

ADDITIONAL INFORMATION – SUPPORTING FACTS

1. Historic Status and Restrictions

The home at 931 East First Avenue was built in 1898 and is treated as a historic structure. Any changes to the exterior—including deck alterations, movement of visible service equipment, or changes that materially affect the façade—may require review and approval from the appropriate Historical Commission or governing body. This significantly limits my ability as a homeowner to make unilateral changes in response to Rocky Mountain Power's demands.

2. Utility-Installed Infrastructure and Approved Permits

All equipment and service lines at issue were installed by Rocky Mountain Power (or its predecessor, Utah Power) prior to my ownership of the property more than 24 years ago. The electrical work has been reviewed and approved by the City at least twice, including a City-approved remodel permit electrical in 1998 and documentation from 1936 electrical as well. I have not altered or modified the utility's original design or placement.

3. Property Topography and Easement Context

My property sits noticeably lower than the rear neighbor's parcel, which appears to be a major factor in why the line now hangs lower over the neighbor's corner. This is a condition inherent to the site and known (or knowable) to the utility at the time of installation. I have been advised by the Title Company that a prescriptive easement exists over the area in question, reflecting the long-standing presence and use of the line. 24+years

4. Occupancy, Health, and Safety Concerns

My son resides at the property as his legal residence and primary home base. He travels periodically for work, but the home remains occupied. During this dispute, outside temperatures have been in the 30s. Any threat to disconnect electrical service under these conditions poses a direct risk to health, safety, and habitability.

5. Communication History and Utility Conduct

Rocky Mountain Power representatives have repeatedly failed to provide adequate written responses to my reasonable questions, including those in my letter dated October

31, 2025. I received verbal threats of disconnection, When I filed an informal complaint with the Utah Public Service Commission, a liaison stated that the company “will not do anything that costs them money,” and that I would be calling him, for help, further underscoring the need for regulatory review and intervention.