

April 6, 2026

***VIA ELECTRONIC FILING***

Utah Public Service Commission  
Heber M. Wells Building, 4<sup>th</sup> Floor  
160 East 300 South  
Salt Lake City, UT 84114

Attention: Gary Widerburg  
Commission Administrator

**Re: Docket No. 26-035-10 – Formal Complaint of Mark Hopkins on behalf of  
Central Park, LLC against Rocky Mountain Power**  
*Answer and Motion to Dismiss*

Pursuant to the Notice of Filing and Comment Period issued by the Public Service Commission of Utah on March 10, 2026, Rocky Mountain Power (“Company”) hereby submits for filing its Answer and Motion to Dismiss in the above referenced matter.

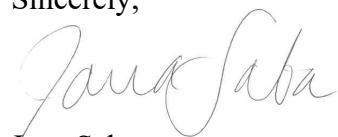
The Company respectfully requests that all formal correspondence and requests for additional information regarding this filing be addressed to the following:

By E-mail (preferred): [datareq@pacificorp.com](mailto:datareq@pacificorp.com)  
[max.backlund@pacificorp.com](mailto:max.backlund@pacificorp.com)  
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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 [max.backlund@pacificorp.com](mailto:max.backlund@pacificorp.com).

Sincerely,



Jana Saba  
Director, Regulation and Regulatory Affairs

**CERTIFICATE OF SERVICE**

Docket No. 26-035-10

I hereby certify that on April 6, 2026, 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](mailto:mbeck@utah.gov)  
[ocs@utah.gov](mailto:ocs@utah.gov)

**Division of Public Utilities**

[dpudatarequest@utah.gov](mailto:dpudatarequest@utah.gov)

**Assistant Attorney General**

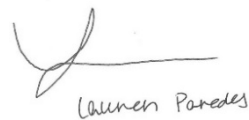
Patricia Schmid [pschmid@agutah.gov](mailto:pschmid@agutah.gov)  
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**Complainant**

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**Rocky Mountain Power**

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*Attorney for Rocky Mountain Power*

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

Formal Complaint of Mark Hopkins on behalf of Central Park, LLC against Rocky Mountain Power	DOCKET NO. 26-035-10  <b>ANSWER AND MOTION TO DISMISS</b>
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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 Mark Hopkins on behalf of Central Park, LLC (“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 sought.

Communications regarding this Docket should be addressed to:

By e-mail (preferred):

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### **BACKGROUND AND ANSWER TO COMPLAINANT’S ALLEGATIONS**

1. Complainant is a customer of Rocky Mountain Power and owns Central Park, LLC which is a mobile park home in Price, Utah (the “Property”) located at the service address listed in the formal complaint filing submitted by Complainant on March 6, 2026 (“Complaint”).

2. Between October 23, 2025 and October 28, 2025, Complainant contacted the Company, requesting the Company’s assistance in disconnecting meters at four different locations on the Property to allow him to upgrade the meter bases. Upgrading the meter bases on the Property requires the Company to disconnect the service to the meter, then reconnect the service after the new meter bases are installed.

3. In response to Complainant’s request, a Company representative met with the Complainant’s electrician at the Property to discuss Complainant’s requests. Upon inspecting the underground lines connected to the meters, the Company determined that Complainant’s underground service was not compliant with the National Electric Safety Code and the Company’s safety requirements

because the lines were not installed in conduit.<sup>1</sup>

4. The Company representative explained to Complainant's electrician that service can be disconnected. However, to reconnect the service, the equipment would need to be updated to current safety code, which includes installing conduit.

5. Rocky Mountain Power Electric Service Regulation No. 5(1)(c) states that Complainant's "wiring, meter bases, and service entrance facilities must be installed and maintained by the Customer in accordance with applicable municipal or state requirements and to standards required by the National Electric Safety Code and National Electric Code." Therefore, Complainant is responsible for the costs of bringing the lines attached to his meter base up to the Company's safety requirements, which the Company's representative explained to Complainant's electrician.

6. The Company representative left the Property without performing any work, and the Complainant never contacted the Company to move forward with the project.

7. On February 19, 2026, Complainant filed an Informal Complaint with the Division of Public Utilities ("DPU") requesting the ability to upgrade meters bases on the Property without installing conduit. Complainant contends the existing lines "are in good shape and function perfectly, should be grandfathered in and we should not be forced to update Rocky Mountain Power's infrastructure."<sup>2</sup>

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<sup>1</sup> PacifiCorp, *Electric Service Requirements* (R1 2024), Section 5.2 (Conduit Requirements): "All underground service conductors shall be installed in conduit. The Power Company will install the underground cable from the Peor Company's source to the service point. The customer is responsible for ensuring that all conduit complies with Power Company requirements." (Effective Jan. 1, 2025; published Nov. 20, 2024).

<sup>2</sup> *Formal Complaint of Mark Hopkins on behalf of Central Park, LLC against Rocky Mountain Power*, Docket No. 26-035-10, Formal Complaint, Attachment A – Informal Complaint, at 2 of 5 (March 6, 2026).

8. The Company explained to the DPU that the work Complainant requested requires installation of conduit for the new service connection. The Company also explained that in accordance with its safety requirements, the Customer is responsible for providing all trenching, backfilling, and conduit.

9. On February 24, 2026, the DPU closed the Informal Complaint.

10. On March 6, 2026, Complainant filed the Complaint with the Commission, requesting the Company fulfill Complainant's disconnect and reconnect requests to upgrade Complainant's meter bases on the Property. Complainant also alleged the Company previously disconnected and reconnected without upgrading the infrastructure in the past.

#### **MOTION TO DISMISS**

11. 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 violated any applicable law, Commission rule, or Company tariff for which relief can be granted.

12. In the Complaint, Complainant alleged a Company employee previously disconnected service to Complainant's meters and reconnected service without the requisite upgrades to previously installed infrastructure.

13. According to Company records, this is an inaccurate statement. The Company has no records of Company employees disconnecting service and reconnecting service to newly installed meter bases without upgrading necessary equipment in accordance with Company safety standard.

14. Complainant alleges the Company is “using their ability to disconnect and reconnect to force [Complainant] to upgrade [Complainant’s] infrastructure at a huge expense, which ultimately means at the tenant’s expense.”<sup>3</sup>

15. The Company cannot reconnect service to infrastructure that is not up to current safety standards. When the Company representative visited the site and met with the electrician, the Company did not state the project could not be done. Rather, the Company was notifying the Complainant’s electrician of expectations for completing the project to bring the infrastructure up to code and upgrade the meter base.

16. The Company is still willing to disconnect and reconnect service to enable Complainant to upgrade his meter bases. However, reconnecting service will require upgrading infrastructure in accordance with Company safety standards and Rocky Mountain Power Electric Service Regulations No. 12(2)(f), which provides that Complainant is responsible for costs associated with trenching, backfilling, and installing conduit.

17. In the Complaint, Complainant expresses disinterest in paying the costs associated with upgrading the underground equipment to current safety standards. However, Complainant fails to provide evidence that the Company violated any provision of law, Commission order or rule, or Company tariff.

18. The Company requests the Commission dismiss the Complaint with prejudice because Complainant has failed to show the Company violated any provision of law, Commission order or rule, or Company tariff for which relief can be granted.

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<sup>3</sup> *Formal Complaint of Mark Hopkins on behalf of Central Park, LLC against Rocky Mountain Power*, Docket No. 26-035-10, Formal Complaint, at 3 of 4 (March 6, 2026).

## CONCLUSION

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

Dated this 6<sup>th</sup> day of April 2026,

ROCKY MOUNTAIN POWER



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