

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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COMMISSION

In the Matter of:

MELISSA SAURINI AND JONATHAN JONES,

Complainants,

v.

KENTUCKY UTILITIES COMPANY,

Defendant.

Case No. 2026-00154

**COMPLAINANT MELISSA SAURINI'S RESPONSE IN OPPOSITION TO MOTION
FOR INFORMAL CONFERENCE AND REQUEST TO PRESERVE WRITTEN
DISCOVERY**

Complainant Melissa Saurini, appearing pro se and signing on her own behalf, respectfully opposes Kentucky Utilities Company's ("KU") October 14, 2026 Motion for Informal Conference pursuant to 807 KAR 5:001, Sections 5(2) and 9(4). In support, Complainant Saurini states as follows:

1. KU's motion and the present posture of this case.

KU asks the Commission to convene an informal conference for discussion of the complaint and possible settlement before any formal hearing. Complainant Saurini does not oppose reasonable case management. She objects, however, to conducting settlement discussions before KU provides the underlying information necessary for Complainant Saurini to evaluate the disputed bills, meter data, and service practices.

2. Unresolved customer inquiries predate formal discovery.

Complainant Saurini and co-complainant Jonathan Jones have repeatedly sought meaningful written explanations and supporting records from KU concerning disputed charges, consumption, account adjustments, and service-related issues. KU's July 30, 2026 Answer, paragraph 9, acknowledges multiple customer contacts between September 2025 and May 2026 regarding Residential Time-of-Day (RTOD) service, the corrected October 2025 bill, a security-deposit installment plan, and disconnection issues. Complainant Saurini maintains that these earlier inquiries have not been adequately resolved by documentary responses. Although KU filed an Answer to the complaint, that filing does not establish that all requested underlying records have been supplied.

3. KU acknowledges a material billing-system error.

In paragraph 8 of its July 30 Answer, KU states that the first October 2025 bill issued under RTOD showed zero usage because of an error in the setup of meter data at the time of the rate change. KU states that it subsequently corrected the billing system and issued a corrected bill based on meter-recorded usage. This is KU's account of what occurred; Complainant Saurini seeks the original and corrected data, the audit trail, the dates and causes of the error, and calculations demonstrating the accuracy and effect of the correction. She does not ask the Commission to presume that every disputed charge is incorrect merely because this error occurred.

4. Formal requests for information are pending.

On September 10, 2026, the Complainants filed their First Request for Information to KU containing 24 numbered requests. Those requests seek, among other things, interval-usage and meter-event data (Requests 1-2); the October 2025 error investigation, corrections, and underlying usage (Requests 3-4); billing reconciliations and RTOD configuration (Requests 5-7); meter-testing and service-attribution records (Requests 8-12); records of flickering and customer communications (Requests 14-16); disconnection and reconnection information (Requests 17-19); transaction-level adjustments (Request 20); records supporting KU's Answer (Request 22); and information on lost or unavailable records (Request 24).

The Commission's September 10, 2026 Order establishes October 16, 2026, as the deadline for responses to initial information requests. As of this response, Complainant Saurini is still seeking the requested underlying information. Complainant Saurini acknowledges that, as of October 15, 2026, the formal response deadline has not yet passed and does not claim that KU is already in default of that deadline.

5. Complete, properly supported discovery responses are necessary.

Under 807 KAR 5:001, Section 4(12)(d), KU must respond in the manner required by the regulation, including identifying the responsible witness and providing the required oath or corporate certification. If KU does not furnish all or part of requested information, it must state in writing the specific grounds for failing to respond completely and precisely. If any response is incomplete or improperly withheld after the deadline, Complainant Saurini reserves the right to seek relief under Section 4(12)(e), including a motion describing the requested information, its relevance, and efforts to resolve the disagreement. She is not asking the Commission to decide an as-yet-unidentified discovery dispute prematurely.

6. An informal settlement conference is premature.

Complainant Saurini is self-represented and is concerned that a live settlement discussion with KU's representatives and counsel, without the requested records, could create pressure to negotiate before she can reasonably assess her claims. She prefers written, on-the-record explanations and production of supporting documents. Complainant Saurini does not consent to dismissal or settlement, does not waive any disputed factual issue, and does not ask to suspend the established discovery schedule.

7. Alternative protections if the Commission convenes a conference.

If the Commission determines that a conference would be useful, Complainant Saurini respectfully requests that it be deferred until after KU serves its discovery responses and she has a reasonable opportunity to review them; that she be allowed to participate remotely, rather than being required to travel; that a written agenda and any written settlement proposal be supplied in advance; that she may present written questions; and that any resulting proposal remain subject to her voluntary, informed written acceptance. Complainant Saurini understands that the Commission retains discretion under 807 KAR 5:001, Section 9(4), to convene a conference.

8. A formal hearing remains available if necessary.

Complainant Saurini remains willing to participate in a formal evidentiary hearing if material factual disputes cannot be resolved on the written record. Opposing this informal conference is not a refusal to participate in the Commission's proceedings or a waiver of hearing rights. She recognizes that the September 10 Order separately requires any request for a hearing, supported by a detailed statement of factual issues, to be filed no later than October 23, 2026.

WHEREFORE, Complainant Melissa Saurini respectfully requests that the Commission:

A. Deny KU's Motion for Informal Conference without prejudice, or defer consideration until after Complainant Saurini receives and has a reasonable opportunity to review KU's responses to the September 10 information requests;

B. Maintain the existing October 16 discovery-response deadline unless changed by a subsequent Commission order;

C. Expect KU to provide responses in accordance with 807 KAR 5:001, Section 4(12), including specific written grounds for any information withheld;

D. Preserve Complainant Saurini's ability to challenge deficient responses by an appropriate motion after the responses are due and the parties have attempted to resolve any disagreement;

E. Alternatively, if a conference is ordered, adopt the reasonable written-process and remote-participation protections requested in paragraph 7;

F. Clarify that the requested informal conference does not itself stay applicable deadlines, compel settlement, or waive Complainant Saurini's ability to make a timely separate request for hearing; and

G. Grant such other relief as the Commission deems appropriate.

Respectfully submitted,

/s/ Melissa Saurini

Melissa Saurini, Pro Se

241 Braxton Lane

Lily, KY 40740

Email: [REDACTED]

Date signed: October 15, 2026

CERTIFICATE OF SERVICE

I certify that on October 16, 2026, a true and correct copy of this response was served on the following counsel for Kentucky Utilities Company by email:

Sara V. Judd, PPL Services Corporation, 2701 Eastpoint Parkway, Louisville, KY 40223; svjudd@pplweb.com. Christopher C. Tieke, PPL Services Corporation, 2701 Eastpoint Parkway, Louisville, KY 40223; cctieke@pplweb.com.

Method of service: ☒ Email to both counsel ☐ U.S. Mail ☐ Other

/s/ Melissa Saurini

Signature of person who completed service