

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Complaint)	
of Tina Lee)	
Complainant,)	
)	
v.)	Case No. 13-0593-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 March 6, 2013.

1. Columbia is without sufficient knowledge to either admit or deny whether Complainant's furnace was not working between January 2011 and June 2012.
2. Columbia denies that its gas meter located at 1298 East Gates Street, Columbus, Ohio 43206-3230 malfunctioned. Columbia avers that the actual meter reading taken on June 4, 2012 indicates that 1538 ccfs of gas was used at the address since the prior actual reading on April 11, 2011.
3. Columbia denies that it owes the customer a refund for gas usage from January 4, 2011 to June 4, 2012. Columbia avers that the actual meter reading taken on June 4, 2012 indicates that 1538 ccfs of gas was used at the address since the prior actual reading on April 11, 2011.
4. Columbia admits that Complainant continued to pay her gas bill through April 2012.
5. Columbia is without sufficient knowledge to either admit or deny the remaining allegations in the Complaint.
6. Any statement not expressly admitted herein is denied.

Affirmative Defenses

7. 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 irrelevant facts rather than specific allegations. As such, Columbia has been left to speculate as to the specific allegations in order to respond as required. Columbia reserves the right to amend its Answer in the event it has incorrectly understood the allegation in the Complaint.
8. Columbia avers that the Complainant has failed to state reasonable grounds for a complaint against Columbia as required by Ohio Revised Code § 4905.26.
9. The Public Utilities Commission of Ohio ("Commission") lacks jurisdiction over this matter. Complainant is solely seeking monetary damages in this proceeding, which the Commission is unable to grant.
10. Columbia avers that it has complied with all applicable Ohio statutes, the Commission's rules and regulations and Columbia's tariff.
11. 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 Tina Lee at 406 N. Guadalupe Street, Seguin, Texas 78155 on this 26th day of March 2013.

/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). 13-0593-GA-CSS

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