

FORMAL COMPLAINT

CASE NO. PAC-E-23-07

Jan Noriyuki, Commission Secretary

Idaho Public Utilities Commission

PO Box 83720

Boise, ID 83720-0074

Date: March 24, 2023

From: Karen Lane

PO Box 362

Rigby, ID 83442

RE: Installation of "Smart" Meter and threat of service disconnection

Dear Ma'am,

This FORMAL COMPLAINT is a follow-up to an initial complaint which i, Karen Lane submitted to Idaho Public Utility Commission on March 20,2023. I have received from Rocky Mountain Power a FINAL NOTICE of intent to terminate service on March 27, 2023. Rocky Mountain's notice claims that we have refused access to the meter. On the contrary, we solemnly affirm that at no time has access to the meter been denied, and the claim by Rocky Mountain Power that we have is knowingly and intentionally false. To be clear: at no time have we prevented Rocky Mountain Power from accessing the existing meter attached to our home for any purpose, and our account is paid in full and up to date.

What we *have* done is require that the meter--which is attached to our house--remain a meter that does not emit radio wave frequencies. We have concerns about such meters, on physical health grounds as well as legal privacy concerns. To date, Rocky Mountain has refused to address the issue or enter into a dialogue with us in good faith. Instead, Rocky Mountain Power has resorted to bullying and strong-arm techniques to try to force us to accept a so-called "smart meter" attached onto our private property without our consent.

However, *having objections to installation of a particular type of meter, a so-called "smart meter," is NOT legal grounds for disconnecting our current electrical service.* This is crucial legal fact that has been ignored both by Rocky Mountain Power and by Idaho Public Utilities Commission's Utilities Compliance Investigator, Chris Hecht, who cited Electric Service Regulation No. 6 as Rocky Mountain Power's authority to threaten to terminate our electrical service.

Electric Service Regulation No. 6 says, "The Customer shall provide safe, unencumbered access to Company's representatives at reasonable times, for the purpose of reading meters, inspecting, repairing, or removing metering devices and wiring of the Company." We have done precisely that. At no time have we denied access to the meter. As we have always provided the required access, neither Electric Service Regulation No. 6 nor IDAPA 31.21.01, Rule 302.01.e apply to our case, and Rocky Mountain Power does not have legal authority to terminate our electrical service on those grounds.

If there is a law or regulation that specifically authorizes termination of electrical service for objecting to the installation of a smart meter in the place of an analog meter, we respectfully request that it be shown to us. Otherwise, because we have never denied access to the meter, we respectfully request that the Idaho Public Utilities Commission intervene to prevent Rocky Mountain Power from unlawfully disconnecting our electrical service and to require Rocky Mountain Power to engage in respectful, good faith dialogue with us about an acceptable solution that addresses our concerns.

Respectfully,

Karen Lane

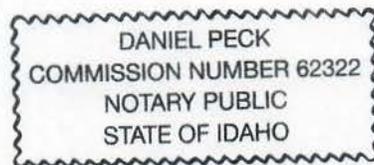
Signature _____



State of Idaho, Jefferson County

The foregoing instrument was acknowledged before me on this 3/25/23 by

DANIEL PECK



Signature of Notary Public _____



COUNTY OF JEFFERSON, STATE OF IDAHO
EXPIRATION DATE 9/27/25