

April 8, 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. 26-035-14 – Formal Complaint of Farhood Samimi 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 11, 2026, Rocky Mountain Power (“Company”) hereby submits for filing its Answer and Motion to Dismiss in the above referenced matter. Confidential Attachments A and B have been uploaded to the Commission’s SFTP site and are provided in accordance with Commission Rule R746-1-602 and 603.

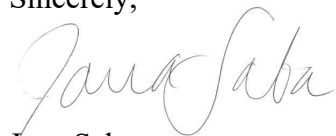
The Company respectfully requests that all formal correspondence and requests for additional information regarding this filing be addressed to the following:

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

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

Katherine Smith (18823)  
Rocky Mountain Power  
1407 West North Temple, Suite 320  
Salt Lake City, Utah 84116  
Telephone No. (435) 776-6980  
[katherine.smith@pacificorp.com](mailto:katherine.smith@pacificorp.com)

*Attorney for Rocky Mountain Power*

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

Formal Complaint of Farhood Samimi against Rocky Mountain Power	DOCKET NO. 26-035-14 <b>ANSWER AND MOTION TO DISMISS</b>
---	---

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 Farhood Samimi (“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 granted.

Communications regarding this Docket should be addressed to:

By e-mail (preferred):

[datareq@pacificorp.com](mailto:datareq@pacificorp.com)  
[katherine.smith@pacificorp.com](mailto:katherine.smith@pacificorp.com)  
[max.backlund@pacificorp.com](mailto:max.backlund@pacificorp.com)

By mail:

Data Request Response Center  
Rocky Mountain Power  
825 NE Multnomah St., Suite 2000  
Portland, OR 97232

Max Backlund  
Rocky Mountain Power  
1407 W North Temple, Suite 310  
Salt Lake City, UT 84116  
Telephone: (801) 220-3121

Katherine Smith  
1407 West North Temple, Suite 320  
Salt Lake City, Utah 84116  
Telephone: (435) 776-6980

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

1. Complainant is a residential customer of Rocky Mountain Power, taking service under Electric Service Schedule No. 1 at the service address listed in the formal complaint filing submitted by Complainant on March 10, 2026 (“Complaint”).

2. On January 26, 2026, Complainant filed an Informal Complaint with the Division of Public Utilities (“DPU”). In the Informal Complaint, Complainant expressed concern over being overcharged for his electricity bill but did not specify how he’s being overcharged.<sup>1</sup>

3. On January 27, 2026, a Company representative reached out to Complainant to discuss how his bill is determined, which is based on the kilowatt hour (“kWh”) usage tracked by his meter.

4. On January 28, 2026, Complainant reached out to the Company again, expressing his concerns with his meter. The same day, a Company representative spoke with Complainant again and explained that Complainant’s usage is higher in winter months likely in response to colder temperatures.

---

<sup>1</sup> *Formal Complaint of Farhood Samimi against Rocky Mountain Power*, Docket No. 26-035-14, Formal Complaint, Attachment A-Informal Complaint (March 10, 2026).

5. Complainant also explained concern with how his bills are portrayed on the Company's website. In response to Complainant's concerns, the Company offered to check with the Company's business technology group and offered to perform a meter test. Complainant accepted the Company's offers.

6. On January 29, 2026, the DPU resolved Complainant's Informal Complaint.

7. On January 30, 2026, the Company tested Complainant's meter. The meter tested within accuracy range, at 100.09 weighted average. The Company's accepted range for meter tests is two percent, per Commission-approved, Electric Service Regulation No. 7 (3) – Meter Tests. Therefore, Complainant's meter test was well within the acceptable range.<sup>2</sup>

8. According to Company records, Complainant spoke with the Company representative who performed the meter test in person, who explained the meter test to Complainant.

9. After completing the meter test, a Company representative called Complainant and left a voicemail, explaining that the meter test results were within normal range and that his online bills were accurately reflected.

10. On March 10, 2026, Complainant filed the Complaint, alleging the Company charges for electricity consumption as high as possible, which the Complainant believes to be illegal and fraudulent. Complainant requests the Company charge the real expense and not an inflated expense.<sup>3</sup>

---

<sup>2</sup> Confidential Attachment A – Meter Test Results.

<sup>3</sup> *Formal Complaint of Farhood Samimi against Rocky Mountain Power*, Docket No. 26-035-14, Formal Complaint (March 10, 2026).

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

12. In the Complaint, Complainant alleged the Company charges an inflated cost for Complainant's electricity consumption.

13. The Company charges its customers, including Complainant, based on customers' energy usage. The Company charges Complainant for Complainant's kWh energy usage, as tracked by Complainant's meter. The Company tested Complainant's meter on January 29, 2026, the results of which were well within the acceptable range and in accordance with Commission-approved ESR 7(3). Therefore, the Company believes it is accurately charging Complainant based on his energy usage.

14. The Company provides examples of Complainant's usage and billing history as Confidential Attachment B – Usage and Billing Analysis, to reflect the Company's evidence that is it correctly charging Complainant in accordance with its applicable tariffs.

15. The Commission should dismiss this Complaint with prejudice, as Complainant fails to allege or explain in the Complaint how or when the Company incorrectly charged Complainant. The Commission has previously dismissed formal complaints with prejudice when complainants failed to identify any inaccuracy in their bill or otherwise made any allegation to

support their Complaint.<sup>4</sup> Here, the Company believes Complainant failed to identify or specify any inaccuracy in Complainant's bill, similar to Docket No. 21-035-43.

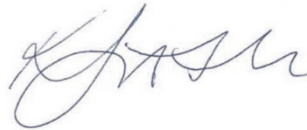
16. The Company requests the Commission dismiss the Complaint with prejudice because Complainant has failed to show the Company violated any provision of law, Commission order or rule, or Company tariff for which relief can be granted.

### CONCLUSION

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

Dated this 8<sup>th</sup> day of April 2026,

ROCKY MOUNTAIN POWER



---

Katherine Smith (18823)  
1407 West North Temple, Suite 320  
Salt Lake City, Utah 84116  
Telephone No. (435) 776-6980

*Attorney for Rocky Mountain Power*

---

<sup>4</sup> *Formal Complaint of Erin and Geromie Clavell against Rocky Mountain Power*, Docket No. 21-035-43, Order Dismissing Complaint (Sept. 9, 2021).

**CERTIFICATE OF SERVICE**

Docket No. 26-035-14

I hereby certify that on April 8, 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**

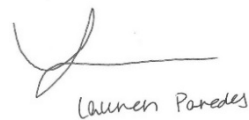
Patricia Schmid [pschmid@agutah.gov](mailto:pschmid@agutah.gov)  
Robert Moore [rmoore@agutah.gov](mailto:rmoore@agutah.gov)  
Patrick Grecu [pgrecu@agutah.gov](mailto:pgrecu@agutah.gov)

**Complainant**

Farhood Samimi [nwappraisers@yahoo.com](mailto:nwappraisers@yahoo.com)

**Rocky Mountain Power**

Data Request Response Center  
Jana Saba [jana.saba@pacificorp.com](mailto:jana.saba@pacificorp.com)  
[utahdockets@pacificorp.com](mailto:utahdockets@pacificorp.com)  
Max Backlund [max.backlund@pacificorp.com](mailto:max.backlund@pacificorp.com)  
Katherine Smith [Katherine.smith@pacificorp.com](mailto:Katherine.smith@pacificorp.com)



Lauren Paredes

---

Lauren Paredes  
Coordinator, Regulatory Operations

CONFIDENTIAL ATTACHMENTS A & B  
ARE CONFIDENTIAL IN THEIR ENTIRETY AND ARE  
PROVIDED UNDER SEPARATE COVER