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**PUBLIC SERVICE
COMMISSION**

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

Jason Kremer, pro se, and Kremer Plumbing Services,
LLC

Complainants

v.

Northern Kentucky Water District

Defendant

Case No. 2025-00286

AMENDED COMPLAINT

1. Parties.

Complainant Jason Kremer is an individual and managing member of Kremer Plumbing Services, LLC, whose principal business address is 7857 Alexandria Pike, Alexandria, Kentucky 41001.

Defendant Northern Kentucky Water District (“NKWD”) is a public utility providing water service in Campbell County, Kentucky, subject to the jurisdiction of the Kentucky Public Service Commission under KRS 278.040 and KRS 278.260.

2. Statement of Facts.

(a) The property located at 7857 Alexandria Pike, Alexandria, Kentucky 41001, is owned by Kremer Plumbing Services, LLC, as shown by the Campbell County PVA records.

(b) Without authorization or written consent, NKWD placed one or more utility service accounts for the subject property in the personal name of Jason Kremer rather than the legal owner of record, Kremer Plumbing Services, LLC.

(c) Complainant did not apply for, consent to, or sign any application authorizing service in his personal capacity. NKWD's action resulted in personal billing, potential credit exposure, and liability being imposed upon an individual who is not the customer of record.

(d) Complainant has repeatedly requested that NKWD correct the account name to reflect the legal business entity that owns the property and receives service. The utility has refused or failed to do so.

3. Violation of Kentucky Law and Regulations.

(a) Under KRS 278.160(2), a utility may furnish service only in accordance with its filed and approved tariffs, which must be applied uniformly and without unreasonable preference or prejudice.

(b) By billing and holding an individual personally responsible for utility service rendered to a property owned by a separate legal entity, NKWD violated its own tariff and KRS 278.170(1), which prohibits unjust discrimination or undue preference in service or charges.

(c) Furthermore, under 807 KAR 5:006 Section 5(2), a utility is required to maintain accurate records of the customer of record and may not open or transfer accounts without proper application and proof of authority. Assigning service to a non-applicant who did not request such service constitutes an unauthorized practice and misrepresentation of the customer relationship.

(d) This act also violates Kentucky common-law principles of agency and privacy, as well as the Commission's directive that utilities act with reasonable diligence and accuracy in customer identification and billing.

4. Relief Requested.

Complainant respectfully requests that the Commission:

1. Find that the Northern Kentucky Water District violated KRS 278.160, KRS 278.170, and 807 KAR 5:006 Section 5 by placing utility service in Jason Kremer's name without his authorization.
2. Order NKWD to correct all billing records to reflect the legal customer of record—Kremer Plumbing Services, LLC—for the subject property.
3. Order NKWD to remove any personal liability, adverse credit reporting, or charges assessed in Jason Kremer's personal name.
4. Require NKWD to implement procedures ensuring that future accounts are established only with proper application and verification of ownership or tenancy.
5. Grant any additional relief the Commission deems just and proper.

Respectfully submitted,

Jason Kremer (pro se) 10/10/2025