

10 South Main Street P O Box 226 New Castle, KY 40050 502.845 2222 Fax 502.845.8006 Alan Q. Jaring David S. Sullivan Neil S. Hackworth, Of Counsel

www.zsfirm.com

July 16, 2024

By Appointment Doly: 600 Main Street Shelbyvile, KY 40065 502.647.1675 Fax 502.845.8006

# RECEIVED

JUL 16 2024

PUBLIC SERVICE COMMISSION

Ms. Linda C. Bridwell, P.E. Executive Director Kentucky Public Service Commission 211 Sower Boulevard Frankfort, KY 40602

> RE: Antoinette C. Taylor vs. Shelby Energy Cooperative, Inc Case No. 2024-00117

Dear Ms. Bridwell:

Please find enclosed for filing Shelby Energy Cooperative's Response to Commission Staff's First Request for Information with regard to the above-captioned matter.

This is to certify that said Response was e-mailed to the Commission's e-mail address, <u>PSCED@ky.gov</u>, on July 16, 2024. A copy of the Response was also mailed to the Commission and to the Complainant, Antoinette Taylor, at the address listed on the Certification of Service by placing the same in the U.S. Mail, postage prepaid, on July 16, 2024.

Please let me know if you have any questions or concerns.

Very truly yours,

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AQZ:cdb

Enc.

cc: Shelby Energy Cooperative, Inc.

# COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:	)
ANTOINETTE C. TAYLOR	)
COMPLAINANT	) ) )
V.	) CASE NO. ) 2024-00117
SHELBY ENERGY COOPERATIVE, INC.	)
DEFENDANT	)

# RESPONSES TO COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO SHELBY ENERGY COOPERATIVE, INC. DATED JULY 12, 2024

### COMMONWEALTH OF KENTUCKY

### BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:	)
ANTOINETTE C. TAYLOR	)
COMPLAINANT	)
V.	) CASE NO. ) 2024-00117
SHELBY ENERGY COOPERATIVE, INC.	)
DEFENDANT	)

### **VERIFICATION OF MICHAEL MORIARTY**

))

)

## COMMONWEALTH OF KENTUCKY

### COUNTY OF SHELBY

Michael Moriarty, Chief Financial Officer of Shelby Energy Cooperative, Inc., being duly sworn, states that he has supervised the preparation of certain responses to Commission Staff's First Request for Information in the above-referenced case and that the matters and things set forth therein are true and accurate to the best of his knowledge, information and belief, formed after reasonable inquiry.

Michael Moriarty

The foregoing Verification was signed, acknowledged and sworn to before me this <u>15</u> day of July, 2024, by Michael Moriarty, Chief Financial Officer of Shelby Energy Cooperative, Inc.

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Notary Commission No. KYNP38593

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Commission expiration: 12

## **PSC'S REQUEST 1**

## Page 1 of 3

## SHELBY ENERGY COOPERATIVE, INC.

## PSC CASE NO. 2024-00117

## **RESPONSE TO REQUEST FOR INFORMATION**

## **PSC'S REQUEST FOR INFORMATION DATED 7/12/24**

## **REQUEST 1**

## **RESPONSIBLE PARTY:** Michael Moriarty

**Request 1.** Refer to Shelby Energy's Answer to the Complaint, Exhibit B, page 28, which states that Ms. Taylor called Shelby Energy on or about February 20, 2024, when she received a disconnect notice and was upset about the "threatening letter." Provide a copy of the disconnect notice sent to Ms. Taylor.

**Response 1.** Please see attached copy of the disconnect notice.

**PSC'S REQUEST 1** 

Page 2 of 3



620 Old Finchville Road Shelbyville, KY 40065

YNNN

Phone (Toll Free): ..... 1-800-292-6585 Online: ...... www.shelbyenergy.com CUSTOMER NAME ANTOINETTE C TAYLOR Bill Date: Account Number

01/30/2024

Service Description: VIGO RD 6035 HSE



TOTAL AMOUNT DUE: \$474.19

# REMINDER NOTICE

Date of Notice: 02/16/2024

# **DUE DATE: Immediately DISCONNECT DATE: February 29, 2024**

We know a good credit history is important to you. We understand that bills can be misplaced or overlooked. For this reason, we are sending this reminder that you have a past-due balance on your account.

If the above amount is not received in our office before the disconnect date -- your service will be disconnected without further notice.

If payment is not made and service is disconnected, the past due amount and a \$35.00 reconnect fee must be paid before service is restored. Additionally, you may be required to increase your security deposit or pay a deposit if you do not already have a security deposit on your account.

Please read the following page for additional payment information or contact our office to discuss your account.

	PLE	ASE RETURN BOTTOM PORT	ION WITH YOUR PAYMENT		-
SEND SHELBY ENERGY COOPERATIVE, INC. A Touchstone Energy* Cooperative P. O. Box 309 Shelbyville, KY 40066-0309 PAY YOUR BILL 24/7 ONLINE: Check or credit/debit card at www.shelbyenergy.com or download the mobile app.		Notice Date Account Number	02/16/2024		
		Amount Due Immediately	474.19		
Phone: (502)633-44	420 or Toll Free: (800) 2	92-6585	SHELBY ENERGY C	OOPERATIVE	
311 1 AV 0.	.507	5 311	PO BOX 309 SHELBYVILLE KY 4		
ANTOINETTE (		C-1	11., 313, 1., 111, ., 161, 1111, .1.		1017428

## NOTICE OF TERMINATION OF UTILITY SERVICE

Notice is hereby given that your service will be terminated as indicated on the enclosed notice in keeping with our policy for non-payment of your utility bill unless payment of the past-due balance, along with any applicable fees is paid immediately.

You have the right to protest the discontinuance or this service by contacting the cooperative office at the address or phone number shown on your Electric Statement. An employee will the day during discublished hours of operation to answer your questions regarding your bill or to resolve disputes over the amount of your bill. This employee has the authority to retain your service by negotiating a partial payment plan or by accepting a partial payment where good faith is shown in meeting your financial obligation.

You are further advised that in the event of existing illness or infirmity on your premises, service will not be discontinued within thirty (30) days after the date of this notice, provided you obtain a certificate signed by a physician, a registered nurse, or a public health official stating that in the opinion of the person making the certification, discontinuance of service will aggravate the existing illness or infirmity.

If you are unable to meet the obligation of this utility bill, you may, under certain conditions, receive aid from local, state, or federal programs. You may inquire concerning this aid by contacting your local Community Action Agency. Find your local office at www.capky.org or contact the appropriate office listed below:

MULTI-PURPOSE COMMUNITY ACTION AGENCY 207 Washington Street, Shelbyville, KY 40066 502-633-7162 | Fax: 502-633-7254 Serving: Bullitt, Shelby and Spencer Counties TRI-COUNTY COMMUNITY ACTION AGENCY 1015 Dispatchers Way, LaGrange, KY 40031 502-222-1349 | Fax: 502-222-0968 Serving: Henry, Oldham and Trimble Counties

Office Hours: 7:00 a.m. - 4:00 p.m., Monday - Friday Office Phone: 800-292-6585

### Payment Options

Pay by Phone - Call 833-284-5049 to pay over-the-phone with a credit card or e-check.

Pay Online - Visit www.shelbyenergy.com/smarthub or download the SmartHub mobile app to make payments and manage your account online or from your mobile device.

Mail Payments to Shelby Energy Cooperative, P.O. Box 309, Shelbyville, KY 40066

Payments can be delivered to our office at 620 Old Finchville Road, Shelbyville, KY 40065. After normal business hours, members are encouraged to use the night drop box. Any payments place in this drop-box will be processed on the following business day.

#### Please make the appropriate payment or contact our office immediately to discuss your payment options.

Failure to receive the Bill or Delinquent Notice does not waive any late payment penalty, other fees or disconnection of service. Please contact Shelby Energy Cooperative at 800-292-6585 to update your contact information.

## **PSC'S REQUEST 2**

## Page 1 of 3

## SHELBY ENERGY COOPERATIVE, INC.

## PSC CASE NO. 2024-00117

## **RESPONSE TO REQUEST FOR INFORMATION**

## **PSC'S REQUEST FOR INFORMATION DATED 7/12/24**

## **REQUEST 2**

## **RESPONSIBLE PARTY:** Michael Moriarty

**Request 2.** Refer to Shelby Energy's Answer to Complaint, Exhibit B, page 26, which states that Ms. Taylor was disconnected for non-pay.

- a. Confirm that notice was provided, and appropriate time was given to Ms. Taylor according to the tariff. If not confirmed, explain why not.
- b. Provide a copy of the disconnect notice sent to Ms. Taylor.

**Response 2a.** Shelby Energy confirms that the notice dated 3/18/2024 was provided more than 10 days prior to the disconnect date of 4/4/2024, and the disconnect date was more than 27 days after the mailing date of the original unpaid bill which was dated 2/29/2024. The notice and disconnection were both in compliance with Shelby Energy's Tariff Sheet 227.2.

**Response 2b.** Please see attached copy of the disconnection notice on pages 2 and 3 of Shelby Energy's response to PSC's Request number 2.

PSC'S REQUEST 2 Page 2 of 3



620 Old Finchville Road Shelbyville, KY 40065

Phone (Toll Free): ..... 1-800-292-6585 Online: ..... www.shelbyenergy.com CUSTOMER NAMEANTOINETTE C TAYLORBill Date:02/29/2024Account NumberService Description:VIGO RD 6035 HSE



# **REMINDER NOTICE**

Date of Notice: 03/18/2024

## DUE DATE: Immediately DISCONNECT DATE: March 30, 2024

TOTAL AMOUNT DUE: \$305.59

We know a good credit history is important to you. We understand that bills can be misplaced or overlooked. For this reason, we are sending this reminder that you have a past-due balance on your account.

If the above amount is not received in our office before the disconnect date -- your service will be disconnected without further notice.

If payment is not made and service is disconnected, the past due amount and a \$35.00 reconnect fee must be paid before service is restored. Additionally, you may be required to increase your security deposit or pay a deposit if you do not already have a security deposit on your account.

Please read the following page for additional payment information or contact our office to discuss your account.

	PLEASE RETURN BOTTOM PORTION WITH YOUR PAYMENT					
SEND		COOPERATIVE, INC. astone Energy <sup>®</sup> Cooperative K	Notice Date Account Number	03/18/2024		
or download the	k or credit/debit card at www		Amount Due Immediately	305.59		
296 0 SP	0.640 TE C TAYLOR	5 296 C-1	SHELBY ENERGY C PO BOX 309 SHELBYVILLE KY 40   'ı  <sup>  </sup>  ı   <sup> </sup>  ı  <sup>  </sup>    <sup>  </sup>	04		

## NOTICE OF TERMINATION OF UTILITY SERVICE

Notice is hereby given that your service will be terminated as indicated on the enclosed notice in keeping with our policy for non-payment of your utility bill unless payment of the past-due balance, along with any applicable fees is paid immediately.

You have the right to protest the discontinuance or this service by contracting the cooperative office at the address or phone number shown on your Electric Statement. An employee will be on duty during the published hours of operation to answer your questions regarding your bill or to resolve disputes over the amount of your bill. This employee has the authority to retain your service by negotiating a partial payment plan or by accepting a partial payment where good faith is shown in meeting your financial obligation.

You are further advised that in the event of existing illness or infirmity on your premises, service will not be discontinued within thirty (30) days after the date of this notice, provided you obtain a certificate signed by a physician, a registered nurse, or a public health official stating that in the opinion of the person making the certification, discontinuance of service will aggravate the existing illness or infirmity.

If you are unable to meet the obligation of this utility bill, you may, under certain conditions, receive aid from local, state, or federal programs. You may inquire concerning this aid by contacting your local Community Action Agency. Find your local office at www.capky.org or comtact the approprimate office listed below:

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