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**JUL 6 2026**

**PUBLIC SERVICE  
COMMISSION**

**COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

**DA TANYA SHANAY MORGAN,**  
Complainant,

v.

**LOUISVILLE GAS AND ELECTRIC COMPANY (LG&E),**  
Respondent.

**PSC CASE NO. 2026-00124**

# **COMPLAINANT'S MOTION FOR EXTENSION OF TIME TO SUPPLEMENT THE RECORD AND AMEND THE VERIFIED COMPLAINT PURSUANT TO KRS 278.260 AND 807 KAR 5:001, SECTION 20(4)(a)2**

Comes now the Complainant, **DaTanya Shanay Morgan, a living woman**, and respectfully moves the Kentucky Public Service Commission, pursuant to **KRS 278.260** and **807 KAR 5:001, Section 20(4)(a)2**, for an extension of time to supplement the administrative record and amend the Verified Complaint for good cause shown.

In support of this Motion, the Complainant states as follows:

## **I. BACKGROUND**

1. On May 12, 2026, the Complainant filed a Verified Complaint pursuant to **KRS 278.260**, requesting that the Commission investigate disputed utility billing, alleged audit representations, consumer complaint handling, requests for records, and regulatory compliance involving Louisville Gas and Electric Company.
2. On June 16, 2026, the Commission entered an Order identifying alleged deficiencies in the Complaint and providing the Complainant an opportunity to respond.

3. The Complainant has prepared and intends to timely file a Response to the Commission's Order while continuing to gather additional evidence relevant to the issues presented.

## II. GOOD CAUSE EXISTS FOR AN EXTENSION

4. The matters raised in this proceeding are not limited to a single billing dispute or isolated event.
5. The allegations presented involve communications, complaints, billing disputes, and representations spanning multiple years.
6. The Complainant is presently reviewing records dating from **2023 through the present**, including but not limited to:
  - Kentucky Public Service Commission Consumer Services inquiries;
  - electronic mail communications;
  - complaint confirmations;
  - billing records;
  - account records;
  - correspondence;
  - notices;
  - payment records; and
  - other documentary evidence relevant to this proceeding.
7. During this review, the Complainant has already identified previously submitted Kentucky Public Service Commission Consumer Services inquiries from **September 13, 2024**, attached hereto as Exhibit A, documenting concerns regarding disputed billing, payment arrangements, communications with Commission personnel, and the alleged account audit referenced in the Verified Complaint.
8. The Complainant reasonably believes additional relevant records exist that have not yet been located, including archived communications and historical complaint records.
9. Additional time is necessary to identify, organize, and submit these materials in chronological order so that the Commission has a complete and accurate administrative record before rendering a final determination.
10. Granting a reasonable extension will promote fairness, facilitate orderly presentation of evidence, and assist the Commission in evaluating the issues raised in this proceeding.

## III. GOOD FAITH REQUEST

11. This Motion is made in good faith and not for purposes of delay.
12. The requested extension is necessary to permit the Complainant to gather historical records and supporting documentation relating to events occurring over several years.
13. The Complainant respectfully submits that a complete factual record serves the interests of justice and promotes informed administrative decision-making.

## IV. AUTHORITY

14. This Motion is submitted pursuant to **KRS 278.260** and **807 KAR 5:001, Section 20(4)(a)2**, which authorizes the Commission, upon good cause shown, to grant an extension of time for amendment or supplementation of a complaint.

## V. RESERVATION OF RIGHTS

15. Nothing contained in this Motion shall be construed as a waiver of any constitutional rights, statutory rights, administrative remedies, civil rights, procedural protections, or other rights available to the Complainant.
16. The Complainant expressly reserves the right to supplement the record with additional pleadings, exhibits, correspondence, recordings, billing records, complaint history, witness statements, and other relevant evidence as it is located and organized.

## VI. RELIEF REQUESTED

**WHEREFORE**, the Complainant respectfully requests that the Kentucky Public Service Commission:

1. Grant this Motion for Extension of Time.
2. Permit the Complainant additional time to supplement the administrative record and amend the Verified Complaint.
3. Permit the filing of additional exhibits, correspondence, billing records, complaint history, electronic communications, and other evidence located during the Complainant's ongoing review.
4. Accept supplemental filings concerning events and communications occurring from **2023 through the present**, and any earlier records subsequently located that are relevant to the issues raised in the Verified Complaint.
5. Grant such other and further relief as the Commission deems just and proper.

Respectfully submitted,

**DaTanya Shanay Morgan**  
Complainant

**Date:** July 6, 2026

**Email:** [REDACTED]

# Exhibit A

KY PSC Utility Inquiry  Inbox x



**KY Public Service Commission** <pscfilings@ky.gov>  
to me ▾

Fri, Sep 13, 2024, 6:04 AM    

Below is the result of your feedback form. It was submitted by [REDACTED] on Friday, September 13, 2024 at 6:04 AM

-----  
Name: DaTanya Shanay Morgan  
Address: 2821 W Jefferson Street  
City: Louisville  
State: Kentucky  
Zip Code: 40212  
Phone number where you can be reached: [REDACTED]  
Home phone: [REDACTED]  
Utility Name: LGE

State the nature of your concern: Lge has a pattern of practice of retaliating against us when they cannot get money

home phone: [REDACTED]

Utility Name: LGE

State the nature of your concern: Lge has a pattern of practice of retaliating against us when they cannot get money out of us or if we file complaints against this company. Acct with DATANYA S MORGAN has been blocked from payment arrangements for over a month now violation of consumer bill of rights. This company never verifies if this is actually your debt or the UNITED STATES debt. The company and its workers exhibit discrimination practices toward black communities. Civil rights 1964 violations! The bills never make sense and i have video footage of another black women complaining inside of lge. I have advised **rosemary** of all this, but she does NOTHING but argue for LGE! They be mad as hell when they see others get help on the bill. They be soooooo worried about the next motherfucker not knowing or understanding what that person is facing. These people think they are GOD ALMIGHTY and they are NOT!!!!!!touch NOT my annointed and do my prophets NO HARM!!!!!! They steal the resouces from GOD and then charge his people when its the united states debt. I have never received the audit findings that **rosemary** states were mailed in a brown envelope. I HAVE RIGHTS AND YALL KEEP VIOLATING THEM! I AM WOMAN NOT A CORPORATION THE STATE CREATED! I AM DāTanya Shanay Morgan, a living woman with rights who has been harmed by trespass. These people are bullies and they train their employees to be bullies/trespassers!!!! This commonwealth of kentucky agency psc has done nothing in regards to our complaints or concerns!!!!!! They are negligent and only care about robbing the kentucky state citizens!!!!!!!!!!

Have you contacted the utility about the problem: Yes

concerns!!!!!! They are negligent and only care about robbing the kentucky state citizens!!!!!!

Have you contacted the utility about the problem: Yes

----- This is a Copy of the email sent to KY Public Service Commission  
Consumer Services Division. This email is automatically generated please do not reply to this email address.



**KY Public Service Commission** <pscfilings@ky.gov>

Sep 13, 2024, 10:42 AM



to me ▾

Below is the result of your feedback form. It was submitted by ( [REDACTED] ) on Friday, September 13, 2024 at 10:42 AM

-----  
Name: DaTanya Shanay Morgan  
Address: 2821 W Jefferson Street  
City: Louisville  
State: Kentucky  
Zip Code: 40212  
Phone number where you can be reached: ( [REDACTED] )

City: Louisville  
State: Kentucky  
Zip Code: 40212  
Phone number where you can be reached: [REDACTED]  
Home phone:  
Utility Name: LGE

State the nature of your concern: Disputing disconnection notice with the corporation LGE. I have the right to set up payment arrangements on this account and this corporation has intentionnally blocked this acct from making payment arrangenents as a form of retaliation and trying to purposely cause harm. I have the right to life, liberty, pursuit of happiness, the right to not be subjected to cruel and unusual punishment, the rights to water and lights, etc.

