

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

Case No. 2026-00190

CHERYL ROLAND, Complainant

v.

OWEN ELECTRIC COOPERATIVE, INC., Defendant

COMPLAINANT'S NOTICE OF SUPPLEMENTAL EVIDENCE

Comes now the Complainant, Cheryl Roland, acting *pro se*, and respectfully submits this **Notice of Supplemental Evidence** exposing critical facts regarding the exact nature of the service Owen Electric Cooperative, Inc. provided to the Applicant on June 2, 2026, which demonstrates a severe regulatory and code violation. This filing provides **specific physical observations, a clear chronological timeline and photographic evidence** demonstrating that Defendant, Owen Electric Cooperative, Inc., **energized an unpermitted residential site**, in violation of **807 KAR 5:006, their own filed tariffs, and failure to provide adequate, efficient and reasonable service under KRS 278.030(2)** and that a **retroactive attempt to cover up this violation** has occurred on-site since this case was initiated.

I. Chronology of Infrastructure and Residential Usage

1. **The 6-Year Status Quo:** For approximately six (6) years, a camper has sat on the Applicant's adjacent lot with no permanent utility connections, no running water, and no lawful waste system. The owners historically have used a portable generator to power the camper and have only occupied the land on selective weekends but with greater frequency of late.

2. **The Electrical Stand/Pedestal Construction:** In August 2025, the Applicant neighbor began erecting the electrical pedestal setup. In addition to the Applicant himself, Complainant witnessed at least two (2) separate individuals working on the electrical setup on at least two (2) distinct occasions.
3. **The June 2 Catalyst:** On June 2, 2026, Owen Electric rushed power to this lot—obstructing Complainant’s 40-foot travel corridor to do so—fully aware that the property lacks a primary residential home nor any evidence of one in progress and has no running water.
4. **The July 3 – July 5 Occupancy:** Complainant observed that the Applicant neighbor and two additional individuals occupied the camper as a residence for 3 days and at least 2 nights over the scorching hot July 4th holiday weekend. Complainant observed continuous operational "fan-type" noises coming from the direction of the camper, but zero historical generator noise, proving the camper was actively drawing electricity from the pedestal to power climate control or ventilation.

II. Discovery of Physical Wastewater Infrastructure and Cover-Up

Four days after this PSC case went live on 7/10/26, Complainant observed, on Tuesday, July 14, 2026, what appeared to be a one-day, rushed installation of a wastewater/septic system on-site. Complainant has discovered clear physical evidence of this unpermitted wastewater/septic installation. Specifically, an industry-standard blue-green gravity sewer pipe has been left exposed, sticking vertically out of freshly excavated dirt. After it appeared they had placed everything in the ground—a tank, what appeared to be only one lateral drain, a trench part of the way to the camper, and a raw patch of dirt and mound of dirt seeming to connect everything—a Bobcat or similar equipment immediately commenced covering the dig site. Complainant did not observe the use of any gravel at the site nor a water source to fill the buried tank.

III. Regulatory Significance

1. **Color-Coded Evidence:** In wastewater construction, green/blue-green PVC piping is strictly color-coded for sewer lines and septic cleanouts. This pipe proves that a wastewater system was rushed into the ground immediately after this case became active.
2. **Violation of Service Standards:** Under **807 KAR 5:006** and **Owen Electric's filed tariffs**, a utility is legally prohibited from connecting power to a residential site or structure without verifying that valid local electrical and health department clearances are already in place. The timeline proves Owen Electric energized this site without these mandatory clearances and has violated their duty to provide adequate, efficient and reasonable service under **KRS 278.030(2)**.
3. **Absence of Running Water:** The site completely lacks any source of pressurized running water. When Corinth Water District extended lines last year, the Applicant not only refused service but prevented the District from boring under a small section of the travel corridor to bring both the Complainant's and the Applicant's lines in one trench back the corridor. Energizing a residential habitation hookup under these conditions constitutes a major utility safety failure and an immediate public health hazard.

IV. Request for Commission Review

Complainant respectfully requests that the Commission review this timeline and supplemental evidence, accept the attached photographs of the newly exposed sewer pipe and dig site into the active case record, and compel Owen Electric to produce the formal, dated written inspection certificates, health releases, and **exact billing/service address details** they used to authorize this June 2 installation.

V. Request for Relief

Wherefore, Complainant also requests that the Commission:

1. Order Owen Electric to immediately remove the two poles and three guy wires from the restricted 40-foot ingress/egress corridor;
2. Order Owen Electric to restore the land to its original condition;
3. Find that Owen Electric violated 807 KAR 5:006, their own filed tariffs, KRS 278.030(2), enabled local code/health department violations and contributed to an imminent threat or danger to health;
4. Levy civil penalties against the utility for willful violations pursuant to **KRS 278.990**; and
5. Grant any other relief to which the Complainant may be entitled.

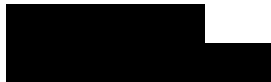
Dated: August 11, 2026

Respectfully submitted,

/s/ Cheryl D. Roland

Cheryl D. Roland, Pro se Complainant

5785 Lawrenceville Rd
Williamstown, KY 41097



CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing Complainant's Notice of Supplemental Evidence and accompanying Exhibit A was emailed to the Kentucky Public Service Commission at PSCED@ky.gov and served via electronic mail and first-class U.S. Mail, postage prepaid, on this 11th day of August, 2026, upon the following:

Hon. Jake A. Thompson
Hon. James M. Crawford
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Respectfully submitted,

/s/ Cheryl D. Roland

Cheryl D. Roland, *Pro se* Complainant

Date: August 11, 2026

ATTACHED EXHIBIT:

Exhibit A: PHYSICAL EVIDENCE--Photographic Evidence of Wastewater/Septic installation on Applicant's property of July 14, 2026 and August 4, 2026

EXHIBIT A

PHYSICAL EVIDENCE

**Photographic Evidence of Wastewater/Septic installation
on Applicant's property of July 14, 2026 and August 4, 2026**



Photo taken July 14, 2026

Exhibit A: Physical Evidence (cont'd)

Photos taken July 14, 2026



Exhibit A: Physical Evidence (cont'd)



Photos taken July 14, 2026

Exhibit A: Physical Evidence (cont'd)



Photo taken August 4, 2026

Exhibit A: Physical Evidence (cont'd)



Photo taken August 4, 2026

Exhibit A: Physical Evidence (cont'd)

Photo taken August 4, 2026

