

In the matter of:

RKP Hospitality LLC

**COMPLAINANT**

VS.

Bluegrass Water Utility (Sewage)

**DEFENDANT**

**COMPLAINT**

The complaint of respectfully shows:

(a)

RKP Hospitality DBA Quality Inn, Managed by Kishan Patel  
385 Cherry Blossom Way Georgetown KY 40324



(b)

Bluegrass Water Utility Co  
385 Cherry Blossom Way Georgetown KY 40324



(c) That:

I am requesting that the Kentucky Public Service Commission immediately escalate my informal complaint to a formal complaint and issue relief to restore wastewater service pending investigation.

This request is not based on denying that a balance exists, but on the manner in which the utility has enforced it and the immediate, irreparable harm being caused. The previous status quo should be preserved pending formal review considering the utility's unreasonable and inequitable enforcement after meaningfully denying me the opportunity to cure or negotiate. This is in the best interest of both parties as well as hotel guests, employees, creditors and other vendors and utilities. Disconnection of the sewage utility creates a health risk, forcing the hotel to shut down, displacing residents, halting revenue and operations which will deny the possibility of solving the financial dispute at a later time.

**Key facts:**

- The utility allowed a wastewater balance to accumulate over about five years without disconnection or enforcement action with the previous ownership/management structure.
- I became sole owner/operator of the business approximately six months ago through a change in LLC ownership. The debt was not disclosed by the seller during the transaction or assumed by me in our agreement.
- **Upon becoming aware of the issue (When the Utility Performed an unexpected and unlawful disconnection without due notice), I made repeated attempts to:**
  - Escalate the matter internally
  - Request to review the previous bills and discuss payment options and or negotiations
  - Offer to create a new account, pay the current bill and work toward resolving the balance from my time as well as investigate the previous balance.
- Despite these good faith efforts, the utility:
  - Refused to provide billing and account information
  - Refused escalation beyond customer service, calling into the helpline and being advised a supervisor would call back after to repeat what they said.
  - Refused to allow me to speak to billing department and negotiate the bill
  - Proceeded with disconnection even after an informal complaint was filed with the KY PSC.
  - Sent past due bills, sent payment option, sent what they used for justification to deny new account, on the day of disconnection only due to response requirement of the PSC inquiry.

**The result is immediate and severe:**

- My business is being shut down, impacting lodging, operations and revenue which would result in bankruptcy before I can complete legal remedies against the prior owner.
- Guests will be displaced. The property has permanent tenants and short and medium term guests.
- Employees will lose their jobs
- Other Creditors, Vendors, Utilities and Taxes will not be paid.

**This outcome is particularly concerning given that the utility took no action for years, yet is now declining to extend good will or negotiate a resolution in good faith given they have been made aware that I was also wronged by the same person who wronged them initially. If given a reasonable amount of time I have no issue to discuss a reasonable settlement or verify the legal liability and recourse available between current and/or previous ownership.**

I am requesting the Commission's intervention on the following basis:

1. I have been denied many options available to me on the Kentucky PSC's Customer Bill of Rights
2. I have demonstrated good faith by attempting to resolve the issue and offering to pay current charges and enter into a payment plan.
3. The disconnection has created irreparable harm that cannot be remedied after the fact.
4. Maintaining the current shutoff status quo will effectively decide the outcome of this matter before a formal review can occur
5. The utility's prolonged inaction followed by immediate disconnection constitutes unreasonable and inequitable enforcement.

**Requested relief:**

- Immediate escalation to a formal complaint proceeding
- Temporary reconnection of wastewater service pending investigation
- Direction to the utility to engage in a reasonable payment arrangement process

I am prepared to:

- Set up an account in my name and pay the current charges from when I was made aware of this situation immediately.
- Make a good faith payment toward the balance that accrued since I took possession.
- Work in good faith for this investigation and enter into a structured repayment plan as necessary pending review of obligation of responsibility between the utility, current, and previous ownership.

**I respectfully request expedited handling due to the ongoing business closure creating health, humanitarian, and financial harm for guests and staff of the property.**

Sincerely,

Kishan Patel

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Wherefore, complainant asks

- Temporary reconnection of wastewater service pending investigation
- Direction to the utility to engage in a reasonable payment arrangement process
- Setting up a new account for the current time frame, accept payment + enter payment plan if necessary depending on balance and time frame offered.
- Provide information, time, explanations as needed for reviewing/investigating/determining payment responsibility and structure for previous time frame

Dated at Georgetown Kentucky, this 22nd day of April, 2026.

*K. Patel*

Kishan Patel  
(Your Signature\*)

\_\_\_\_\_  
Address of Attorney, if any) Date (Name and

\*Complaints by corporations or associations, or any other organization having the right to file a complaint, must be signed by its attorney and show his post office address. No oral or unsigned complaints will be entertained or acted upon by the commission.

