

BEFORE THE PUBLIC UTILITES COMMMISSION OF OHIO

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In the Matter of the Complaint of Medina Smokehouse Medina Foods Complainant, v.

Case No. 11-3148-GA-CSS

Columbia Gas of Ohio, Inc. Respondent.

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 May 20, 2011.

- 1. Columbia admits that one of its technicians discovered and uncovered exposed house line serving Complainant.
- 2. Columbia admits that it terminated gas service due to unsafe working conditions.
- 3. Columbia generally denies all of the remaining allegations contained in the Complaint.

Affirmative Defenses

- 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, Columbia's tariff and all other written agreements between Columbia and Complainant or its representatives.
- 6. The Public Utilities Commission of Ohio ("Commission") lacks jurisdiction over this matter.

 7. Columbia avers that the Complainant has failed to state reasonable grounds for a complaint against Columbia as required by Ohio Revised Code § 4905.26.

Respectfully Submitted by,

COLUMBIA GAS OF OHIO, INC.

Brook E. Leslie 1845,

Brooke E. Leslie, Trial Attorney

Stephen B. Seiple, Asst. 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 hereby certify that I have served a copy of the foregoing Answer of Respondent Columbia Gas of Ohio, Inc., by ordinary U.S. mail, postage prepaid, to Medina Smokehouse Medina Foods, 9706 Crow Road, Litchfield, OH 44253 on this 9th day of June, 2011.

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Brooke E. Leslie Attorney for COLUMBIA GAS OF OHIO, INC.