**BEFORE**

**THE PUBLIC UTILITIES COMMISSION OF OHIO**

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| --- | --- | --- |
| In the Matter of the Complaint  of Nancy E. Russell  Complainant,  v.  Columbia Gas of Ohio, Inc.  Respondent. | )  )  )  )  )  )  )  )  ) | Case No. 11-5876-GA-CSS |

**ANSWER**

**OF COLUMBIA GAS OF OHIO, INC.**

Now comes the Respondent, Columbia Gas of Ohio, Inc. (“Columbia”), and files its Answer to the Complaint filed herein on December 7, 2011.

1. Columbia denies that it performed “inferior and wrong” service as alleged in Count 1 of the Complaint.
2. Columbia denies the remaining allegations contained in the Complaint.

**Affirmative Defenses**

1. Columbia avers that the Complainant has failed to state reasonable grounds for a complaint against Columbia as required by Ohio Revised Code § 4905.26.
2. The Public Utilities Commission of Ohio (“Commission”) lacks jurisdiction over this matter.
3. Complainant is not the proper party to this action.
4. Complainant is solely seeking monetary damages in this proceeding, which the Commission is unable to grant.
5. Columbia avers that it has complied with all applicable Ohio statutes, the Commission’s rules and regulations and Columbia’s tariff.

Respectfully Submitted by,

**COLUMBIA GAS OF OHIO, INC.**

\_\_\_/s/ Brooke E. Leslie

Brooke E. Leslie, Trial Attorney

Stephen B. Seiple, Assistant General Counsel

Brooke E. Leslie, Counsel

200 Civic Center Drive

Columbus, OH 43216-0017

Telephone: (614) 460-5558

Email: bleslie@nisource.com

**CERTIFICATE OF SERVICE**

I hearby certify that I have served a copy of the foregoing *Answer of Columbia Gas of Ohio, Inc.,* by ordinary U.S. mail, postage prepaid, to Nancy E. Russell, 310 Waterside Dr., Deleware, Ohio 43015 this 28th day of December, 2011.

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Brooke E. Leslie

**Attorney for**

**COLUMBIA GAS OF OHIO, INC.**