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PUBLIC SERVICE COMMISSION

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

CASE NO. 2026-00154

MELISSA SAURINI AND JONATHAN JONES, Complainants

v. KENTUCKY UTILITIES COMPANY, Respondent

COMPLAINANT MELISSA SAURINI'S REQUEST FOR FORMAL HEARING AND DETAILED STATEMENT OF FACTUAL ISSUES

Request under the September 10, 2026 procedural order

Complainant Melissa Saurini requests a formal evidentiary hearing pursuant to the Commission's September 10, 2026 procedural order, including the October 23, 2026 deadline for hearing requests. This filing identifies disputed material factual questions and is not a withdrawal of the amended complaint or an assertion that a hearing is automatic.

1. RTOD rate configuration and October 2025 billing

KU's October 2025 bill initially omitted on-peak and off-peak energy charges, and a corrected bill reported 1,232 kWh (182 on-peak and 1,050 off-peak). The parties dispute the effective dates and cause of the billing configuration error, the corrective actions, and whether the interval data supports the billed energy and rate allocation. KU discovery Questions 1, 3, 5, 7 and 20 are relevant.

2. Meter readings and verification

The corrected bill assigns a 27,670 reading to October 7, while Q01 daily readings place 27,629 and 27,670 on successive dates. The meaning of timestamps, reading cutoffs, any substitutions, and the distinction between manufacturer accuracy testing and July 23, 2026 meter-to-premises verification remain material factual questions. Questions 1, 2, 8, 10 and 11 are relevant.

3. Payment arrangements and account balance

KU's Q05 ledger includes a December 2025 $106.68 "Removal from Installment Plan" entry and May 19–20, 2026 payments totaling $350. The running balance, treatment of plan transfers, dates payments were received and posted, and reconnection arrangement terms require explanation. Questions 5, 15, 17, 18 and 20 are relevant.

4. May 19 disconnection and reconnection

Q02 records successful disconnection at 9:50:13 a.m. and reconnection at 5:37:20 p.m.; KU customer-service material reports a 6:36 p.m. reconnection. The difference may reflect time zones or different events, but the records require explanation alongside payment and notice records. Complainant does not claim the discrepancy alone proves wrongdoing.

5. Customer communications and missing records

The parties dispute what KU communicated about RTOD implementation, billing correction, payment plans, and follow-up investigations, and whether available contemporaneous records fully explain these events. KU produced seven confidential recordings, which should be treated according to applicable confidentiality procedures.

Reason a hearing is requested

These are specific, material factual questions potentially requiring testimony from persons familiar with KU's metering, billing, account, and service systems. Complainant requests the opportunity to present relevant evidence and examine witnesses as permitted by Commission procedures. Issuance of a corrected bill does not alone establish resolution of all disputed matters.

Position on informal conference and requested relief

Complainant's October 16, 2026 opposition to KU's October 14 motion for an informal conference requested time to review outstanding discovery before considering settlement; it was not a withdrawal of the complaint or a refusal to comply with any Commission order. Complainant respectfully requests that the Commission grant a formal evidentiary hearing, preserve the ability to address disputed factual matters, and give notice and an opportunity to respond before any proposed dispositive ruling. This hearing request is separate from the discovery-response filing.

Respectfully submitted,

/s/ Melissa Saurini
Melissa Saurini, Complainant, pro se
On behalf of herself only; Jonathan Jones remains a named complainant.
Dated: October 22, 2026

CERTIFICATE OF SERVICE

I certify that a true copy of this filing is being served contemporaneously with its submission to the Kentucky Public Service Commission by email to Christopher C. Tieke at cctieke@pplweb.com and Sara V. Judd at svjudd@pplweb.com, counsel for Kentucky Utilities Company. This certification applies only if the filing is sent with those counsel copied on the same email.

Dated: October 22, 2026
/s/ Melissa Saurini
Melissa Saurini, Complainant, pro se