COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

CHARLOTTE RING,

COMPLAINANT

vs.

NO. 93-312

UNION LIGHT, HEAT & POWER, DEFENDANT

<u>COMPLAINT</u>

The complaint of Charlotte Ring respectfully shows: a) Charlotte Ring, unemployed, resides at 1228 Scott Street, Apartment 4, Covington, Kentucky 41011;

b) The Defendant is the Union Light, Heat and Power Company (ULH&P), 107 Brent Spence Square, Covington, Kentucky 41011;

c) That in August of 1993 Complainant requested gas and electric service from ULH&P but was denied service until she paid a security deposit of \$105.00 and agreed to pay a bill owed to the Cincinnati Gas and Electric Company in the amount of \$1353.93 for service rendered to her at 2212 Eastern Avenue, 3rd Floor, Cincinnati, Ohio in 1989;

d) That Charlotte Ring admits being indebted to the Cincinnati Gas and Electric Company;

e) That Charlotte Ring is not indebted to ULH&P;

f) That ULH&P's refusal to provide service to Charlotte Ring when she is not indebted to ULH&P is a violation of Kentucky P.S.C. Regulations, 807 KAR 5:006, Section 14(1) and KRS 278.030;

RECEIVED

AUG 3 0 1993

PUBLIC SERVICE COMMISSION WHEREFORE, Complainant Charlotte Ring asks:

1. That the PSC assume jurisdiction of this billing dispute and, pursuant to 807 KAR 5:006, Section 11, order ULH&P to cease refusing service during the pendency of this case;

2. That the PSC order ULH&P to refrain from collecting debts owed to other companies.

Dated at Covington, Kentucky this 26 day of Allery,

CHARLOTTE RING COMPLAINANT

CARL / MELCHER ATTORNEY FOR COMPLAINANT Northern Kentucky Legal Aid Society, Inc. 302 Greenup Street Covington, Kentucky 41011 (606) 431-8200

ANTHONY G. MARTIN CO-COUNSEL FOR COMPLAINT Office of Kentucky Legal Services Programs 201 West Short Street, #506 Lexington, Kentucky 40507

11

h