

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

PAUL CURHAN

COMPLAINANT

VS.

THE UNION LIGHT, HEAT AND POWER
COMPANY

DEFENDANT

CASE NO. 92-442

ORDER TO SATISFY OR ANSWER

The Union Light, Heat and Power Company ("ULH&P") is hereby notified that it has been named as defendant in a formal complaint filed on October 16, 1992, a copy of which is attached hereto.

Pursuant to 807 KAR 5:001, Section 12, ULH&P is HEREBY ORDERED to satisfy the matters complained of or to file a written answer to the complaint within 10 days from the date of service of this Order.

Should documents of any kind be filed with the Commission in the course of this proceeding, the documents shall also be served on all parties of record.

Done at Frankfort, Kentucky, this 28th day of October, 1992.

PUBLIC SERVICE COMMISSION


Chairman


Vice Chairman


Commissioner

ATTEST:


Executive Director

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECORDED

Oct 16 10 44 AM '92

In the Matter of:

PAUL CURHAN

(Your Full Name)

COMPLAINANT

VS.

The Union Light, Heat and Power Company

(Name of Utility)

DEFENDANT

PUBLIC
COMMISSION

92-442

C O M P L A I N T

The complaint of

PAUL CURHAN

(Your Full Name)

respectfully shows:

(a)

PAUL CURHAN

(Your Full Name)

425 Sanford St. Apt. T-2 Covington Ky 41011

(Your Address)

(b)

The Union Light, Heat and Power Company

(Name of Utility)

107 Brent Sence Square, Covington, Ky 41011

(Address of Utility)

(c)

That: - See attached sheets -

(Describe here, attaching additional sheets if

necessary, the specific act, fully and clearly, or facts

that are the reason and basis for the complaint.)

Formal Complaint

PAUL CURHAN

vs

(Your Name)

(Utility Name)

Page 2

See attached


Wherefore, complainant asks to be charged at most
(Specifically state the

\$50.00 for the disputed billing period -
relief desired.)

thereby receiving \$200 in relief.

Dated at Coulington, Kentucky, this 30 day
(Your City)

of September, 1992.
(Month)



(Your Signature)

(Name and address of attorney, if any)

RECEIVED

OCT 16 1992

PUBLIC SERVICE
COMMISSION

PAUL CURHAN COMPLAINT STATEMENT - SECTION (C)

This describes the facts and the basis for my complaint against the Union Light, Heat and Power Company (ULH&P). I have taken this actions after non-satisfactory discussions with ULH&P management regarding an unusual charge.

The reason for the complaint is based on an extraordinary electric usage recorded for the billing period ending July 14, 1992 (\$249.19) -- an amount well in excess of any reasonable usage given the circumstances and well above my usage during the recent months before and after when usage patterns were not really different. Here are the facts:


1. Overall, my usage patterns have changed dramatically versus the previous summer (1991), as witnessed by other summer '92 months that were well below \$100 in usage (usually about \$30-50) during similar weather period in May, June and August. Please note that the previous summer I used to leave the air conditioning on all day, something I have not done this year. Also, this summer is much cooler than the previous summer, thereby requiring less energy.

2. I was out of the country for half of the July 14 period, using no energy at all. There was nobody in my apartment either.

3. ULH&P management actually agreed with me that this usage could, as they told me, "not have been consumed" during the billing period, and, since my meter was working when they checked it a few weeks ago, they hypothesized that I must have used this energy during previous months. I simply do not agree. Based on my pattern of energy consumption this year and the consistency of usage, something "strange" is going on -- and ULH&P cannot explain it. All they can say is that I must have used it "sometime." I find this explanation very unsatisfactory -- and therefore am not in a position to simply hand over \$250 for something that is not proven to be consumed by myself.

4. ULH&P understood this information and was confused about this situation, but could not resolve directly with me -- hence my action with the Kentucky Public Service Commission.

Please contact me with any questions. Thank you.


10/5/92