

FILE

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

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2006 DEC 21 PM 4:07
PUCO

Edward Teiga,

"Complainant,"

v.

AEP Ohio,

"Respondent."

Case No. 06-1429-EL-CSS

COLUMBUS SOUTHERN POWER COMPANY'S
ANSWER TO COMPLAINT AND MOTION TO DISMISS

Although the Commission's complaint form was filled in to show "AEP Ohio" as the utility serving the Complainant, Columbus Southern Power Company (the Company) is the electric service provider to the Complainant and will respond to the complaint.

Although the complaint did not list numbered allegations, the Company submits the following as its answer:

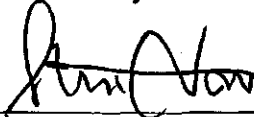
- 1) The Company admits that storms and high winds can cause temporary service outages beyond the Company's control. But the Company denies the allegation that the "breaker should be larger or a auto reset function should be installed." Brief outages or intermittent "blinks" are normal operations of distribution system equipment. The system is designed to give faults a chance to clear themselves on the line before locking out the breaker (causing a full outage). When the lights blink, that often means the fault that was on the line (tree branch, animal, etc.) has cleared itself and the system has returned to normal. In the event the fault does not clear itself, the customer will see the circuit operate twice in an attempt to clear the fault before locking out.
- 2) As to the allegation that an outage occurred "on December 1, 2007," the Company admits that high winds caused damage to a pole and transformer feeding the complainant's residence on December 1, 2006 (the Company presumes that was the date intended to be referenced).

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- 3) The Company is without sufficient knowledge or information to form a belief as to the truth of the allegation that the "sump pump does not work and floods the basement" but denies any claim that the Company is financially responsible for any such occurrence.
- 4) The Company notes that it has no record of Mr. Teiga registering any informal complaints with the Company or discussing his claims with the Company prior to filing this complaint.
- 5) The Company submits that it has taken adequate and appropriate actions to address outages on the circuit serving complainant, including the following: (a) the circuit had several inspections in 2005 including a visual inspection and an infrared inspection, (b) the circuit was reviewed for equipment coordination in 2005 and new sectionalizing devices were installed on the lines to aid in decreasing the number of customers affected by outages, (c) crews are currently in the process of re-conductoring the main line including setting new poles and upgrading the conductor, (d) in further response to this complaint, the Company plans to visually re-inspect the circuit and ensure any tree trimming presently needed is completed.

The Company asserts that Mr. Teiga has failed to set forth any reasonable grounds for complaint. Further, the complaint lacks sufficient specificity that would support a finding against the Company. Therefore, the Company urges the Commission to dismiss the complaint with prejudice. Moreover, the issue complained of, reliability on the circuit is already being addressed and prudently managed by the Company and there is no further relief to be granted. Therefore, the Company asserts that this complaint should be dismissed.

Respectfully submitted,

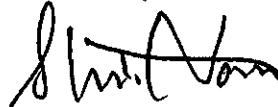


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Counsel for Columbus Southern Power Company

CERTIFICATE OF SERVICE

I hereby certify that a copy of the Columbus Southern Power Company's Answer and Motion to Dismiss was served upon the Complainant at the address shown below, via first class U.S. Mail, postage prepaid this 21st day of December 2006.



Steven T. Nourse
Counsel for Columbus Southern Power Company

Edward Teiga
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