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SEP 13 2019

PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the matter of:

Vanessa Allen)
(Your Full Name))
COMPLAINANT)

VS.

Louisville Gas & Electric)
(Name of Utility))
DEFENDANT)

COMPLAINT

The complaint of Vanessa Allen respectfully shows:
(Your Full Name)

(a) Vanessa Allen
(Your Full Name)

9000 Cedar Grove Rd Shepherdsville Ky 40165
(Your Address)

(b) Louisville Gas & Electric
(Name of Utility)

220 W. Main St. Louisville Ky 40202
(Address of Utility)

(c) That: ① LG&E sought to hide true land values
(Describe here, attaching additional sheets if necessary,

from landowners in an effort to profit at their
the specific act, fully and clearly, or facts that are the reason

expense ② LG&E used their status as a
and basis for the complaint.)

powerful utility monopoly to bully and

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Formal Complaint

Vanessa Allen vs. Louisville Gas & Electric

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intimidate landowners. ③ LG&E failed to complete thorough environmental surveys. ④ LG&E is disregarding safety concerns and failing to report unsafe conditions along the proposed pipeline route in Bullitt County, Kentucky. See attachment.

Wherefore, complainant asks ① PSC cause LG&E to complete
(Specifically state the relief desired.)

full environmental impact studies ② PSC hold LG&E accountable for bullying, deceit & intimidation. ③ PSC provide review and oversight of the planned project and note the fraudulent nature of information submitted by LG&E ④ PSC ensure the safety of the planned pipeline path.

Dated at Shepherdsville, Kentucky, this 8th day
(Your City)

of September, 20 19
(Month)

Vanessa Allen
(Your Signature)

(Name and address of attorney, if any)

Louisville Gas & Electric has used deception as a means to hide the true land values from property owners subject to condemnation and has also withheld information from the courts in an effort to prevent affected landowners from receiving just compensation. In a filing dated January 25, 2017 within case number 2016-00371, Louisville Gas and Electric asked for confidential treatment of the information related to the route of the proposed high- pressured pipeline planned for Bullitt County Kentucky. Page 9 of the filing states as follows:

“The map identified a proposed pipeline route, for which LG&E has not notified property owners, obtained easement rights to, or requested survey rights. If the location of the proposed pipeline route was disclosed, the land through which the pipeline crosses may increase in value, forcing LG&E to spend more to construct the pipeline, to the detriment of the Company and its ratepayers.”

LG&E was advised multiple times of our plans to sell off part of our property and information pertaining to the proposed route on my land was requested verbally initially and then later written on four occasions between May and August of 2018. The lack of responsive information caused my family financial strain and residual hardship to date. We only purchased our land in 2016 and as a result of Louisville Gas & Electric’s behavior and Public Service Commission’s allowance of confidential treatment, we have essentially been held hostage financially since.

Additionally, on July 30, 2019, Louisville Gas & Electric filed with Bullitt County courts to have commissioners appointed to assess my land value. With that filing, Louisville Gas & Electric provided the courts with survey plats of my land that were at least three years old. The survey plats do not show a pole barn measuring 50 feet by 70 feet that was constructed in late summer of 2016. The plat also fails to show my home which was under construction beginning in the Fall of 2017. Louisville Gas & Electric surveyors and employees were well aware of the barn as it was constructed prior to any of their surveys on my land and visited my land after the construction of the home began as well. The proposed high- pressured natural gas pipeline is within close proximity to both structures. Clearly, Louisville Gas & Electric sought to perpetrate a false presentation of my land’s value as well as defraud the court.

Louisville Gas & Electric has used their status as a powerful for-profit monopoly to bully and threaten landowners. In the Summer of 2017, I was threatened with “eminent domain” and bankruptcy of my estate by Jeff Kuriger, an employee of Louisville Gas & Electric. In the Spring of 2018, I was threatened twice with “eminent domain” by Travis Rogers, an employee of Emerald Energy, an agency contracted for the purpose of coercing agreements from landowners. Travis Rogers told me if I was not agreeable for the easement, Louisville Gas & Electric would make my land “unusable” and take it at “no value.” Louisville Gas & Electric has told other landowners that they were the “last holdout” which was not factual.

Several other landowners, especially females, have been subject to events of intimidation by Louisville Gas & Electric or their contract agency. I have approached management multiple times and even notified William H. Spence of PPL when I did not get a response from Louisville Gas & Electric. On 9-27-17, Louisville Gas & Electric came to my land with a Bullitt County Sheriff’s deputy who was wearing a badge, driving an official vehicle, and garnishing a gun. It was only sometime after that visit that I was made aware the deputy was not acting in official capacity. At other times, and after Louisville Gas & Electric was made aware they should not be on my land when my husband is not home, they sat in my driveway for 45 minutes while I was home alone. I am one of two women who were visited by men.

who claimed to have warrants for our arrests in an effort to cause us to open our doors while we were home alone. We live in remote areas.

The company used its website to ostracize the landowners who did not comply by alleging that the landowners were creating "a hardship for economic development." In fact, Bullitt County has hundreds of thousands in square feet of empty warehouses directly along the planned pipeline route. Bullitt County also has approximately 1500 job openings available at any given time. The inability to staff existing openings is problematic and was documented by WDRB in an article written April 19, 2019:

https://www.wdrb.com/in-depth/bullitt-county-looks-to-start-bus-route-to-warehouse-jobs/article_9dec1ab4-62db-11e9-a7ae-b3c61e581156.html

Bullitt County has so many empty job openings that the Economic Development Authority proposed a bus route to transfer people from another county approximately 30 miles away to staff the positions.

The website also alleged the unagreeable landowners were creating a hardship for "customers wanting low-cost natural gas service." In fact, I have documentation from Louisville Gas & Electric authorities that confirm no resident along the entire path will have access to natural gas once the line is installed. I believe that I have been a victim of cyber bullying based on Louisville Gas & Electric's portrayal of my refusal to submit to an easement as a hardship for other residents.

From the inception of this project, Louisville Gas & Electric has been allowed to manipulate via deceit and threats of punishment. In the Spring of 2017, I received a letter requesting permission to survey my land. I denied this request, mailed the letter back and followed with two telephone calls to further express that I do not consent for Louisville Gas & Electric to survey my land. I later determined that Louisville Gas & Electric trespassed on my property on at least four occasions without my consent. Monica Braun, attorney for the company, admitted in court filings that the company began to send letters to the previous landowner. Additionally, Louisville Gas & Electric has used their proposed pipeline area as a means for retaliation due to my refusal to consent. Proposed paths on my land up until October 2018, did not involve a temporary workspace of 3.67 acres. After it became clear to Louisville Gas & Electric that I would not agree to the proposed easement, the workspace was added to the route on my land. This work space is located directly behind my home.

Louisville Gas & Electric completed faulty surveys which are intentionally incomplete. I have documented high grade Kentucky Glade Cress on my property. In March of 2018, while the plant was in full bloom, I contacted Travis Rogers of Emerald Energy by phone and text message in an effort for the survey team to view the "impressive" (per botanists) habitat on my land. I did not get a response from him. Kentucky Glade Cress only blooms during a short period of time and once it is gone to seed, it is difficult to identify. In April of 2018, weeks after I requested Travis Rogers examine the plant and after the plant had gone to seed, Louisville Gas and Electric sued me under the guise of needing access to survey for the plant and also to survey to determine a route. At that time, LG&E had been on my land no less than 4 times. Additionally adding to the concerns that I was sued unnecessarily, emails received through open records show John Snider of Bullitt County Economic Development Authority emailed Kevin Evans on March 3, 2017 and stated "Based upon a conversation this afternoon with Tom Rieth, LG&E plans to send out letters next week to land owners regarding the possible purchase

of Right of ways for the new pipe in Bullitt County...The Route would be on 480 starting in the Rte. 150 area and switching to the south side closer to the 165 interchange.” The route was clearly known prior to Louisville Gas & Electric’s contact with any land owner.

In April of 2018, cultural surveyors spent exactly 28 minutes on my land which is comprised of 125 acres. I was present for the surveys. No soil samples and no sifting for artifacts was completed. Since that time, we have found a large amount of artifacts and have made multiple written requests for Louisville Gas & Electric to send surveyors to review them. Some of the artifacts were found within a cave, which is in close proximity to the proposed pipeline route and also happens to be the cave in which bat droppings were found in abundance. The artifacts, the cave, nor the bats are documented in the surveys completed on my land.

Louisville Gas & Electric appears to have a disregard for any safety concerns with the proposed project. The proposed pipeline will connect to an antiquated pipeline that failed routine assessments repeatedly to the point of being out of compliance with federal regulations. The planned pipeline will run through floodplains, karst land with sinkholes and caves as well as underground springs that feed our ponds. Most of these features are absent on the survey reports submitted. Complicating this concern is that the eastern area of the planned pipeline has no access to city water and no fire hydrants and some of the homes are located on one lane, narrow roads.

I am requesting that Kentucky Public Service Commission require Louisville Gas & Electric to complete full environmental impact studies; that Louisville Gas & Electric be held accountable for their acts of bullying, deceit, and intimidation; that The Public Service Commission provide review of this entire project and note the fraudulent and invalid nature of the information submitted by the utility; that The Public Service Commission ensure the safety of the planned pipeline.