

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:	CASE NO. 2026-00154
MELISSA SAURINI AND JONATHAN JONES Complainants v. KENTUCKY UTILITIES COMPANY Defendant	RECEIVED SEP 10 2026 PUBLIC SERVICE COMMISSION

**COMPLAINANTS' FIRST REQUEST FOR INFORMATION TO KENTUCKY UTILITIES
COMPANY**

Melissa Saurini and Jonathan Jones, appearing pro se, pursuant to the Commission's September 10, 2026 Order and 807 KAR 5:001, Section 12, respectfully submit the following First Request for Information to Kentucky Utilities Company ("KU").

These requests are directed toward the factual matters raised in the Amended Formal Complaint and KU's July 30, 2026 Answer, including billing accuracy, meter-data configuration, Residential Time-of-Day service, interval usage, account adjustments, disconnection and reconnection, customer communications, meter association, electrical-service reliability, and KU's subsequent inspection of the premises.

Unless otherwise stated, the relevant period is September 1, 2025 through the present. Where KU relies upon historical usage predating September 1, 2025 as a comparison, the request includes the historical period upon which KU relied.

For each request, please provide the information in electronic form where reasonably available. If any requested information has already been filed in this proceeding, KU may identify its precise location in the case record as permitted by 807 KAR 5:001, Section 12.

REQUEST NO. 1 - COMPLETE INTERVAL USAGE DATA

Provide the complete AMI or advanced-meter interval usage data for Meter No. [REDACTED] from September 1, 2025 through the present, including all available hourly, 30-minute, 15-minute, or other interval-level data maintained by KU. If the information is maintained electronically or in spreadsheet format, please provide it in its native electronic or spreadsheet format.

REQUEST NO. 2 - METER EVENT AND DIAGNOSTIC LOGS

Provide all meter event logs, diagnostic logs, exception reports, alarms, error codes, communication-failure records, power-loss events, voltage-related events, tamper alerts, configuration changes, resets, firmware changes, remote-connect events, remote-disconnect events, and other system-generated events associated with Meter No. [REDACTED] from September 1, 2025 through the present.

**REQUEST NO. 3 - DISCOVERY AND CORRECTION OF THE OCTOBER 2025 BILLING/METER-DATA
ERROR**

In its Answer, Kentucky Utilities Company ("KU") states that the October 2025 bill initially reflected zero usage because of an error in the setup of the meter data associated with the Complainants' Residential Time-of-Day service.

Complainants state that the October 2025 billing problem was not identified and addressed until after Melissa Saurini repeatedly contacted KU concerning the accuracy of the account and bills.

Please provide the following information:

- a.** State the exact date and, if available, time when KU first became aware that the October 2025 bill, underlying meter data, account configuration, or related billing information was incorrect.
- b.** Identify the KU employee, contractor, department, automated system, or other person or process that first identified the error.
- c.** State whether KU's discovery of the error resulted, directly or indirectly, from any telephone call, complaint, billing dispute, inquiry, online submission, email, or other communication made by Melissa Saurini or Jonathan Jones.
- d.** If the answer to Request No. 3(c) is yes, identify each customer contact that caused, contributed to, or preceded KU's investigation or discovery of the error, including the date, approximate time, method of communication, and subject of the contact.
- e.** Produce all account notes, customer-service notes, call logs, call recordings, complaint records, escalation records, supervisor notes, internal messages, emails, billing notes, meter-data notes, work orders, exception reports, investigation records, and other documents relating to those customer contacts and KU's subsequent investigation of the October 2025 bill.
- f.** State whether KU had identified the October 2025 billing or meter-data error before Melissa Saurini began questioning or disputing the accuracy of the bills.
- g.** If KU contends that the error was identified before the Complainants raised concerns, identify the exact date of that discovery and produce the records documenting it.
- h.** State the date on which the underlying error first occurred and the amount of time that elapsed between the occurrence of the error and KU's discovery of it.
- i.** Describe specifically and in technical detail the nature of the error, including whether it involved the meter, meter programming, Residential Time-of-Day configuration, meter-data management system, billing system, account configuration, rate code, data transfer, interval data, or another component.
- j.** Explain how and why the error occurred.
- k.** State whether the error was caused by a manual action, automated process, system configuration, programming issue, data-transfer problem, employee action, or another cause.
- l.** Identify every KU employee, contractor, department, supervisor, or system involved in investigating, reviewing, correcting, or approving the correction of the error.
- m.** Explain each action KU took to correct the problem and identify the date on which each corrective action occurred.
- n.** State whether the correction involved any change, replacement, recalculation, reprocessing, estimation, substitution, adjustment, or modification of meter readings, interval data, billing data, account data, rate information, or other information associated with the account.
- o.** Identify every item of account, meter, usage, or billing data that was changed, corrected, recalculated, substituted, estimated, reprocessed, or otherwise modified as part of the correction.
- p.** Produce the complete available audit trail showing:

1. When the erroneous information was created or entered;
 2. What erroneous information was recorded;
 3. When KU first identified the problem;
 4. Who or what system identified it;
 5. Each change subsequently made;
 6. Who or what system made or authorized each change;
 7. The original values;
 8. The corrected values;
 9. The date and time of each change; and
 10. The date the corrected bill was generated.
- q. State whether KU had any automated validation, billing review, meter-data validation, exception-reporting, quality-control, auditing, or other system in place that was capable of identifying the error before the Complainants contacted KU.
 - r. If such a system existed, explain why it did not identify or correct the error before the Complainants raised concerns.
 - s. If no such system existed, state that fact.
 - t. State whether the October 2025 error affected any subsequent billing period, meter-data calculation, account balance, Residential Time-of-Day calculation, security deposit calculation, payment arrangement, late charge, disconnection determination, or other amount charged to the Complainants.
 - u. If KU contends that the October 2025 error did not affect any later billing period or account calculation, identify the records, calculations, testing, or analysis upon which KU relies for that conclusion.
 - v. Produce all documents, calculations, spreadsheets, screenshots, system reports, internal communications, investigation records, billing records, meter-data records, and other information upon which KU relies in responding to this Request.

REQUEST NO. 4 - SOURCE OF CORRECTED OCTOBER 2025 USAGE

KU states that after correcting the meter-data issue, it issued a corrected October 2025 bill based on "actual usage as recorded by the meter." Provide the underlying meter readings and interval data used to calculate the corrected bill and explain how KU determined that the data represented actual usage accurately attributable to the Complainants' residence.

REQUEST NO. 5 - BILLING CALCULATIONS

Provide a complete calculation and reconciliation of each bill issued from September 1, 2025 through the present, showing separately:

- a. Metered kWh
- b. On-peak kWh
- c. Off-peak kWh
- d. Applicable rates
- e. Customer charges

- f.** Fuel or adjustment charges
- g.** Taxes and fees
- h.** Late charges
- i.** Security-deposit charges
- j.** Installment-plan amounts
- k.** Credits
- l.** Corrections or reversals
- m.** Any other amount added to or removed from the account

REQUEST NO. 6 - HISTORICAL-USAGE COMPARISON

KU states in Paragraph 7 of its Answer that winter 2025-2026 electrical usage was "consistent with past electrical usage registered by this meter at the premise." Please:

- a.** Identify the exact historical periods KU compared with winter 2025-2026
- b.** Provide the monthly and interval usage relied upon
- c.** Identify the methodology used to determine that the usage was consistent
- d.** Identify whether weather, heating-degree days, occupancy, rate changes, meter changes, or other variables were considered
- e.** Produce all reports, calculations, spreadsheets, analyses, graphs, or other documents supporting KU's statement
- f.** Identify the witness or employee who determined that the usage was consistent with historical usage

REQUEST NO. 7 - RESIDENTIAL TIME-OF-DAY CONFIGURATION

Provide all records regarding the enrollment and configuration of the account under KU's Residential Time-of-Day ("RTOD") rate, including:

- a.** Enrollment date
- b.** Effective date
- c.** Meter-programming or billing-system changes
- d.** Rate-code changes
- e.** On-peak and off-peak configuration applicable during each billing period
- f.** Any errors, warnings, exceptions, or corrections occurring during enrollment or implementation
- g.** Any internal records reflecting whether the account was properly configured for RTOD service

REQUEST NO. 8 - METER TESTING

Provide all records of any test, inspection, accuracy verification, field check, diagnostic check, or other evaluation of Meter No. [REDACTED] from January 1, 2024 through the present. For each test or inspection, state:

- a.** Date
- b.** Person performing it
- c.** Test performed
- d.** Equipment or procedure used

- e. Results
- f. Accuracy percentage, if applicable
- g. Whether the meter passed or failed KU's applicable standards

If KU has not performed an accuracy test of the meter during this period, please state that fact.

REQUEST NO. 9 - METER INSTALLATION AND ASSOCIATION HISTORY

Provide records sufficient to establish the complete installation and association history of Meter No. [REDACTED] at the premises, including:

- a. Installation date
- b. Prior meters serving the premises
- c. Meter exchanges
- d. Meter numbers
- e. Meter-location records
- f. Service-point identifiers
- g. Premise identifiers
- h. Account-to-meter association records
- i. Any corrections made to the association between the account, meter, premise, or service point

REQUEST NO. 10 - KU'S POST-COMPLAINT SITE VISIT

KU states in Paragraph 24 of its Answer that after receiving the Commission's Order, KU technicians visited the premises and confirmed that Meter No. [REDACTED] serves only the Complainants' residence. Provide:

- a. Date and time of every such visit
- b. Names or job titles of the technicians
- c. Work orders
- d. Field notes
- e. Inspection reports
- f. Photographs
- g. Test results
- h. Meter readings
- i. Diagrams or service maps
- j. GPS or service-location records maintained as part of the work order
- k. The specific procedure used to determine what electrical loads Meter No. [REDACTED] serves
- l. All other documents supporting KU's conclusion that the meter exclusively serves the Complainants' residence

REQUEST NO. 11 - METHOD USED TO EXCLUDE CROSSED OR SHARED LOADS

Explain specifically how KU determined that there are no crossed, shared, incorrectly routed, or improperly associated loads on the service measured by Meter No. [REDACTED]. State whether KU:

- a. De-energized the meter or service during testing

- b.** Performed load testing
- c.** Traced service conductors
- d.** Examined neighboring meter configurations
- e.** Compared meter consumption while loads were switched on or off
- f.** Inspected the service entrance
- g.** Used any other testing method

Produce documentation supporting the answer.

REQUEST NO. 12 - SERVICE MAPS AND ELECTRICAL CONFIGURATION

Provide any KU-maintained map, service diagram, transformer record, meter-location record, service-point diagram, or similar record showing the electrical-service configuration supplying the Complainants' residence and the immediately associated service infrastructure. This request does not seek proprietary system-wide infrastructure information unrelated to the premises.

REQUEST NO. 13 - TRANSFORMER AND SERVICE EQUIPMENT

Identify the transformer and KU-owned service equipment supplying the Complainants' residence and provide records of inspections, repairs, replacements, trouble reports, overload events, voltage complaints, or service-related work involving that equipment from September 1, 2025 through the present.

REQUEST NO. 14 - FLICKERING AND POWER-QUALITY ISSUES

KU states in Paragraph 20 of its Answer that it has not located communications from Complainants reporting reliability issues at the premises. Please:

- a.** Describe the search KU performed before making that statement
- b.** Identify all databases, customer-service systems, call records, online submissions, emails, work-order systems, and other repositories searched
- c.** Identify the search terms, account identifiers, telephone numbers, addresses, or other criteria used
- d.** Produce all records reflecting complaints, reports, inquiries, field visits, voltage concerns, flickering, power-quality concerns, meter concerns, high-usage concerns, or electrical irregularities associated with the account or service address
- e.** State whether KU searched communications made by both Melissa Saurini and Jonathan Jones

REQUEST NO. 15 - CUSTOMER COMMUNICATIONS

KU states that Complainants contacted KU several times from September 2025 through May 2026 regarding RTOD service, the corrected October bill, a security-deposit installment plan, and disconnection issues. Produce the complete records of those contacts, including:

- a.** Call recordings, if retained
- b.** Call logs
- c.** Representative notes
- d.** Chat transcripts
- e.** Emails
- f.** Online submissions

- g.** Account notes
- h.** Escalation records
- i.** Supervisor notes
- j.** Complaint or dispute records

For any recording no longer retained, identify its date and the applicable retention period.

REQUEST NO. 16 - "BLANK ONLINE REQUESTS"

KU states in Paragraph 9 of its Answer that several contacts were "blank online requests" in which account information was submitted without an explanation of the inquiry. For each such request:

- a.** Provide the date and time
- b.** Provide the complete electronic record
- c.** Identify the fields submitted
- d.** State whether KU's system recorded an error or submission failure
- e.** Provide any metadata showing whether text was entered but failed to transmit or display
- f.** State what action, if any, KU took after receiving the request

REQUEST NO. 17 - DISCONNECTION OF MAY 19, 2026

Provide all records concerning the May 19, 2026 disconnection, including:

- a.** The account balance KU contends was due
- b.** Disconnection notices
- c.** Mailing records
- d.** Electronic notices
- e.** Account notes
- f.** Dispute status
- g.** Payment arrangements
- h.** Remote-disconnection commands and system logs
- i.** Date and exact time service was disconnected
- j.** The tariff and regulatory provisions KU relied upon in authorizing the disconnection

REQUEST NO. 18 - RECONNECTION AND \$350 PAYMENT

KU states that Melissa Saurini paid \$350 on May 19, 2026 and that service was restored pursuant to an agreement reached during a prior telephone call that day. Provide:

- a.** The recording of that telephone call, if retained
- b.** Complete representative notes regarding the agreement
- c.** The terms of the agreement
- d.** The calculation of the \$350 amount
- e.** The exact time the payment was received

- f. The exact time the reconnect command was initiated
- g. The exact time electrical service was restored
- h. Any fees charged in connection with the disconnection or reconnection

REQUEST NO. 19 - DISPUTED-ACCOUNT PROCEDURES

Identify the KU tariff provisions, written procedures, policies, training materials, or instructions applicable during May 2026 concerning disconnection of residential service where a customer has questioned or disputed the accuracy of charges or account balances.

REQUEST NO. 20 - ACCOUNT ADJUSTMENTS AND AUDIT TRAIL

Provide a transaction-level account audit trail from September 1, 2025 through the present showing all:

- a. Charges
- b. Payments
- c. Credits
- d. Debits
- e. Reversals
- f. Corrected bills
- g. Adjustments
- h. Deposit transactions
- i. Installment-plan transactions
- j. Manual changes made by KU employees

For each manual adjustment, identify the date, amount, reason, and employee or department authorizing it.

REQUEST NO. 21 - CUSTOMER-SIDE ELECTRICAL PANEL

KU's Answer characterizes the electrical-box damage shown in the July 8 supplemental filing as being on the customer's side of the meter. Please state:

- a. Whether KU personnel inspected the damaged or arc-marked equipment
- b. Whether KU personnel observed the condition depicted in the photograph
- c. Whether KU performed voltage, service, meter, connection, or power-quality testing in response
- d. Whether KU determined whether any KU-owned equipment or service condition could have contributed to flickering or voltage irregularities experienced at the premises
- e. Produce all records supporting KU's conclusions

REQUEST NO. 22 - RECORDS RELIED UPON FOR KU'S ANSWER

For each factual assertion contained in KU's July 30, 2026 Answer, identify and produce the documents, electronic data, account records, work orders, correspondence, testing results, policies, tariffs, or other information upon which KU relied in making that assertion, except to the extent the information has already been produced in response to another numbered request.

REQUEST NO. 23 - PERSONS WITH KNOWLEDGE

Identify by name and job title each KU employee, contractor, or representative known to KU who has material knowledge concerning:

- a. The October 2025 meter-data configuration error
- b. Billing corrections
- c. RTOD configuration
- d. Winter consumption
- e. Customer communications
- f. The May 19 disconnection and reconnection
- g. Meter accuracy or testing
- h. The post-complaint site inspection
- i. Verification that Meter No. [REDACTED] serves only the Complainants' residence

For each person, briefly identify the subject matter of that person's knowledge.

REQUEST NO. 24 - PRESERVATION OR LOSS OF RELEVANT RECORDS

Identify any responsive records, recordings, logs, interval data, work orders, communications, system data, or other information that existed but has been deleted, overwritten, destroyed, or is no longer available. For each, identify:

- a. The type of record
- b. Approximate date
- c. When it ceased to be available
- d. The reason
- e. The applicable retention policy
- f. Whether the information can be reconstructed from another source

CONCLUSION

These requests seek information directly relevant to the factual issues presented in the Amended Formal Complaint and KU's defenses and factual assertions in its July 30, 2026 Answer.

Complainants respectfully request that KU provide complete and precise responses within the deadline established by the Commission's September 10, 2026 Order.

Respectfully submitted,

/s/ **Melissa Saurini**
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/s/ **Jonathan Jones**
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CERTIFICATE OF SERVICE

I hereby certify that on September 10, 2026, a true and correct copy of the foregoing Complainants' First Request for Information to Kentucky Utilities Company was filed with the Kentucky Public Service Commission and served upon counsel for Kentucky Utilities Company in accordance with applicable Commission rules and orders.

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