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RECEIVED

MAR 26 2026

**PUBLIC SERVICE
COMMISSION**

March 23, 2026

Commonwealth of Kentucky
Public Service Commission
211 Sower Blvd
P O Box 615
Frankfort, KY 40602-0615

RE: Case No. 2025-00248
Gary A. Miller, Complainant
Duke Energy Kentucky, Inc, Defendant

Enclosed please find Responses to the Public Service Commission's Request for Information. If you have any questions or concerns regarding this matter please contact me.

Sincerely,



Melissa R. Dixon, Esq.

cc: Duke Energy Kentucky, Inc.
139 East 4th Street
Cincinnati, OH 45202

residence and provide a copy of any documentation of such agreement, lease, understanding, or correspondence.

- d. Identify by date, amount, and payment status of the last bill for electric service Complainant received before the account was transferred out of Complainant's name.

Response: Complainant does not recall with specificity the date Allen Michael Foley and Kayla Foley moved into the Residence. He believes it was approximately November 4, 2022. There was no written agreement, lease, or contract. Allen Michael Foley and Kayla Foley did not pay rent or provide services to the Complainant in exchange for living at the Residence. The verbal agreement was for Allen Michael Foley and Kayla Foley to pay the gas and electric bill. There was no agreement that the gas and electric bill would be placed in either of their names.

Complainant does not recall the amount or date of the last bill before the gas and electric accounts were placed in Allen Michael Foley's name.

2. Refer to page two of the Complaint.

- a. Identify Christian Foley and Kirsten Foley and their relationship with Complainant.
- b. State whether either Christian Foley, Kirsten Foley or both, also resided at the Residence and, if so, the periods of residency.
- c. State whether Complainant resided at the residence during the period in which he alleges the account for electric service to the Residence was in the name of Allen Michael Foley, Kayla Foley,

Christian Foley, Kirsten Foley, and/or any other resident of the subject property.

RESPONSE: Complainant states that Christian Foley is his grandson and Kirsten Foley is his granddaughter. They moved into the Residence after they graduated from high school in 2023.

Complainant further states that he resided in the Residence during the period in which the account for electric service was in the name of Allen Michael Foley, Kayla Foley, Christian Foley, and/or Kirsten Foley. He continues to reside in the Residence.

Claimant also states that at no time did Allen Michael Foley, Kayla Foley, Christian Foley, or Kirsten Foley have a written or verbal lease with him or rent any portion of the residence. Claimant allowed them to reside in the Residence because they were his family and they did not have any other place to live. He did not direct or authorize the electric account to be taken out of his name.

Respectfully submitted,



Melissa R. Dixon
Legal Aid of the Bluegrass, Inc.
104 East 7th Street
Covington, KY 41011
Telephone: 859-957-0722
Email: mdixon@lablaw.org

Verification

The undersigned hereby certifies that he has reviewed the foregoing Responses, and they are true and accurate to the best of his knowledge and belief.

Gary A. Miller 3/23/26

Gary A. Miller

Commonwealth of Kentucky)

)

County of Kenton)

The foregoing Verification was acknowledged, subscribed and sworn to before me by Gary A. Miller on the 23rd day of March, 2026.



Melissa R. Dixon

Notary Public: State-at-Large

Notary ID: KYNP34542

My commission expires: 8/24/2029