

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Complaint)	
of Constance Kuyoth)	
Complainant,)	
)	
v.)	Case No. 12-2974-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 November 15, 2012.

1. Columbia admits that on May 31, 2012, it interrupted gas service to 13 of the residents of the Graystone Woods development after detecting unsafe levels of methane gas.
2. Columbia admits that Complainant was a customer of Columbia.
3. Columbia admits that Columbia personnel have tested the site for the presence of stray gas, as has Hull and Associates, an independent contractor agreed upon by both Columbia and the builder of the Graystone Woods development. Columbia has found levels at Complainant's house as high as 14.1%, while Hull found levels as high as 37.7%.
4. Columbia avers that it has asked government officials to sign off on the restoration of gas service as Columbia is not an expert on stray gas. In the absence of such governmental approval in addition to an effective remediation system, Columbia avers that it would be unsafe to restore natural gas service to the Complainant's residence because of the existence of stray methane gas from a source as yet unidentified.
5. Columbia admits that gas service has not been interrupted on Oakhaven Dr. due to the stray gas issue.
6. Columbia denies that it has discriminated against Complainant or the builder of Oakside development.
7. Columbia is without sufficient knowledge to either admit or deny the remaining statements in the Complaint.
8. Any allegation not expressly admitted herein is denied.

Affirmative Defenses

9. Columbia avers that 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 numbered paragraph form and contains numerous opinions and questions rather than specific allegations. As such, Columbia has been left to speculate on the meaning of the Complaint in order to respond to the allegations as required. Columbia reserves the right to amend its Answer in the event that it has incorrectly understood the allegations in the Complaint.
10. Columbia avers that the Complaint does not contain "a statement of relief sought," as required by Ohio Adm. Code 4901-9-01(B)
11. Columbia avers that the Complainant has failed to state reasonable grounds for a complaint against Columbia as required by Ohio Revised Code § 4905.26.
12. Columbia avers that it has complied with all applicable Ohio statutes, the Commission's rules and regulations and Columbia's tariff.
13. Columbia reserves the right to raise other defenses as warranted by discovery in this matter.

Respectfully Submitted by,

COLUMBIA GAS OF OHIO, INC.

/s/ Brooke E. Leslie _____
Brooke E. Leslie, Trial Attorney

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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 Constance Kuyoth at 2103 Oakside Rd, Toledo, Ohio 43615 on this 4th day of December 2012.

/s/ Brooke E. Leslie _____

Brooke E. Leslie

Attorney for

COLUMBIA GAS OF OHIO, INC.

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Summary: Answer electronically filed by Cheryl A MacDonald on behalf of Columbia Gas of Ohio, Inc.