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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 RESPONSE TO KU DISCOVERY AND REQUEST FOR CLARIFICATION

Purpose and procedural position

This filing responds to KU's October 16, 2026 discovery production. It seeks record-specific clarification without presuming that each difference proves misconduct. It is separate from the hearing request and does not withdraw or waive the amended complaint, contested issues, or requested relief.

1. RTOD configuration and October bills (Q3, Q7, Q20; Q03E, Q07C, Q20E, Q20F)

Identify the incorrect configuration, effective dates, date and mechanism of correction, systems and responsible personnel, and available change logs. Reconcile the original bill showing no on/off-peak energy charges with the corrected 1,232 kWh bill (182 on-peak; 1,050 off-peak). The corrected total of $357.46 reconciles arithmetically to a $196.73 prior balance, $134.07 current charges/taxes and $26.66 deposit installment; the underlying usage and rate allocation still require verification.

2. Meter reading and interval reconciliation (Q1, Q5, Q20; Q01)

Explain why a corrected billing read of 27,670 dated October 7 corresponds to Q01 daily readings of 27,629 and 27,670 on successive dates. Specify timestamp and time-zone conventions, interval boundaries, peak windows, billing cutoff, any estimated or substituted values, and the rows and method reproducing the 1,232 kWh allocation.

3. Billing audit and $106.68 adjustment (Q3, Q5, Q7, Q20)

Provide or precisely identify configuration and correction audit records, or state which systems were searched and why records do not exist or are unavailable. Explain the December 2025 "Removal from Installment Plan" transaction of $106.68 and its effect on the account. Supply a chronological running balance identifying charges, credits, reversals, deposits, transfers and payments without double counting.

4. May 2026 payments and reconnection (Q2, Q5, Q15, Q17, Q18; Q02, Q05, Q15J, Q18B)

Reconcile Q05 payments of $150 on May 19 and $50 and $150 on May 20 (total $350) with the partial-payment arrangement and service restoration. Identify initiation, receipt, posting and authorization times. Explain Q02 successful disconnection at 9:50:13 a.m. and reconnection at 5:37:20 p.m. May 19 versus the 6:36 p.m. reconnection reference in Q15J, including each system's time zone and event definition. Explain the June 12 note in Q18B as it relates to May events.

5. July 23 meter events and tests (Q2, Q8, Q10, Q11)

Explain the July 23, 2026 disconnect/reconnect entries, whether they were part of meter-to-premises verification, and whether referenced field photographs were produced. Distinguish the February 2024 manufacturer accuracy test from July 2026 field verification and identify any later accuracy tests.

6. Customer-service evidence (Q15, Q16; Q15D and confidential recordings)

Identify the plan that triggered three unsuccessful September 6, 2025 online installment-plan attempts, including plan terms and status. For the seven confidential audio recordings, identify call dates, available identifiers, corresponding notes, investigation tickets, promised follow-up and actual correction actions. Confidential audio or personal information should not be publicly disclosed absent appropriate treatment.

Requested action

For each item, identify exact previously produced attachment/page/worksheet/row that supplies the answer, or supplement the response and explain any unavailable records. Preserve original interval data, configuration histories, billing adjustments, payment and work-order records, customer notes and recordings. Complainant requests electronic service and reserves the right to seek appropriate Commission relief concerning material discovery disputes. This request does not itself represent a Commission order compelling supplementation.

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