

**RECEIVED**

MAR 13 2024 8:21A

**SUPREME COURT  
IN THE SUPREME COURT OF APPEALS OF THE STATE OF IDAHO**

**Sam and Peggy Edwards**

Complainants-Appellants,

vs.

**PACIFICORP, dba ROCKY MOUNTAIN  
POWER**

Respondent.

Supreme Court Docket No. 51238-2023

Public Utilities Commission No.  
PAC-E-23-05

**MOTION FOR LEAVE TO FILE  
AMICUS CURIAE BRIEF**

---

ON APPEAL FROM THE IDAHO PUBLIC UTILITIES COMMISSION  
OF THE STATE OF IDAHO

---

COMMISSION PRESIDENT, ERIC ANDERSON, PRESIDING

---

Sam and Peggy Edwards  
333 Shoshone Ave  
Rexburg, Idaho 83440  
Complainants-Appellants

MARK ADLER  
1407 West North Temple, Suite 330  
Salt Lake City, Utah 84116  
*Attorney for ROCKY MOUNTAIN POWER*

JOE DALLAS  
825 NE Multnomah, Suite 2000  
Portland, OR 97232  
*Attorney for PACIFICORP*

ADAM TRIPLETT, ISB #10221  
11331 W. Chinden Blvd., Bld. 8, Ste. 201-A  
Boise, Idaho 83704  
*Attorney for IDAHO PUBLIC  
UTILITIES COMMISSION*

Comes now, Frits van Mastrikt, hereinafter *Amicus*, the son of Jacoba H. van Mastrikt who, like Complainants-Appellants Sam and Peggy Edwards was one of the original six Complainants who filed COMPLAINTS with the IDAHO PUBLIC UTILITIES COMMISSION against ROCKY MOUNTAIN POWER Company concerning the attempted installation of an AMI meter (more commonly known as a smart meter) on their home(s).

*Amicus* motions this Court for leave to file an AMICUS CURIAE brief (see attached) in support of Complainants-Appellants Sam and Peggy Edwards.

As this case concerns matters of broad public interest, *Amicus* wishes to add clarification to the critical points of law and evidence previously brought up by Sam and Peggy Edwards in their original COMPLAINT and NOTICE OF APPEAL to the IDAHO PUBLIC UTILITIES COMMISSION, as well as introduce matters of great Constitutional concern and relevance to this case which were not included and brought forth in said COMPLAINT and NOTICE OF APPEAL, matters that should concern every electric power customer in Idaho, as well as throughout America.

Further, *Amicus* has a compelling interest to, 1) not allow undue harm to come to himself, 2) not allow undue harm to come to his 100-year old mother, Jacoba H. van Mastrikt, who is also facing threat of termination of electric power service, and 3) support and advance those principles of law and justice which actively protects the Rights, health, and private property of not only Sam and Peggy Edwards, but of *Amicus*'s mother, Jacoba H. van Mastrikt, and those similarly situated, and the people of Idaho as well.

///

Dated this 11<sup>th</sup> day of March, 2024.

Respectfully submitted,

Frits van Mastrigt,  
c/o 3270 E. 17<sup>th</sup> Street #128.  
Idaho Falls, Idaho [83406]  
650-759-3944 (telephone)  
groundsurround@proton.me



---

Frits van Mastrigt, Sui Juris

## CERTIFICATE OF SERVICE


I HEREBY CERTIFY that I, Frits van Mastrigt did personally insert the following document into a United States Postal Service PRIORITY MAIL envelope with proper postage (Tracking No.: 9510 8140 1798 4071 5067 30), and mailed said document Certified Mail with Signature Required, through the United States Postal Service:

**1. Motion For Leave to File Amicus Curiae Brief, dated March 11, 2024.**

to the following address:

Idaho Supreme Court  
Clerk's Office  
P.O. Box 83720  
Boise, Idaho 83720-0101

on this 11<sup>th</sup> day of March, 2024



---

Frits van Mastrigt  
c/o 3270 E. 17<sup>th</sup> Street #128.  
Idaho Falls, Idaho [83406]  
650-759-3944 (telephone)  
groundsurround@proton.me