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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

Defendant

AMENDED FORMAL COMPLAINT

Melissa Saurini and Jonathan Jones, appearing pro se, pursuant to 807 KAR 5:001 § 20, respectfully file this Amended Complaint and state as follows:

I. PARTIES

1. Melissa Saurini and Jonathan Jones are residential customers of Kentucky Utilities Company ("KU") residing at 241 Braxton Lane, Lily, Kentucky 40740.
2. Complainants maintain KU Account No. [REDACTED] associated with Meter No. [REDACTED]
3. Defendant Kentucky Utilities Company is a public utility regulated by the Kentucky Public Service Commission and subject to KRS Chapter 278, applicable Commission regulations, and its approved tariffs.
4. Complainants request review of whether KU's billing practices, account administration, service termination actions, and response to customer inquiries were consistent with KRS 278.030, KRS Chapter 278 generally, applicable Commission regulations including 807 KAR 5:006, and KU's approved tariffs.

II. FACTUAL BACKGROUND

5. Complainants voluntarily enrolled in KU's Residential Time-of-Day ("RTOD") rate plan in an effort to reduce household electric costs.
6. Complainants actively attempted to reduce electrical consumption by shifting laundry and other discretionary electrical usage to off-peak periods, minimizing heating usage when possible, utilizing portable and window air conditioning units instead of central air conditioning, and participating in weatherization and under-trailer insulation improvements.
7. Despite these conservation efforts, Complainants experienced unusually high winter electrical consumption and escalating account balances that Complainants did not understand based upon the household's occupancy patterns and conservation efforts.
8. KU issued at least one corrected bill affecting the account, demonstrating that prior account information required adjustment and contributing to Complainants' concerns regarding billing accuracy and account reconciliation.
9. Complainants repeatedly contacted KU seeking explanation and reconciliation of disputed charges, account balances, and consumption patterns.
10. Complainants contend that the account history contains unresolved questions concerning the source, accuracy, and explanation of the winter consumption reflected on the account, as well as the calculation and reconciliation of related account balances.

III. BILLING AND ACCOUNT DISPUTE

11. Complainants dispute the accuracy and explanation of certain winter consumption and related account balances reflected on Account No. [REDACTED].
12. Complainants seek review of:
 - a. Billing calculations;
 - b. Corrected bill adjustments;
 - c. Installment-plan balances;
 - d. Account reconciliations;
 - e. Interval usage records; and
 - f. The basis for unusually high winter consumption reflected on the account.
13. Complainants request that KU provide sufficient records and information to permit verification of the consumption and charges reflected on the account.
14. Complainants request that the Commission determine whether KU's billing and account administration complied with applicable statutes, tariffs, and Commission regulations.
15. Complainants further request that the Commission determine whether

KU's handling of the disputed account, billing inquiries, and account administration was consistent with KRS 278.030 and applicable Commission regulations governing residential utility service.

IV. DISCONNECTION OF SERVICE

16. On or about May 19, 2026, KU remotely disconnected electrical service to Complainants' residence.
17. Prior to the disconnection, Complainants had communicated concerns regarding disputed billing, disputed balances, and account activity.
18. Following the disconnection, Complainants paid approximately \$350 in order to restore service.
19. Complainants request that the Commission determine whether KU's disconnection and restoration actions complied with applicable Commission regulations governing residential electric service, including any requirements concerning notice, disputed accounts, payment arrangements, and termination procedures. Complainants specifically request review of whether the disconnection occurred in compliance with Commission regulations applicable to disputed residential accounts, including applicable provisions of 807 KAR 5:006.

V. METER AND SERVICE VERIFICATION CONCERNS

20. Complainants have experienced recurring electrical irregularities, including flickering lights within the residence.
21. Complainants reside in a mobile home community where many residences appear to be served by separately identifiable electric meters.
22. Complainants observed that after the occupant of a nearby residence within the mobile home community vacated the property, Complainants' apparent electrical usage and billing decreased.
23. Complainants have been unable to identify a visible electric meter serving that residence despite observing separate meter configurations serving many nearby residences within the community.
24. Complainants do not know whether these observations are related to their account; however, Complainants believe these facts provide a reasonable basis to request verification that Meter No. [REDACTED] has at all relevant times been correctly associated with Complainants' residence.
25. Because Complainants experienced electrical irregularities, including recurring flickering lights, and observed a reduction in apparent usage after a nearby residence became

vacant, Complainants request verification of meter association, service routing, and the absence of shared, crossed, or improperly associated electrical loads.

26. Complainants therefore request verification that Meter No. [REDACTED] serves only Complainants' residence and that no shared, crossed, or improperly associated electrical loads are connected to that service.

VI. REQUEST FOR RECORDS AND TECHNICAL REVIEW

27. Complainants request production of:

- a. AMI interval usage data;
- b. AMI event logs;
- c. Disconnect and reconnect records;
- d. Meter association records;
- e. Meter testing and verification records;
- f. Corrected bill records;
- g. Account adjustment records;
- h. Installment-plan records; and
- i. Any records relied upon by KU in calculating disputed charges.

28. Complainants further request technical investigation into the cause of the abnormal winter electrical consumption reflected on the account.

29. Complainants do not dispute responsibility for legitimate electrical usage. Rather, Complainants seek verification, reconciliation, and explanation of disputed consumption patterns, account balances, and service activity.

30. Complainants are not asserting that any particular cause has been established for the disputed consumption. Rather, Complainants seek investigation and verification because the account history, observed electrical irregularities, conservation efforts, corrected billing activity, and disputed account balances raise legitimate questions concerning the source and accuracy of the consumption reflected on the account.

VII. RELIEF REQUESTED

WHEREFORE, Complainants respectfully request that the Commission:

1. Accept this Amended Complaint;
2. Require KU to file an Answer responding to the allegations herein;
3. Require KU to provide the records identified in Paragraph 27;
4. Require KU to verify that Meter No. [REDACTED] exclusively serves Complainants' residence;
5. Require KU to explain and document the basis for the disputed winter consumption reflected on the account and the calculation of the related charges and balances; 6. Require KU to provide written results of any meter verification, service verification, account audit, or technical investigation performed in response to this complaint; 7. Determine whether KU's disconnection and restoration actions complied with applicable statutes, Commission regulations, and approved tariffs governing residential electric service;
8. Review and reconcile disputed billing, corrected bills, installment-plan balances, adjustments, and account activity associated with Account No. 350014868334; 9. Require appropriate technical investigation into the abnormal winter consumption reflected on the account;
10. Award any billing corrections, adjustments, credits, refunds, or other relief supported by the findings of the Commission's investigation; and
11. Grant any further relief the Commission deems just and proper.

Complainants have previously provided supporting documentation and possess additional documentation, including billing records, usage records, photographs, correspondence, payment records, weatherization records, meter photographs, and other materials relevant to the issues raised herein. Complainants will provide any additional documentation, records, photographs, correspondence, witness information, or other evidence reasonably requested by the Commission and will cooperate fully with any investigation conducted in connection with this proceeding.

Complainants reserve the right to supplement this complaint with additional documentation, usage records, photographs, correspondence, technical records, witness statements, and other evidence obtained during the course of this proceeding.

Respectfully submitted,

/s/ Melissa Saurini

Melissa Saurini, Pro Se

/s/ Jonathan Jones

Jonathan Jones, Pro Se
241 Braxton Lane
Lily, Kentucky 40740

Email: [REDACTED]

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