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PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

CASE NO. 2026-00304

LEMAR COLLIER

COMPLAINANT

v.

LOUISVILLE GAS AND ELECTRIC COMPANY

DEFENDANT

COMPLAINANT'S FORMAL MOTION FOR PRODUCTION OF
NATIVE RECORDS AND ACCOUNT AUDIT LOGS PURSUANT TO
807 KAR 5:001

Comes now the Complainant, Lemar-Nathaniel Collier, acting *Sui Juris* as the Authorized Representative for the Private Estate, and respectfully moves this Commission to issue an Order compelling the Defendant, Louisville Gas and Electric Company (LG&E), to produce and surrender complete, unedited native electronic records, screen notes, internal audit logs, and audio call recordings relative to the infrastructure account serving 2605 Thomas Ave, Louisville, KY 40216.

In support of this Motion, Complainant states as follows:

1. **Procedural Foundation:** On October 12, 2026, at 4:06 PM EDT, LG&E Corporate Ombudsman Jerry Martin placed a critical written admission on the record via electronic mail, confirming that a valid life-safety crisis voucher in the amount of \$399.17 was fully executed and applied to the subject account on September 21, 2026, at 11:07 AM, and was subsequently cancelled at 4:28 PM that same afternoon following an external administrative command.
2. **Material Relevance:** The specific data strings, employee identification numbers, internal system remarks, and digital audio logs recorded by LG&E customer care representatives during the hours of 11:07 AM and 4:28 PM on September 21, 2026, and at 9:04 AM on September 24, 2026, contain un-rebuttable material evidence regarding an unauthorized deprivation of protected utility interests during an active, documented medical crisis.
3. **The Necessity of Native Discovery:** Complete administrative adjudication of this matter cannot occur using summary email statements. The native computer screen notes (Oracle Utilities CC&B/C2M platform entries) and unedited audio recordings are vital to verify the identities, statutory capacities, and explicit declarations of the municipal actors who interceded to cancel the life-safety funding.

WHEREFORE, Complainant respectfully requests that this Commission enter an Order directing Defendant LG&E to produce the following items within fourteen (14) days:

- Complete, unredacted internal customer care screen notes and system audit logs from September 21, 2026, through September 25, 2026.

- The native digital audio recordings of all inbound and outbound telephone calls between LG&E agents and representatives of the Louisville Metro Office of Social Services regarding the account of Lemar Collier during the subject time period.

Dated: October 12, 2026

Respectfully submitted,

By: [Lemar-Nathaniel: Collier](#)

Lemar-Nathaniel: Collier, Chief Trustee, Suis Juris

Authorized Representative for THE BLUE TOPAZ PRIVATE HOLDING TRUST

2605 Thomas Ave, Louisville, KY 40216

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