

# OBJECTION TO COMPANY'S ANSWER

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2023 AUGUST 8, 2023 8:00AM  
IDAHO PUBLIC  
UTILITIES COMMISSION

To: Jan Noriyuki, Commission Secretary  
Idaho Public Utilities Commission  
PO Box 83720  
Boise, ID 83720-0074

Date: August 7, 2023

From: Samuel and Peggy Edwards  
333 Shoshone Ave  
Rexburg, Idaho 83440

RE: Objection to Rocky Mountain Power's "Answer to Petition for Reconsideration", Idaho Public Utilities Commission Final Order of Case ID "PAC-E-23-05"

Dear Ma'am,

I ask the Commission's indulgence for a brief summary note. ROCKY MOUNTAIN POWER/PACIFICORP ("Company") has written an "Answer to Petition for Reconsideration" which misconstrues my Petition as not complying with Rule 331 of the Rules of Procedure of the Idaho Public Utilities Commission. The Company claims that I failed to "provide sufficient reasoning as to why Order No. 35849 is unreasonable or unlawful, and the Petitioners have not presented any new evidence..."

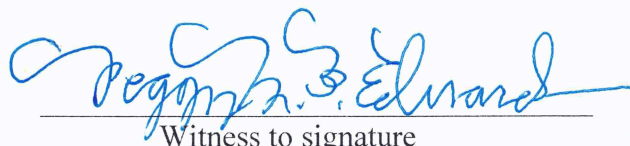
In order to avoid confusion, I would briefly summarize that our Petition of July 28, 2023 offered new evidence that advanced metering infrastructure (AMI) meters include a capability *downgrade*, that 100% compliance is *unreasonable*, and that allowing ROCKY MOUNTAIN POWER/PACIFICORP to disconnect our electric service is *not lawful*. My question regarding the lawfulness of the Commission's order is grounded upon our objection to the Company's replacement of our meter with an inferior metering technology, which is not a covered purpose for meter access under Electric Service Regulation (ESR) 6(2)(d). Utility Customer Relations Rules (UCRR) 302 defines the conditions for termination of Service and is not enforceable if the purpose of Company access to the meter does not comply with ESR 6(2)(d). ESR 7(1), also cited in Order No. 35849, applies to installation of meters, and the Company's responsibility to maintain the meter cannot give the Company sole discretion to replace it with any technology (even inferior) without Customer approval.

Please protect the minority of ROCKY MOUNTAIN POWER/PACIFICORP's customers and the public by reconsidering the lawfulness of your order that effectively mandates AMI meter installations in Idaho.

Respectfully,



Samuel Z. Edwards, Sui Juris



Witness to signature