

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

SOUTH WILLIAMSON LODGING, INC.)	
(FORMERLY WILLIAMSON SUPER 8)	
MOTEL, INC.))	
)	
COMPLAINANT)	
)	
v.)	case no. 94-066
)	
LITTLE PEARL TRUCKING COMPANY, INC.;)	
MOSES LOWE; DENNY MOORE; SOUTHSIDE)	
REAL ESTATE DEVELOPERS, INC.; and)	
RELIANCE REALTY, INC.)	
)	
DEFENDANTS)	

ORDER TO SATISFY OR ANSWER

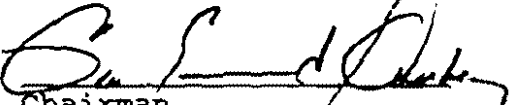
Little Pearl Trucking Company, Inc., Moses Lowe, Denny Moore, Southside Real Estate Developers, Inc., and Reliance Realty, Inc. ("Defendants") are hereby notified that they have been named as defendants in a formal complaint filed on February 14, 1994, a copy of which is attached hereto.

Pursuant to 807 KAR 5:001, Section 12, Defendants are HEREBY ORDERED to satisfy the matters complained of or file a written answer to the complaint within 10 days from the date of service of this Order.

Should documents of any kind be filed with the Commission in the course of this proceeding, the documents shall also be served on all parties of record.

Done at Frankfort, Kentucky, this 17th day of March, 1994.

PUBLIC SERVICE COMMISSION


Chairman


Vice Chairman


Commissioner

ATTEST:


Executive Director

RECEIVED

FEB 14 1994

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

PUBLIC SERVICE
COMMISSION

IN THE MATTER OF:

SOUTH WILLIAMSON LODGING, INC. :
(formerly Williamson Super 8 :
Motel, Inc.) :
COMPLAINANT :

VS. :

LITTLE PEARL TRUCKING COMPANY, INC.; :
MOSES LOWE; DENNY MOORE; :
SOUTHSIDE REAL ESTATE DEVELOPERS, INC.; :
and RELIANCE REALTY, INC. :
DEFENDANTS :

94-066

The complaint of South Williamson Lodging, Inc.,
formerly Williamson Super 8 Motel, Inc., respectfully shows:

(A) South Williamson Lodging, Inc., formerly
Williamson Super 8 Motel, Inc., is a South Dakota corporation,
authorized to do business in the Commonwealth of Kentucky, and
has a principal place of business at 1 Southside Plaza, South
Williamson, Kentucky.

(B) The Defendant Corporation, Little Pearl Trucking
Company, Inc., has a principal place of business at P.O. Box
268, Turkey Creek, Kentucky, was administratively dissolved and
its Charter revoked by the Commonwealth of Kentucky, Secretary
of State, on November 1, 1991.

The Defendants, Moses Lowe, whose address is P.O. Box
268, Turkey Creek, KY 41570, and Denny Moore, whose address is
403 Southside Professional Bldg., South Williamson, KY 41503,

are residents of Pike County, Kentucky; and were stockholders of Little Pearl Trucking Company, Inc., to the best knowledge of the Plaintiff.

The Defendant, Southside Real Estate Developers, Inc. is a Kentucky Corporation, has a principal place of business at South Williamson, Kentucky. The agent for service of process is Denny Moore, whose address is 403 Southside Professional Bldg., South Williamson, KY 41503.

The Defendant, Reliance Realty, Inc., is a West Virginia Corporation, qualified to do business in the Commonwealth of Kentucky, has a principal place of business at South Williamson, Kentucky. The agent for service of process is Denny Moore, whose address is 403 Southside Professional Bldg., South Williamson, KY 41503.

(C) I purchased a piece of property from Denny Moore, Reliance Realty, Inc. and others, and as a part of the consideration for the purchase of that property Denny Moore promised he would supply water and sewer services to the property. At the time of the agreement, it was my understanding that he was approved and could legally charge for those services. I have subsequently learned that he is not an approved utility with the Public Service Commission.

I operate a motel and he is charging me \$20 per room per month for water and sewer services. The total amount of this comes to over \$1,200 per month, which is far more than I believe is a fair and equitable rate. The supplier of the

water, Denny Moore, has threatened to cut off services and I had to file an injunction suit to keep the services from being cut off so that I could maintain the motel.

I do not believe that Mr. Moore is in compliance with the regulations of the Public Service Commission rates or that he has been approved to supply water and sewer services to me.

WHEREFORE Complainant respectfully requests that he be fully investigated and take the necessary steps to be approved or sell his lines to an approved supplier so that I can receive service at a rate that is appropriate with the Kentucky regulations. I also would appreciate, if I am entitled to any refund for excess charges incurred that I be awarded that refund, if appropriate.

DATED this 8th day of February, 1994.

~~SOUTH WILLIAMSON LOGGING, INC.~~

BY: 

Its President

STRATTON, MAY & HAYS, PSC
P.O. BOX 851
PIKEVILLE, KY 41502-0851
Telephone: (606) 437-7300
Telefax: (606) 437-7569

BY: 

David C. Stratton

"Attorney for Complainant"