

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

HARRIET SHASBY)	
)	
Complainant,)	
)	
v.)	Case No. 12-2262-EL-CSS
)	
OHIO EDISON COMPANY,)	
)	
Respondent.)	
)	

ANSWER OF OHIO EDISON COMPANY

Ohio Edison Company (collectively “Ohio Edison”), by counsel, for its Answer to the Complaint states as follows:

1. Ohio Edison is a public utility, as defined by §4905.03(A)(4), O.R.C. and is duly organized and existing under the laws of the State of Ohio.
2. While the Complaint consists of one unnumbered page, Ohio will attempt to specifically answer the different allegations within the Complaint.
3. For its Answer to the first unnumbered paragraph, Ohio Edison admits that Complainant has an account with Ohio Edison. Ohio Edison denies for lack of knowledge the remaining allegations contained in the first unnumbered paragraph.
4. For its Answer to the second unnumbered paragraph, Ohio Edison admits that it billed Complainant for 1,302 kWh for usage from October 11, 2011 to November 8, 2011; 2,052 kWh for usage from December 9, 2011 to January 10, 2012; and 2,756 kWh for usage from February 10, 2012 to March 9, 2012. Ohio Edison denies the remaining allegations contained in the second unnumbered paragraph.

5. For its Answer to the third unnumbered paragraph, Ohio Edison admits that Complainant contacted it. Ohio Edison denies the remaining allegations contained in the third unnumbered paragraph.

6. For its Answer to the fourth unnumbered paragraph, Ohio Edison admits that it installed a new meter and that it tested the previous meter. Ohio Edison denies the remaining allegations contained in the fourth unnumbered paragraph.

7. For its Answer to the fifth unnumbered paragraph, Ohio Edison denies the allegations contained in that paragraph for lack of knowledge.

8. For its Answer to the sixth unnumbered paragraph, Ohio Edison denies the allegations contained in that paragraph for lack of knowledge.

9. For its Answer to the seventh unnumbered paragraph, Ohio Edison denies the allegations contained in that paragraph.

For its affirmative defenses, Ohio Edison further avers that:

10. The Complaint fails to set forth reasonable grounds for a complaint, as Complainant has not alleged that Ohio Edison has violated any statute, rule, or tariff provision.

11. Ohio Edison at all times acted in accordance with its Tariff, PUCO No. 13, on file with the Public Utilities Commission of Ohio, as well as all rules and regulations as promulgated by the Public Utilities Commission of Ohio, the laws existing in the State of Ohio, and accepted standards and practices in the electric utility industry.

12. Ohio Edison reserves the right to raise additional defenses as warranted by discovery or otherwise in this matter.

WHEREFORE, having fully answered the Complaint, Ohio Edison respectfully requests that the instant action be dismissed, and that it be granted any other relief that this Commission may deem just and reasonable.

Respectfully submitted,

/s/ Carrie M. Dunn
Carrie M. Dunn (#0076952)
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On behalf of Ohio Edison Company

CERTIFICATE OF SERVICE

THIS IS TO CERTIFY that a copy of the foregoing Answer of Ohio Edison Company was served by regular U.S. Mail, postage prepaid, upon Harriet Shasby, 111 Withers Drive, Youngstown, OH 44512.

/s/ Carrie M. Dunn
Carrie M. Dunn
Attorney

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in

Case No(s). 12-2262-EL-CSS

Summary: Answer electronically filed by Ms. Carrie M Dunn on behalf of Ohio Edison Company