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**PUBLIC SERVICE
COMMISSION**

**MOTION TO INCORPORATE BY REFERENCE AND FOR EXPEDITED
HEARINGS**

Come the Complainants, Teresa Biagi and Raphe Ellis, pro se, and respectfully move the Commission to formally incorporate the records and public filings of Defendant's pending Rate Adjustment Request (**Case No. 2026-00094**) into the active record of this matter.

In support of this Motion, Complainants state that Defendant KAW is actively seeking a multi-million-dollar system improvement rate adjustment from this Commission, claiming total infrastructure and tariff compliance. Simultaneously, as documented by the six uncontested filings in this case, Defendant's executive management is consciously operating an un-easemented, illegal multi-household distribution main across Complainants' private organic farm in direct violation of **807 KAR 5:066**.

Because Defendant's chief counsel is actively weaponizing the Commission's administrative backlog to stall this matter while pursuing a separate \$108 million rate increase, Complainants move the Commission to cross-reference these files and expedite an Order of Service to prevent the Defendant from further evading accountability.