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PUBLIC SERVICE COMMISSION

From: Lemar Collier
To: PSC Executive Director
Cc: statereg@lge-ku.com; Commonwealth Office of Ombudsman
Subject: LEGAL FILING: Complainant"s Formal Motion to Compel Discovery - CASE NO. 2026-000304
Date: Saturday, October 31, 2026 2:35:36 PM
Attachments: Complainants_Motion_to_Compel_Discovery_PSC_FILED.pdf.pdf

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ATTENTION: FILINGS BRANCH / EXECUTIVE DIRECTOR REGISTRY

Please accept for formal docketing and entry onto the active public record the attached formal pleading in the matter of **LEMAR NATHANIEL COLLIER VS. LOUISVILLE GAS AND ELECTRIC COMPANY, CASE NO. 2026-000304**.

Enclosed is the **Complainant's Formal Motion to Compel Production of Records and Discovery Response**, executed this 31st day of October, 2026, under full reservation of all unalienable rights.

As detailed in the attached instrument, Defendant LG&E's strict 14-day statutory window to file verified responses or raise lawful objections to Complainant's initial *Motion for Production of Records* expired precisely at **5:00 PM Eastern Time on Tuesday, October 27, 2026**, under 807 KAR 5:001 Section 5.

Because a comprehensive audit of the electronic case management system confirms that Defendant LG&E has completely failed to execute any filing or request an extension of time, the Complainant respectfully moves the Commission for an expedited Order compelling immediate production of all unedited Oracle Utilities customer screen notes, telephony tracking metadata, and audio interaction logs.

Take notice that this open discovery dispute acts as an active **Disconnection Bar**, legally prohibiting any remote or physical smart-meter infrastructure lockout at 2605 Thomas Ave pending a final determination by this Commission.

Thank you for your administrative diligence in maintaining the integrity of this regulatory court file.

Sincerely,
Lemar-Nathaniel: Collier, Chief Trustee, *Sui Juris*
Authorized Representative for THE BLUE TOPAZ PRIVATE HOLDING TRUST

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

CASE NO. 2026-000304

In the Matter of:

LEMAR NATHANIEL COLLIER (THE BLUE TOPAZ TRUST) – COMPLAINANT

VS.

LOUISVILLE GAS AND ELECTRIC COMPANY – DEFENDANT

COMPLAINANT'S FORMAL MOTION TO COMPEL PRODUCTION OF RECORDS AND DISCOVERY RESPONSE

Complainant Lemar-Nathaniel: Collier, appearing *Sui Juris* as Chief Trustee and Authorized Representative for the Private Estate Trust **THE BLUE TOPAZ PRIVATE HOLDING TRUST** (backed by Kentucky Secretary of State UCC-1 File No. 2026-341729-37 & Amendment .02), respectfully moves this Commission pursuant to **807 KAR 5:001 Section 5** and **Section 8** for a formal Order compelling Defendant LOUISVILLE GAS AND ELECTRIC COMPANY (LG&E) to immediately produce complete, unedited, and unredacted responses to Complainant's *Motion for Production of Records*, initially logged onto the state repositories on **October 13, 2026**.

In support of this Motion, Complainant states as follows:

I. RELEVANT PROCEDURAL HISTORY

1. On October 12, 2026, this Commission officially acknowledged and docketed the Complainant's formal Life-Safety and Medical Hardship Complaint under **Case No. 2026-000304**.
2. On October 13, 2026, Complainant formally filed and served a comprehensive *Motion for Production of Records* via the master repository (PSCED@ky.gov), demanding all unedited internal Oracle Utilities customer screen notes, telephony tracking metadata, and audio interaction logs concerning account transactions dating from June 1, 2026, through the present date.
3. Pursuant to **807 KAR 5:00Section 5**, a party served with a discovery demand or informational order has exactly fourteen (14) calendar days to file verified answers, raise lawful statutory objections, or move for a protective order.
4. The statutory cutoff for Defendant LG&E to file an Answer to the discovery request expired precisely at **5:00 PM Eastern Time on Tuesday, October 27, 2026**.
5. A comprehensive audit of the master electronic repository confirms that Defendant LG&E has completely failed to execute a filing, failed to request an

extension of time, and failed to transmit a verified response, placing the regulated utility provider in total, un-rebutted administrative discovery default.

II. ARGUMENT & MANDATORY MATERIAL FIELDS

Defendant LG&E's absolute silence and discovery default constitute a bad-faith effort to conceal critical physical evidence concerning active database manipulation, unauthorized voucher deletions, and a systemic violation of Title II of the Americans with Disabilities Act (ADA).

The unredacted records are vital to resolve this controversy and are known to reside within Defendant's proprietary database infrastructures. The Commission must compel immediate production of the following evidence fields:

- **FIELD 1 (Oracle Database Screens):** The native, chronological *Customer Interaction Notes* and screen-log registers showing the exact server commands executed on **September 21, 2026, at 4:28 PM**, where front-line social service operators called the utility desks to manually reverse and cancel a verified **$399.17 emergency crisis voucher**.
- files (`.wav` or `.mp4` format) of all customer service and ombudsman communications concerning the Complainant's account, explicitly including the corporate communications received from Louisville Metro Social Services staff on September 21, 2026, and September 24, 2026.
- **FIELD 3 (The Ombudsman's Admissions):** Complete copies of the internal data streams underlying Corporate Ombudsman Jerry Martin's written communication dated October 12, 2026, which formally confirmed the execution of manual voucher deletion loops.

III. RELIEF DEMANDED

WHEREFORE, Complainant respectfully requests that this Commission enter an Order:

1. **GRANTING** Complainant's Motion to Compel in its entirety;
2. **COMMANDING** Defendant LOUISVILLE GAS AND ELECTRIC COMPANY to produce and deliver all requested unedited database files directly to [redacted] within three (3) business days; and
3. **MAINTAINING** an absolute **Disconnection Bar** prohibiting any physical, remote, or smart-meter infrastructure disruption at **2605 Thomas Ave, Louisville, KY 40216**, pending the full resolution of this discovery dispute.

Dated: October 31, 2026

Respectfully submitted,

By: Lemar-Nathaniel: Collier_____

Lemar-Nathaniel: Collier, Chief Trustee, *Sui Juris*

Authorized Representative for THE BLUE TOPAZ PRIVATE HOLDING TRUST

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing formal pleading was electronically transmitted this 31st day of October, 2026, to the Public Service Commission Filings Branch (PSCED@ky.gov) and concurrently served onto Defendant LG&E's legal compliance division at statereg@lge-ku.com.

By: _Lemar-Nathaniel: Collier_____

Lemar-Nathaniel: Collier, Chief Trustee, *Sui Juris*