

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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

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

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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**

3. Columbia avers that the Complainant has failed to state reasonable grounds for a complaint against Columbia as required by Ohio Revised Code § 4905.26.
4. The Public Utilities Commission of Ohio ("Commission") lacks jurisdiction over this matter.
5. Complainant is not the proper party to this action.
6. Complainant is solely seeking monetary damages in this proceeding, which the Commission is unable to grant.

7. 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

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**CERTIFICATE OF SERVICE**

I hereby 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 Drive, Delaware, Ohio 43015 this 28<sup>th</sup> day of December, 2011.

/s/ Brooke E. Leslie

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

**This foregoing document was electronically filed with the Public Utilities**

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**in**

**Case No(s). 11-5876-GA-CSS**

Summary: Answer Answer of Columbia Gas of Ohio, Inc. electronically filed by B. Scott on behalf of Columbia Gas of Ohio