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July 11, 2025

Kentucky Public Service Commission
211 Sower Blvd
P O Box 615
Frankfort, KY 40602

RE: Complaint

Dear Commissioners:

Enclosed please find an original unbound and ten (10) copies of a Complaint against Duke Energy on behalf of my client, Gary A. Miller.

If there are any questions or concerns regarding this matter, please contact me by telephone at (859) 957-0722 or by email at mdixon@lablaw.org.

Sincerely,



Melissa R. Dixon, Esq.

RECEIVED

JUL 15 2025

**PUBLIC SERVICE
COMMISSION**

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the matter of:

Gary A. Miller)
)
Complainant)
)
v.)
)
Duke Energy)
)
Defendant)

COMPLAINT

The Complaint of Gary A. Miller respectfully shows:

- (a) Gary A. Miller
4415 Vermont Ave
Covington, KY 41015
- (b) Duke Energy
139 E 4th St
Cincinnati, OH 45202

(c) Gary Miller owns and resides in the real property located at 4415 Vermont Avenue, Covington, Kentucky 41015. Mr. Miller allowed his grandson, Allen Michael Foley, and his grandson's wife, Kayla Foley, to move into the real property with him.

At an unknown time, Duke Energy permitted Kayla Foley to transfer the account for electric services at 4415 Vermont Avenue, Covington, Kentucky 41015, from Mr. Miller's name into the name of her husband, Allen Michael Foley. The

account was subsequently transferred into the name of Christian Foley and then into the name of Kirsten Foley.

Duke Energy permitted the transfer without the authorization or knowledge of Gary Miller, the legal owner of the real property serviced by this account. After the transfer occurred, Kayla Foley, Allen Michael Foley, Christian Foley, and/or Kirsten Foley, incurred extensive unpaid utility charges which resulted in the disconnection of electric services at the real property without notice to Mr. Miller or the opportunity to otherwise cure the delinquency.

Mr. Miller has attempted to obtain information regarding any authorization received by Duke Energy to transfer the electric account out of his name. However, Duke Energy has refused to provide such information or otherwise re-establish electric service at this address.

The disconnection of electric services at 4415 Vermont Avenue, Covington, Kentucky 41015, was the direct and proximate result of Duke Energy's actions in permitting the account to be transferred to another person without Mr. Miller's authorization or permission. In doing so, Duke Energy prevented Mr. Miller from having knowledge of outstanding charges on the account and from having the ability to timely cure any outstanding charges.

Wherefore, the Complainant asks that Duke Energy be required to produce documentation supporting any authorization given by Mr. Miller to transfer the account for 4415 Vermont Avenue, Covington, Kentucky 41015. If no such

documentation exists, demand is made for Duke Energy to restore electric services at that address as soon as possible.

Dated July 11, 2025.

Respectfully submitted,



Melissa R. Dixon, Esq. (KBA 89817)

Legal Aid of the Bluegrass, Inc.

104 East 7th Street

Covington, KY 41011

Telephone: (859) 957-0722

Facsimile: (859) 431-3009

Email: mdixon@lablaw.org

CERTIFICATE OF SERVICE

The undersigned hereby certifies that pursuant to 807 KAR 5:001, an original unbound and ten (10) unbound copies of the foregoing complaint have been served upon the Kentucky Public Service Commission, 211 Sower Boulevard, P. O. Box 615, Frankfort, KY 40602, on the 11th day of July, 2025.



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