

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Complaint of:)	
)	Case No.
Seneca Builders, LLC,)	
)	
Complainant,)	
)	
v.)	
)	
Columbia Gas of Ohio, Inc.,)	
)	
Respondent.)	

COMPLAINT

Now comes Seneca Builders, LLC, by its undersigned counsel, and for its Complaint against Columbia Gas of Ohio, Inc., states as follows:

1. Seneca Builders, LLC owns a property at 2129 Oakside Road, Toledo, Ohio 43615 and, at that address, is a customer of Columbia Gas of Ohio, Inc., and has maintained accounts at various service addresses.
2. Columbia Gas of Ohio, Inc. seeks to provide natural gas service to Seneca Builders, LLC, at the aforementioned address and at the development that it is actively developing, known as Graystone Woods.
3. Columbia Gas of Ohio, Inc. has ceased to provide natural gas service without adequate basis for ceasing service.

4. On May 31, 2012, Columbia Gas of Ohio, Inc. interrupted natural gas service to Complainant's service address and other residences on Oakside Road based on an allegation that it had detected the presence of gas with an undetermined source and temporarily terminated service due to Columbia Gas' safety concerns.

5. Columbia Gas of Ohio, Inc. has never identified any source of any gas, and has not provided adequate and defensible evidence of the presence of gas at any residence on Oakside Road, including Complainant's.

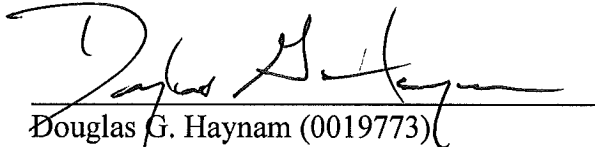
6. There has been no detection of methane gas or any other gas encountered in any home or crawl space on Oakside Road.

7. No public regulatory agency has determined the presence of methane gas on Oakside Drive.

8. Columbia Gas of Ohio, Inc. has failed to demonstrate with defensible evidence that there is any safety issue associated with providing gas to residences on Oakside Road and, therefore, its termination of service is wrongful and not in accordance with its obligations under the Ohio Revised Code and the Ohio Administrative Code.

WHEREFORE, Seneca Builders, LLC seeks restoration of natural gas service from Columbia Gas of Ohio, Inc. to the entirety of the Graystone subdivision or, in the alternative, seek compensation for the original money paid to Columbia Gas of Ohio, Inc. to provide service, loss of property, engineering and attorneys' fees, and all expenses relating to Columbia Gas' wrongful termination of service.

Respectfully submitted,



Douglas G. Haynam (0019773)

Shumaker, Loop & Kendrick, LLP

1000 Jackson

Toledo, Ohio 43604-5573

Telephone: 419.241.9000

Facsimile: 419.241.6894

dhaynam@slk-law.com

Attorneys for Complainant

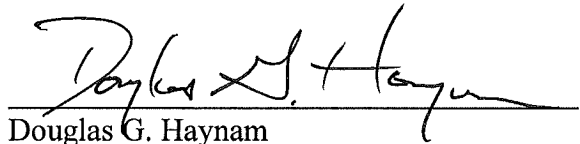
Seneca Builders LLC

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing Complaint has been deposited in the United States mail, postage prepaid, this 29th day of March, 2013, directed to the following:

Eric B. Gallon
Christen M. Blend
Porter Wright Morris & Arthur LLP
Huntington Center
41 South High Street
Columbus, Ohio 43215

Stephen B. Seiple
Brooke E. Leslie
200 Civic Center Drive
Columbus, Ohio 43216-0117



Douglas G. Haynam

Shumaker, Loop & Kendrick, LLP

Attorneys for Complainant

Seneca Builders LLC

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

3/29/2013 3:12:05 PM

in

Case No(s). 13-0766-GA-CSS

Summary: Complaint Service Letter Complaint electronically filed by Mr. Douglas G Haynam
on behalf of Seneca Builders, LLC