

August 18, 2025

Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, KY 40601

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PUBLIC SERVICE
COMMISSION

RE: CASE NO. 2024-00360
James M. Vincent, Complainant

Commissioners:

I am writing in response to the letter received from the Kentucky Public Service Commission, entered on August 13, 2025 as Case No. 2024-00360. The following is the amended complaint which addresses the procedural deficiencies noted in the Commission's response including the relief or remedy sought in the case, the address of the complainant, Mr. James M. Vincent, and the wrongful conduct for which the complainant seeks relief from the Commission.

On or about April/May 2024, Louisville Gas & Electric began installation of a natural gas line in front of complainant's property. A wooden stake with the words "end of gas line " was written on the stake and placed approximate 200 feet beyond the mail box in the complainant's easement. The first day was spent drilling hydro holes searching for existing underground utilities, and a very large deep hole was dug with an excavator on the complainant's property to enable an underground pipe to pass under the roadway. A hydro hole was dug close to the mail box and the complainant ask how long before the flowers and mailbox needed to be moved. The installer replied they would reach that area within a few days.

The second day, the installers backfilled the large hole dug by the excavator and stated they no longer needed the mailbox and flowers moved. They stated Louisville Gas & Electric had changed plans and now wanted the gas line placed on the other side of the roadway, where all the neighborhood utilities were buried. Unfortunately, the flowers and mailbox had already been moved by the complainant in anticipation of the original plans.

Eye witness account and physical evidence show that a gas line installation was planned on the complainant's side of the roadway in the utilities easement and after the first day of work on the installation, the large hole was backfilled and the project was moved across the street where a much more complicated installation was completed. Soon after installation was done, the property within the easement of the complainant near the roadway developed a large hole which collects water from an underground source, remaining stagnant. Approximately 200 feet north of the large hole is a national spring that feeds Hidden Creek. This is a public safety issue due to walkers, runners and cyclists in that area. There is a concern that there will be continued erosion into the roadway. **(Wrongful conduct)**

The complainant is requesting that the source of underground water leak supplying the hole with water be repaired for public safety. **(Relief or remedy sought in the case)**

A large hole that was dug with an excavator where the gas line was going to cross under the roadway initially is located along the roadway approximately 577 feet from my mail box in a south easterly direction. The complainant's address is in Prospect, Kentucky located at 5400 Schuler Lane, which is clearly marked on the mailbox. **(Address of the complainant)**

A handwritten signature in black ink, appearing to read 'J. Vincent', written in a cursive style.

Complainant: Mr. James Vincent
5400 Schuler Lane
Prospect, KY 40059