

Douglas and Sylvia Morrison
440-31st St.
Ashland, Ky. 41101
Sept. 2, 2015
606-324-0303

RECEIVED

SEP 8 2015

PUBLIC SERVICE
COMMISSION

Dear Mr. Derouen:

Since it wasn't required of me (Sylvia Morrison) to respond to AEP's change of original answers I have chosen instead to only address the supposed additional findings. But I have also made a list of all the errors I found in the AMENDED RESPONSE and a response to them as well should it be requested by PSC. For now I'll just cover the unexpected changes in the answers from AEP.

I'm also including 2 additional pictures to prove what Kevin Smith of AEP said was not true. I don't even own a blue extension cord. I also invite AEP and PSC to come into my locked back yard to inspect and take pictures to verify I'm the one telling the truth. Not Mr. Brown or Ms. Kahn.

Thank you again for giving me equal time to contest these latest allegations. I value my reputation and I strongly resent when I'm falsely accused of lying.

Sincerely,

Sylvia Morrison
Sylvia Morrison
Sylvia Morrison

Originals
Page 1

STATE OF: Kentucky
COUNTY OF: Boyd

I, RENEE SCHMUTZ-SOWARDS, a Notary Public, do hereby certify that on this 9 day of 3, 2015 personally appeared before me RENEE SCHMUTZ-SOWARDS, address 1740 CENTRAL AVE known to me to be the person whose name is subscribed to the foregoing instrument, and swore and acknowledged to me that SYLVIA MORRISON executed the same for the purpose and in the capacity therein expressed, and that the statements contained are true and correct.

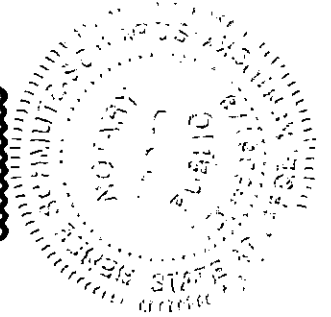
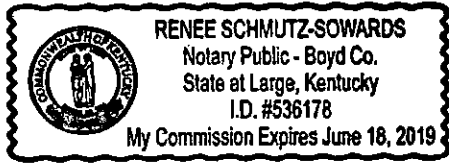
[Signature]

Notary Public, State of Kentucky

Notary ID Number _____

Notary: _____

My Commission Expires: _____



RESPONSE TO AMENDED ANSWER OF KENTUCKY POWER COMPANY

FIRST DEFENSE

1. If not meant to deceive or mislead then why was I never told I was paying for a streetlight or asked if I wanted one? why was the bulb over my shed replaced & the fixtures repaired in the past? why did Mrs. Kahn state over the phone during the first call that the street light was listed as being in front of my porch in my front yard? Clearly the street light was attached across the alley by the neighbor's yard exactly 10 ft. away from my property by city record. We had no privacy in the evening. Simply enjoying our porch was like sitting in a spotlight.

SECOND DEFENSE

2. I don't see how KRS 278.160 applies in this case except in the fact that I was charged for services I never wanted and that law says AEP is not allowed to.

THIRD DEFENSE

3. I've never known statutes of limitations to apply until you know there is something to complain about. You haven't listed any applicable statutes of limitations so how am I to know whether I'm barred or not?

FOURTH DEFENSE

4. First I wasn't making any claims except my own for credit or compensation. But if the truth be told I was both my mother's power of attorney and the executrix of her estate.

FIFTH DEFENSE

5.

a)Wrong. Leodia Easterling's service was not established Dec. 20, 1994. It was transferred in November 1994 from the home she had sold and no longer living in. I would never have let my 74 yr. old (at that time) mother live for a month without electricity.

b)Wrong. Both I and Douglas transferred (not established) our account as well. We moved from Spring St. to 31st St. April 1, 1996. Like my mother we were of the perception that the unmetered portion was the light over our shed.

c)Ms. Kahn stated AEP did not have any records going back 20 years. But she did state she was "pretty sure" they would have been the same.

d)We now know the lamp on the shed is metered. But we only discovered that when AEP refused to fix it this last time in March 2015.

e)I never said it was a high pressure sodium. I said my nephew said that. I have no idea what kind it is. It isn't my responsibility to know what kind of lights AEP does or does not use. But the law you quoted in AEP's second defense states it is AEP's responsibility to not overcharge or for services never requested.

f)I have never questioned AEP as to what the pole number was and AEP can put one anywhere they want. But if AEP is going to charge me then they need to get my permission.

g)If the dusk to dawn lamp was installed April 7, 1992 on pole 2184 across the alley then it proves we had no reason to believe it was the unmetered light. It was there before us. But the light started at 2182 and was moved to pole 2184 because of excessive foliage and ivy growing that had to be tended on a regular basis. It was moved approx. 10 yrs. ago or maybe longer. You can tell by the pictures sent the light fixtures were identical. I never looked at the bulb on the other side of the alley so I have no idea if they had the same bulb. Also according to AEP's own records by Ms. Kahn up until March of 2015 the light we were paying for was "in front of our porch in our front yard". This was not and never has been true. This should be easy enough to verify since a recording tells you the call will be recorded for quality purposes and it hasn't been that long ago.

h)There is a difference between having a policy and practicing it. No one ever asked us.

i) This is true but only because we believed the light over our shed was the unmetered one.

j) Why does AEP have some records that go back that far and others that don't?

k) It was on 2182 to start with. That is the left most one on Page 13 not in the foreground.

l) Wrong. The rearmost pole on Page 13 has never had a street light and I don't know its number or if it has one. All I know is the weeds and ivy grew from one to the other. I only showed the one in the rear so you could see how the weeds climbed up and over it to 2182.

m) I never said the leftmost pole on Page 14 was a Ky. Power pole. In truth I clearly stated on the same page the pole in my yard had never had a light. According to AEP's records that was where "the light in my front yard by my front porch" would have been if what I had been told by Ms. Kahn was true. Thus by your own statement there has never been a light there and the pole belongs to some other utility. That pole was only added the last few years. If I or my mom had requested a street light 21 & 19 yrs. ago respectively it could have easily been placed there. There would have been no excuse to put it across the alley.

n) Depends on if you mean rightmost pole in the picture or in the alley by my house. If in the alley by my house—yes. If you mean the one I'm pointing from on the rightmost side of the picture that is 2182.

p) If the truth be told I don't nor have I ever owned a blue extension cord. This is untrue on so many levels I will cover them all to be sure there are no mistakes. There is no cord of any color running from our residence to the shed. I invite both the local PSC and AEP to come take pictures and to see the truth. My shed lights on the inside can be switched on and off. The light over my shed can not be turned off by a switch. I have to turn off the breaker to turn off the light over the shed. The shed is kept locked as all of my husband's valuable tools are kept there. We couldn't lock it or keep the weather out if a cord ran in and out of it. I have included a close up picture of the string of American flag lights that were hanging from the shed and lamp at the time of the original picture on page 12. I have also included a pic of the shed with the flag lights removed, the light still shining during the day and ALL wires clearly above the shed. Mr. Brown never got out of the truck until he reached the end of the alley where he claimed AEP's light was. He was trying to leave without saying anything to anyone except that the light over the shed was not AEP's. Mr. Brown had his windows rolled up and was ignoring my yells and hands waving. He finally responded when my husband waved.

SIXTH DEFENSE

6) I have provided pictures of what Mr. Brown saw both in the earlier complaint and currently.

SEVENTH DEFENSE

7.

a) Dates are wrong as clearly stated in FIFTH DEFENSE both a & b.

b) There has been way too many times the lights have been knocked out in the last 21 yrs. for there to be only one record of another service call. I call everytime it goes out as do the neighbors. The reason I remember the one mentioned in May of 2012 was because a transformer was blown & it was very loud. Once that was fixed all the lights in the area came back on so I had the service call cancelled because I had reported the outage and I didn't want someone to come out for no good reason.

c) AEP has more than sufficient evidence to admit most of what they are denying.

8. The repair call wasn't cancelled until after Mr. Brown left. I clearly told the lady over the phone at AEP that the light out back was blown and she never questioned it. You state AEP had the request for the repair March 25, 2015 then there should be a recording of what both she and I said.

9.

a) Agreed though I only know Mr. Brown by name because Mr. Overstreet states that's who he is.

b) No he told my husband Doug then tried to drive pass my waving arms and yelling for him to wait.

c)Mr. Brown DID NOT tell me the lamp I was being billed for was across the alley until I asked him where the one I was being charged for was if not on my shed. I said it was on my neighbor's property. He just pointed then told me to call his boss.

d)Mr. Brown did not say the lamp affixed to my shed was metered.I had to call Mueller's Electric and ask them how I could prove the light over my shed was unmetered before I went to the expense of having it moved closer to the ground. I didn't want to get in legal trouble if it was AEP's and Mr. Brown and Ms. Kahn had made a mistake. After doing what they told me to do I discovered the light was metered and we and my mother (whether deliberate or default) had been lied to and charged for decades.

e)AEP also says they have no calls but of one in over 20 yrs. But the real point is I never asked for nor agreed to it being placed as a street light across the alley in the middle of one block that has 3 or 4 lights at each end.

10.

a)If the truth be told I wasn't agitated until he ignored my waving and calling from the porch mere feet away from him. When he stated our light was on a pole I said bull.He never informed me he would tell his supervisor.He told me I'd have to call and discuss it with his supervisor.But unless she told him otherwise he wasn't "doing nothing".I said so just like that you're going to leave our backyard in the dark knowing this is a bad neighborhood instead of calling your supervisor and getting this worked out.He then said it was between me and her.He had another job to do.When I asked his supervisor's name he said just to tell them it concerned the light at my house.He never gave a name.He then rolled up the windows & started to take off.

b)Mr. Brown didn't argue.He just got a very nasty attitude from the beginning like we had wasted his time and bothered him.

11.

b)George Morrison has been dead since January 12, 1994 so he can't be paying the bill.His son Tony inherited the garage I mentioned.

c)Tony's garage has no bearing on what AEP did to both me and my mother.

d)Insufficient information makes one unsure.To deny is to risk lying.I have denied only those things I KNOW to be wrong.

13.

b)Not at first. At first she told me it was on a pole in my front yard by my front porch.

c)She did. But I told her mine was on my shed. Not across the alley.

d)It's obvious I called PSC. No one asked AEP if I did.

e)I didn't say she did. Mrs. Kahn simply said they haven't done it since she's been here & she's been here over 10 yrs. But AEP doesn't have any records of their policies that far back according to Ms. Kahn.

f)I stated the truth as I witnessed it. Not as I wished it to be or as told through a second party.

14.

a)I can provide the 1994 death cert. of George Morrison if you like.But it has no bearing on what AEP did to us and my mother.

b)Since NO ONE from AEP has even been in the yard past our locked gate to look at the fixture, let alone the bulb how is AEP so sure it's not a high pressure sodium bulb? I'm not an electrician nor do I have any desire to be. I had never even heard of that type of bulb until this incident came up and I still have no idea for sure. When I spoke to a man at Applachian Electric Supply in downtown and described it he said it might be a metal haylide(sp?). He said they haven't used mercury vapor in 20 years because of the danger of the mercury. But again I don't know. I only know in over 20 yrs. it's been replaced at least once, maybe twice with the last time being around 10 yrs. ago and a man in an AEP truck did

it.

15. I didn't ask AEP to admit what the guy at Mueller's said. He spoke to me, not AEP. I just repeated what the guy at Mueller's said.

16.

b) After 21 yrs. total of both my mother and I being billed Mrs. Kahn told us.

c) I did not say request for relocation. I said we and several neighbors requested it to be MOVED, not relocated.

d) Everything I stated in the entire answer is true to the best of my knowledge and experience.

17. OK Mrs. Kahn did from about 50 ft. or so away.

18.

b) Unless Mrs. Kahn climbed over the fence in my back yard after we went inside she was nowhere near enough to study the fixture, let alone the bulb on the inside of the outside fixture of my shed. Approx. 50 ft. was the closest she got. I know because my property is 100 ft. long and she wasn't quite halfway down it. She glanced then started walking away while continuing to say the light on the pole was what we had been paying for.

19.

a) I agree. She did say that. But I challenge AEP to find a salvage yard that sells them. Too many liability risks with mercury vapor.

20.

a) That isn't the correct date I transferred my account. If Ms. Kahn had asked me I would have told her. In 5b) AEP admits it was April.

21.

a) Clearly AEP did since they never made us aware of what light we were being billed for.

b) I DID NOT request a refund. I asked for credit for the years we had been deceived. I didn't request my mother's share.

d) I stated it

24.

a) I never said she did.

b) She said she didn't know the company policies back then.

c) I asked her why they didn't ask back then. She again answered me the above.

d) No records kept of that?

25.

b) What else do you call it when someone takes your money for a service you didn't want?

c) Again it was April not Dec.

28.

b) untrue.

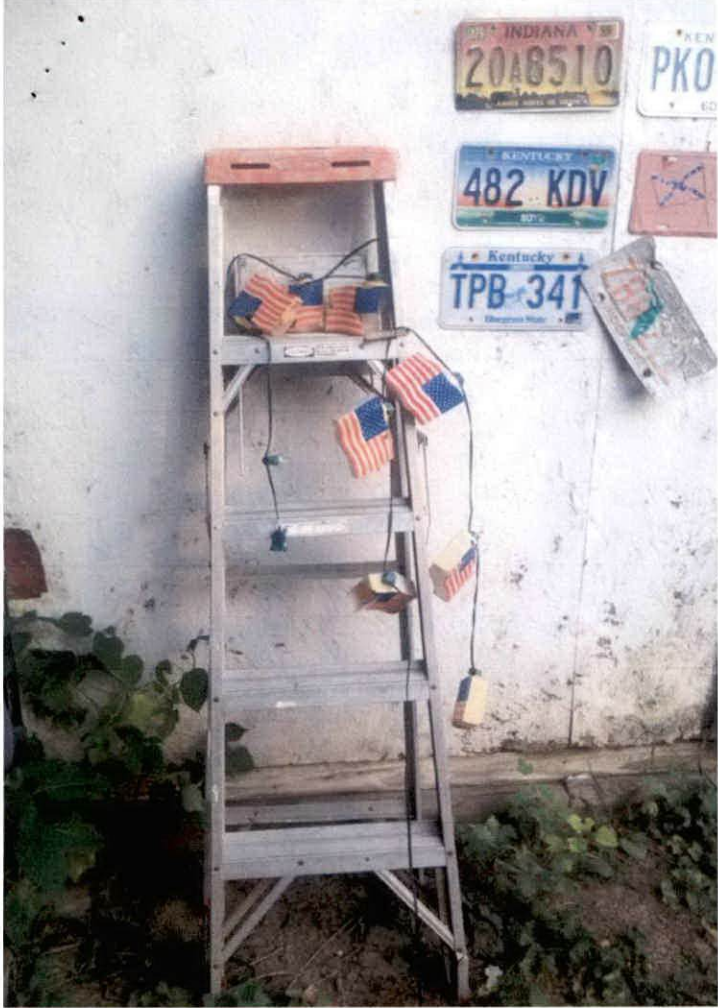
c) It looks identical to everyone around here

d) The alley abutting my property isn't the same as the pole being in my front yard by my front porch as AEP & Ms. Kahn stated

This picture clearly shows the lamp
is lit and there are no cords or any
kind leading to, in or out of it. The
lines that are even close are a good
2 ft ^{up} and go left and right over the
shed roof.

Page 5
You can use the orange egg
switch inside 2 1/2 and it will
NEVER turn off the light over
the shed, just the ones inside are
checked.





Page 6

As can clearly be seen by comparing picture on page 12 in original answer these flags were flying from the lamp over the shed. It was not any kind of extension cord. There is no extension cord going into, out of or any other wise my husband's shed to any light. In fact the only extension cord we have that goes that far is bright orange. There is approx. 15 ft between my house and shed. At 8 ft high there isn't even a plug in either end. Outside of that we have no clue what Mr. Brown of NEP thought he saw.