

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

JASON KREMER	)	
	)	
COMPLAINANT	)	
	)	CASE NO.
V.	)	2026-00254
	)	
DUKE ENERGY KENTUCKY, INC.	)	
	)	
DEFENDANT	)	

ORDER

On August 31, 2026, Complainant, Jason Kremer, Kremer Plumbing Services, LLC, tendered for filing a complaint against Duke Energy Kentucky, Inc. (Duke Kentucky) for natural gas service to 7857 Alexandria Pike, Alexandria, Kentucky 41001.¹

Pursuant to KRS 278.260, the Commission has jurisdiction over complaints regarding rates or service.² Commission regulation 807 KAR 5:001, Section 20(1)(c), requires each complaint to state fully, clearly and with reasonable certainty, the act or omission, of which failure to comply is alleged.³ Furthermore, 807 KAR 5:001, Section 20(4)(a), requires the Commission to examine the complaint to ascertain if the complaint establishes a *prima facie* case that the utility has violated a statute, regulation, tariff, or

¹ Complaint (filed Aug. 31, 2026).

² KRS 278.206.

³ 807 KAR 5:001, Section 20(1)(c).

order for which the Commission may grant relief.⁴ A complaint establishes a *prima facie* case when, on its face, it states sufficient allegations that, if uncontradicted by other evidence, would entitle the complainant to the requested relief. If a complaint fails to establish a *prima facie* case, it may be dismissed.

Mr. Kremer's complaint does not state fully, clearly and with reasonable certainty, an act or omission by Duke Kentucky of which failure to comply is alleged. Nor does Mr. Kremer currently allege a violation of a regulation, Commission Order, tariff or statute by Duke Kentucky.

In addition, public records available electronically from the Campbell County Property Valuation Administrator (PVA) indicate that the record owner of 7857 Alexandria Pike, Alexandria, Kentucky 41001, is Kremer Plumbing Services, LLC.⁵ On information and belief, Mr. Kremer is not an attorney licensed to practice law in Kentucky and no person may engage in the practice of law in Kentucky without first obtaining a license to practice.

The practice of law is any service rendered involving legal knowledge or legal advice, whether of representation, counsel or advocacy in or out of court, rendered in respect to the rights, duties, obligations, liabilities, or business relations of one requiring the services.⁶

⁴ 807 KAR 5:001, Section 20(4)(a).

⁵ Fred A. Macke, III, Cambell County PVA website at <https://pva.campbellcountykentucky.com/>.

⁶ Kentucky Supreme Court Rule 3.020.

It includes the representation of a business before a state administrative agency as Kentucky's highest court held in *Kentucky State Bar Association v. Henry Vogt Machine Co.*,⁷ which stated that

any attorney who is not licensed to practice in the State of Kentucky and who seeks to represent a client or employer before this Commission, must engage a member of the Kentucky Bar Association. It logically follows that if an unlicensed attorney may not represent a client before this Commission, neither may a layman.⁸

Commission regulations incorporate these sentiments. Commission regulation 807 KAR 5:001, Section 4(4), states in part: "A person shall not file a paper on behalf of another person, or otherwise represent another person, unless the person is an attorney licensed to practice law in Kentucky or an attorney who has complied with SCR 3.030(2)."

Based on the above, the Commission finds that Mr. Kremer's complaint fails to comply with the requirements of 807 KAR 5:001, Section 20(1)(c), by failing to establish a *prima facie* case that the utility has violated a statute, regulation, tariff, or order for which the Commission may grant relief. In addition, the Commission finds that Mr. Kremer's complaint fails to comply with Kentucky law and the requirements of 807 KAR 5:001, Section 4(4), by representation of a business before a state administrative agency.

In accordance with 807 KAR 5:001, Section 20(4)(a)(1), the Commission finds that Mr. Kremer should be granted 20 days from the service date of this Order to amend this complaint with the Commission as a *pro se* complainant, if an interest exists sufficient to establish standing, or to have an attorney licensed to practice law in Kentucky file a

⁷ *Kentucky State Bar Association v. Henry Vogt Machine Co.*, 416 S.W.2d 727 (Ky. 1967).

⁸ Administrative Case No. 249, *Practice Before the Commission by Attorneys Non-Licensed in the Commonwealth of Kentucky* (Ky. PSC June 15, 1981), Order at 2.

complaint if the issues raised therein are those of Kremer Plumbing Services, LLC to assert as a party in this proceeding. In addition, the amended complaint must state a *prima facie* case complying with 807 KAR 5:001, Section 20(1). Failure to file a properly file a timely amended complaint in this case will result in dismissal without prejudice. This Order should be served through the U.S. Postal Service, Certified Mail, Return Receipt Requested, and First-Class Mail upon Mr. Kremer at the address listed in the complaint.

IT IS THEREFORE ORDERED that:

1. The complaint filed by Jason Kremer is rejected for filing.
2. Either Jason Kremer, *pro se* complainant, or a proper representative of Kremer Plumbing Services, LLC shall have 20 days from the date of service of this Order to file an amended complaint with the Commission that conforms to the requirements of 807 KAR 5:001, Section 4(4), Section 20(1), and that states a *prima facie* case.
3. Failure to file a properly filed timely amended complaint in this case, which establishes a *prima facie* case in compliance with 807 KAR 5:001, Section 20, shall result in dismissal without prejudice.
4. The amended complaint may be filed with the Commission by U.S. Postal Service mail to 211 Sower Boulevard, Frankfort, Kentucky 40601 or by email to PSCED@ky.gov. Case number 2026-00254 shall be included in all filings with the Commission.
5. A copy of this Order shall be served on Mr. Jason Kremer, by U.S. Postal Service, Certified Mail, Return Receipt Requested, and First-Class Mail at 7855 Alexandria Pike, Suite A, Alexandria, Kentucky 41001. Service shall be considered complete on the first day the U.S. Postal Service attempts delivery of the certified mail.

Entered on this 23rd day of September, 2026.

PUBLIC SERVICE COMMISSION



Angie Hatton
Chair



Mary Pat Regan
Vice Chair



Andrew W. Wood
Commissioner



Barry L. Mayfield
Commissioner

ATTEST:



Justin McNeil
Executive Director

Service List for Case 2026-00254

Jason Kremer
7855 Alexandria Pike
Suite A
Alexandria, KY 41001

* Duke Energy Kentucky, Inc.
139 East Fourth Street
Cincinnati, OH 45202