

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

PAUL BROWN,)	
)	
Complainant,)	
)	Case No. 12-2582-EL-CSS
v.)	
)	
OHIO EDISON COMPANY,)	
)	
Respondent.)	

ANSWER

In accordance with Ohio Adm. Code 4901-9-01(D), the Respondent, Ohio Edison Company (“Ohio Edison” or “the Company”), for its answer to the complaint of Paul Brown states:

FIRST DEFENSE

1. The Company admits that Mr. Brown’s service address is 2211 5th Ave., Youngstown, Ohio 44504.
2. The Company admits that Mr. Brown’s account number is 110015080069.
3. The Company admits that Mr. Brown is one of its customers.
4. The Company is without sufficient knowledge or information to either admit or deny that Mr. Brown “thought that [his] March 2012 bill was high.” The Company admits that Mr. Brown’s March 22, 2012 bill amount was \$1,099.53.
5. The Company admits that Mr. Brown “contacted Ohio Edison” on April 2, 2012, and that the Company “asked [Mr. Brown] to read the meter.”
6. The Company denies that “customer service agreed with the reading given, then adjusted [his] bill.” The Company avers that its customer service representative accepted Mr.

Brown's reading, but it does not admit that this reading was correct. The Company further avers that it rebilled Mr. Brown in accordance with the reading he provided.

7. The Company denies that "four months of estimated bills followed."

8. The Company is without sufficient knowledge or information to either admit or deny the allegation that Mr. Brown's "June became [sic] \$1355.57." The Company avers that Mr. Brown's July 25, 2012 bill stated that the amount due was \$1,355.57.

9. The Company denies that the "Commission should resolve to dissolve [Mr. Brown's] June 2012 billing and issue a bill more in line with [his] historical billings."

10. The Company avers that the allegation, "As far as my being able show [sic] in my complaint that this utility violated the law, discriminated against me, gave me inadequate service etc. is [sic] bias [sic] to all layman [sic] who lack the legal tools, or the necessary financial ability to pay for such tools," is not a complete sentence, does not present a complete thought, and therefore cannot be admitted or denied. The Company denies the allegation to the extent that it alleges any wrongdoing on the part of Ohio Edison.

11. The Company admits that Mr. Brown's meter was replaced on September 13, 2012.

12. The Company is without sufficient knowledge or information to either admit or deny that "something abnormal happen [sic] to [Mr. Brown's] meter during the period between March and June 2012." The Company avers that Mr. Brown's meter tested with 100.26 percent accuracy on September 14, 2012, and that Mr. Brown was notified of these results by mail on September 17, 2012.

13. The Company denies that it has a "flawed Estimation [sic] process."

14. The Company denies generally any allegations not specifically admitted or denied in this Answer, in accordance with Ohio Adm. Code 4901-9-01(D).

AFFIRMATIVE DEFENSES

SECOND DEFENSE

15. 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 allegations are not in numbered-paragraph, but narrative, form; many of the allegations and statements in the complaint are compound; and many of the allegations omit numerous details necessary to answer them. The Company has attempted, to the best of its ability, to answer the allegations, but reserves the right to amend its answers in the event it has incorrectly understood the allegations.

THIRD DEFENSE

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

FOURTH DEFENSE

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

FIFTH DEFENSE

18. The Company at all times complied with Ohio Revised Code Title 49; the applicable rules, regulations, and order of the Public Utilities Commission of Ohio; and the Company's tariffs. These statutes, rules, regulations, orders, and tariff provisions bar Complainant's claims.

SIXTH DEFENSE

19. The Company reserves the right to raise other defenses as warranted by discovery in this matter.

Accordingly, the Company respectfully requests an Order dismissing the complaint and granting it all other necessary and proper relief.

Dated: October 15, 2012

Respectfully submitted,

/s/ Gregory L. Williams

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ATTORNEYS FOR
OHIO EDISON COMPANY

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Answer was served to the following person
by U.S. mail on this 15th day of October, 2012:

Mr. Paul Brown
2211 5th Ave.
Youngstown, Ohio 44504

/s/ Gregory L. Williams
One of the Attorneys for Ohio Edison
Company

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in

Case No(s). 12-2582-EL-CSS

Summary: Answer to the Complaint electronically filed by Mr. Gregory L. Williams on behalf of Ohio Edison Company