

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

ANGELA BA	)	
	)	
Complainant,	)	
	)	Case No. 12-2161-GA-CSS
v.	)	
	)	
VECTREN ENERGY DELIVERY OF	)	
OHIO, INC.	)	
	)	
Respondent.	)	

**ANSWER**

Pursuant to Ohio Adm. Code 4901-9-01(D), the Respondent, Vectren Energy Delivery of Ohio, Inc. (“VEDO” or the “Company”), for its answer to the complaint of Angela Ba states:

**FIRST DEFENSE**

1. VEDO is without sufficient knowledge or information to admit or deny the allegations in the declaration of domicile attached to the complaint as page 2.
2. VEDO is without sufficient knowledge or information to admit or deny that Ms. Ba “recently called Vectren to get service started.”
3. VEDO denies that it informed Ms. Ba of a \$344.20 arrearage. VEDO further avers that the final balance on the account in question was \$375.02.
4. VEDO is without sufficient knowledge or information to admit or deny that the outstanding arrearage is not owed by Ms. Ba.
5. VEDO is without sufficient knowledge or information to admit or deny the allegations concerning whether Ms. Ba lives at the address.
6. VEDO is without sufficient knowledge or information to admit or deny that Ms. Ba never authorized service and was uninformed of the arrearage. VEDO admits it sent bills to

the service address. VEDO is without sufficient knowledge or information to admit or deny the allegation that Ms. Ba does not reside at the service address.

7. VEDO admits that it established service in the name of Angela Ba, continued service for nine months, and disconnected service when it was unpaid.

8. VEDO is without sufficient knowledge or information to admit or deny that the service was without Ms. Ba's authorization.

9. VEDO denies generally any allegations not specifically admitted or denied in this Answer, pursuant to Ohio Adm. Code 4901-9-01(D).

### **AFFIRMATIVE DEFENSES**

#### **SECOND DEFENSE**

10. The complaint does not comply with the Commission's rules requiring "a statement which clearly explains the facts." Ohio Adm. Code 4901-9-01(B). The complaint is not in paragraph form, but in narrative form, and many of the allegations in the complaint are unclearly stated or compound. VEDO has attempted, to the best of its ability, to answer all of the allegations, but reserves the right to amend its answers in the event it has incorrectly understood them.

#### **THIRD DEFENSE**

11. The complaint does not contain "a statement of relief sought," as required by Ohio Adm. Code 4901-9-01(B) since Ms. Ba cannot request monetary damages to be awarded in this proceeding.

#### **FOURTH DEFENSE**

12. The complaint fails to set forth reasonable grounds for a complaint, as required by R.C. 4905.26.

**FIFTH DEFENSE**

13. The complaint fails to state a claim upon which relief can be granted.

**SIXTH DEFENSE**

14. VEDO at all times complied with Ohio Revised Code Title 49; the applicable rules, regulations, and orders of the Public Utilities Commission of Ohio; and VEDO's tariffs. These statutes, rules, regulations, orders, and tariff provisions bar Ms. Ba's claims.

**SEVENTH DEFENSE**

15. VEDO reserves the right to raise other defenses as warranted by discovery in this matter.

WHEREFORE, VEDO respectfully requests an Order dismissing the complaint and granting VEDO all other necessary and proper relief.

Respectfully submitted,

/s/ Andrew J. Campbell  
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ATTORNEYS FOR VECTREN ENERGY  
DELIVERY OF OHIO, INC.

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Answer was served by U.S. mail, postage prepaid, to the following person on this 14th day of August, 2012:

Angela Ba  
115 E. Smith Street, #10  
Orlando, FL 32804

/s/ Andrew J. Campbell  
One of the Attorneys for Vectren Energy  
Delivery of Ohio, Inc.

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Summary: Answer of Vectren Energy Delivery of Ohio, Inc. electronically filed by Ms. Melissa L. Thompson on behalf of Vectren Energy Delivery of Ohio, Inc.