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COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION
CASE NO. 2023-00052

PUBLIC SERVICE
COMMISSION

PHILIP WESLEY WHITLEY

COMPLAINANT

V.

NATURAL ENERGY UTILITY CORPORATION

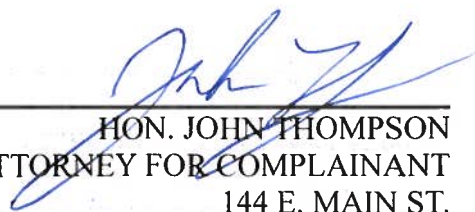
DEFENDANT

MOTION

Comes now the Complainant by and through counsel and hereby moves for an order directing the Defendant to reimburse Complainant the sums displayed in the attached in the exhibits attached hereto provided by Complainant. Complainant further requests punitive damages for Defendant's acts which this Commission acknowledged as constituting a prima facie case of price gouging. In the alternative, Complainant requests that this Commission issue a denial letter to Complainant and his counsel declaring that the administrative relief requested by Complainant is denied and an indication of whether any other administrative relief is available.

As grounds for said motion, Complainant states that due to Defendant's actions, including price gouging, Complainant was compelled to make alternate arrangements for the heating of his property and incurred expenses that he would otherwise not have incurred but for Defendant's agents acting in bad faith and engaging in price gouging.

RESPECTFULLY SUBMITTED,



HON. JOHN THOMPSON
ATTORNEY FOR COMPLAINANT
144 E. MAIN ST.
GRAYSON, KY 41143

Certificate of Service:

I hereby certify that a copy of the foregoing has been served upon the following via
first class mail this 29th day of March, 2024:

Original to:

Public Service Commission
P.O. Box 615
211 Sower Boulevard
Frankfort, KY 40602-0615

Hon. John N. Hughes
7106 Frankfort Road
Versailles, KY 40383

Natural Energy Utility Corporation
2560 Hoods Creek Pike
Ashland, KY 41102

