION
NO. 4 STATE OF UTAH

5. CONTINUITY OF SERVICE Unless otherwise specified in a service agreement, electric service is intended to be continuously available. It is inherent, however, that there will at times be some degree of failure, interruption, suspension, curtailment or fluctuations. The Company does not guarantee constant or uninterrupted delivery of Electric Service and shall have no liability to its Customers or any other persons for any interruption, suspension, curtailment or fluctuation in Electric Service or for any loss or damage caused thereby if such interruption, suspension, curtailment or fluctuation results from the following:

- (a) Causes beyond the Company's reasonable control including, but not limited to, accident or casualty, fire, flood, drought, wind, action of the elements or other acts of God, court orders, litigation, breakdown of or damage to facilities of the Company or of third parties, strikes or other labor disputes, civil, military or governmental authority, electric disturbances originating on or transmitted through electrical systems with which the Company's system is interconnected and acts or omissions of third parties.
- (b) Repair, maintenance, improvement, renewal or replacement of facilities, or any discontinuance of service which, in the Company's judgment, is necessary to permit repairs or changes to be made in the Company's generating, transmission or distribution facilities or to eliminate the possibility of damage to the Company's property or to the persons or property of others. To the extent practicable, such work, repairs or changes shall be done in a manner which will minimize inconvenience to the Customer and whenever practicable, the Customer shall be given reasonable notice of such work, repairs or changes.
- (c) Automatic or manual actions taken by the Company, which in its sole judgment are necessary or prudent to protect the performance, integrity, reliability or stability of the Company's electric system or any electrical system with which it is interconnected. Such actions shall include, but shall not be limited to, the operation of automatic or manual protection equipment installed in the Company's electrical system, including, without limitation, such equipment as automatic relays, generator controls, circuit breakers and switches

Exhibit 5

Technical Explanation of the Limitations of 15-Minute Interval Voltage Data

Purpose of Exhibit

To explain why the 15-minute interval voltage data provided by Rocky Mountain Power (RMP) cannot detect, characterize, or rule out the type of electrical surge that damaged equipment in the affected homes.

1. Surge Events Occur in Microseconds or Milliseconds

Electrical surges typically last:

- **Microseconds (μs)** or
- **Milliseconds (ms)**

A typical 15-minute interval contains **900,000 milliseconds**, meaning the meter averages voltage over a period more than **900,000 times longer** than the surge duration.

Result:

A momentary damaging spike is mathematically invisible in the 15-minute average data.

2. Smart Meters Record Averages, Not Extremes

RMP's smart meters produce **average RMS voltage values** for each 15-minute period. They do **not** capture:

- Maximum or minimum instantaneous voltage
- Rapid voltage swings
- Transient peaks
- High-frequency disturbances
- Harmonic distortions associated with surge events

Result:

Even a large surge strong enough to destroy electronics will not significantly affect a 15-minute average voltage reading.

3. Surge Damage Is Caused by Instantaneous Peaks, Not Average Voltage

Surge events are defined by:

- Very high **instantaneous peak voltages**
- Rapid rise and fall times
- Short-duration transient energy

Detecting these requires **high-speed power quality monitoring equipment**, such as:

- Waveform event recorders
- Fault recorders
- Substation relay logs
- High-resolution SCADA captures

Residential smart meters **do not** have this capability.

4. Industry Standards Recognize These Limitations

Standards such as:

- **IEEE 1159 (Power Quality Monitoring)**
- **IEEE C62 Series (Surge Protection)**
- **IEC 61000 (Electromagnetic Compatibility)**

all recognize that **surges cannot be detected or evaluated using low-resolution interval data.**

Result:

RMP's 15-minute logs are not a valid tool for determining whether a surge occurred.

5. Conclusion

Because a damaging surge:

- Occurs in microseconds or milliseconds
- Is averaged out in 15-minute RMS readings
- Requires specialized high-speed equipment to detect

- Does not appear in interval voltage logs

the 15-minute interval data provided by RMP cannot confirm or rule out the occurrence of a surge and cannot be used as the basis for denying a surge-related damage claim.

Exhibit 6

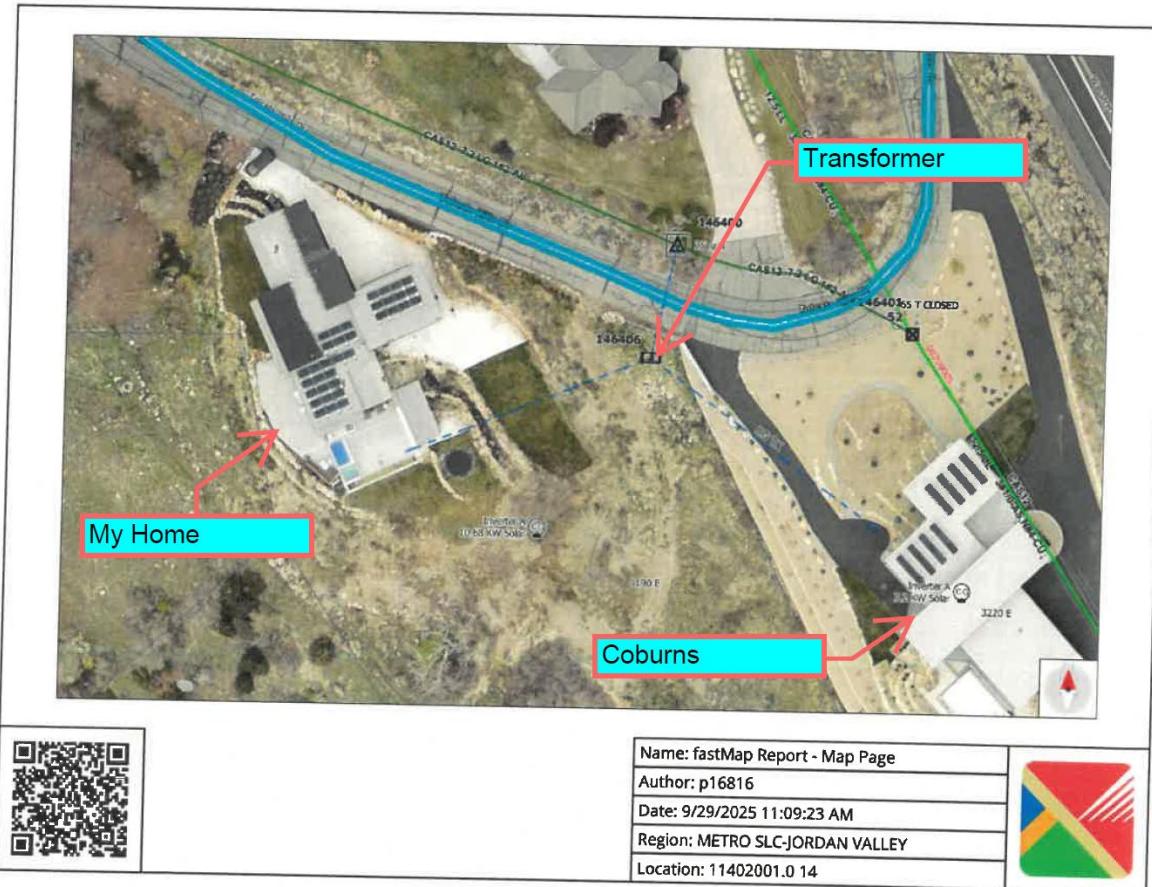


Exhibit 7

Timeline of Events Related to Surge Incident & Claims

Purpose of Exhibit

To provide the Utah Public Service Commission a clear chronology of the surge event, the associated damage, and subsequent claim and investigation activities involving both homes.

Key Events Timeline

August 22, 2025 – Surge Event Occurs

- A sudden electrical event impacts both residences:
 - **3190 E Tolcate Hills Drive** – Claim #7494434
 - **3220 E Tolcate Hills Drive** – Claim #7466814
 - **Multiple other addresses noted damage** – After going through this process, I now understand why they didn't file claims, though I have email correspondence from at least 2 additional HOA members stating issues occurring at the same time.
- Damage occurs simultaneously, affecting hardwired electrical components (switches, controls, etc.) and solar-related systems at the Coburn residence.
- No outage or other service notification is issued by RMP.

Following Days – Damage Assessment

- Both homes identify equipment failures consistent with an upstream voltage disturbance.
- Repairs are postponed pending clarification from RMP on liability.

Initial Claim Filing

- Both homeowners submit claims to Rocky Mountain Power.
- RMP acknowledges receipt and begins reviewing the claims.

RMP Issues Initial Denial Letters

- Both claims are denied.
- RMP incorrectly attributes your claim's damage to solar generation issues (even though your home has **no solar-related damage**).
- RMP states customers must protect equipment per Tariff No. 5.

Customer Follow-Up

- You contact RMP Claims and Customer Advocacy to clarify inaccuracies.

- RMP acknowledges the solar reference was incorrect and **removes it** from your denial.
- However, RMP still denies the claim **without providing technical findings**.

Neighbors Confirm Shared Transformer

- A transformer diagram provided by RMP confirms both homes are served by the **same transformer**.
- This establishes the event as a likely **utility-side disturbance**, not isolated customer equipment issues.

RMP Provides 15-Minute Voltage Interval Data

- RMP supplies only low-resolution voltage logs.
- No switching logs, SCADA data, or protection device operations are provided.
- RMP asserts no surge occurred based solely on interval voltage readings.

Customer Rebuttal

- You inform RMP that 15-minute interval data cannot detect transient surge events.
- You request technical records; none are provided.

Complaint Submitted to the Utah Division of Public Utilities

- DPU conducts an informal review.
- DPU concludes the issue cannot be resolved informally.

Referral to the Utah Public Service Commission

- DPU advises filing a **Formal Complaint**.
- Both you and the Coburns proceed with coordinated filings.

Summary

This timeline demonstrates:

- A coordinated multi-home disturbance
- Insufficient investigation by RMP
- Inaccurate application of tariff provisions
- Failure to supply required technical records
- Basis for PSC review of RMP's handling of the event