

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

JASON KREMER AND KREMER PLUMBING
SERVICES, LLC

COMPLAINANT

V.

NORTHERN KENTUCKY WATER DISTRICT

DEFENDANT

CASE NO.
2025-00286

ORDER

On August 15, 2025, Jason Kremer and Kremer Plumbing Services, LLC tendered for filing a complaint against Northern Kentucky Water District (Northern Kentucky District).

Pursuant to KRS 278.260, the Commission has jurisdiction over complaints regarding rates or service.¹ 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.² 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 order for which the Commission may grant relief.³ A complaint establishes a *prima facie*

¹ KRS 278.206.

² 807 KAR 5:001, Section 20(1)(c).

³ 807 KAR 5:001, Section 20(4)(a).

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 Northern Kentucky District of which failure to comply is alleged. Nor does Mr. Kremer currently allege a violation of a regulation, Commission Order, tariff or statute by Northern Kentucky District.

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.⁴ 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.⁵

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.*,⁶ 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

⁴ Daniel Braun, Campbell County PVA website at <https://pva.campbellcountykentucky.com/>.

⁵ Kentucky Supreme Court Rule 3.020.

⁶ *Kentucky State Bar Association v. Henry Vogt Machine Co.*, 416 S.W.2d 727 (Ky. 1967).

Kentucky Bar Association. It logically follows that if an unlicensed attorney may not represent a client before this Commission, neither may a layman.⁷

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 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 filed timely amended complaint in this case will result in dismissal without prejudice. This

⁷ Administrative Case No. 249, *Practice Before the Commission by Attorneys Non-Licensed in the Commonwealth of Kentucky* (Ky. PSC June 15, 1981) at 2.

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 2025-00286 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, Alexandria, Kentucky 41001. Service shall be considered complete on the first day the U.S. Postal Service attempts delivery of the certified mail.

PUBLIC SERVICE COMMISSION


Chairman


Commissioner


Commissioner

ATTEST:

 RP
Executive Director



Jason Kremer
7855 Alexandria Pike
Suite A
Alexandria, KY 41001

*Northern Kentucky Water District
2835 Crescent Springs Road
P. O. Box 18640
Erlanger, KY 41018-0640