

CHARLES KING,
Complainant,

Case No. 13-703-GA-CSS

Respondent.

In accordance with Ohio Adm. Code 4901-9-01(D), the Respondent, The East Ohio Gas Company d/b/a Dominion East Ohio (“DEO” or “the Company”), for its Answer to the complaint of Charles King states:

1. DEO admits that Mr. King was a customer of the Company with account number ending 5119. DEO avers that Mr. King is currently a customer of the Company with account number ending 8270.

2. DEO denies that it “charged [Mr. King’s] account [ending 5119] for the period Nov 2006 [sic] through July 2007.” DEO avers that it charged Mr. King’s account from November 2006 through June 20, 2007, at which point natural gas service was disconnected for nonpayment. DEO further avers that his delinquent balance for account ending 5119 was \$3,619.02 and that his final bill was due on July 18, 2007.

3. DEO denies that “the reading for said period [that is, the nine-month period from November 2006 through July 2007] were estimates.” DEO avers that Mr. King’s meters were estimated every other month during that period, as permitted under the Commission’s rules, *see*

Ohio Adm. Code 4901:1-13-04(G)(1), and the Company's Commission-approved tariff, *see* Rules and Regulations, Sheet No. K5, Section 2, Item 18 "Meter Reading."

4. DEO is without sufficient knowledge or information to either admit or deny whether "during said period," that is from November 2006 through July 2007, Mr. King "did not occupy subject property." DEO is without sufficient knowledge or information to either admit or deny whether "Countrywide Bank had foreclosed [sic]" and whether Mr. King "vacated said premises October 2006 [sic]." DEO avers that it has no record of Mr. King contacting the Company at any time in 2006 to disconnect service.

5. DEO is without sufficient knowledge or information to either admit or deny whether Mr. King "did not receive a final bill or notification until July of 2012." DEO avers that it sent a final bill for account ending 5119 to Charles C. King Jr. c/o Charles King, P.O. Box 21633, Cleveland, Ohio 44121, on July 2, 2007. A copy of this bill is attached to this Answer.

6. DEO admits that Mr. Jones is "currently paying the pas-due [sic] amount." DEO avers that a delinquent balance of \$3,436.34 was transferred to account ending 8270, for which Mr. Jones is enrolled in and current on a 12-month budget plan.

7. DEO 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

8. 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 Answer in the event it has incorrectly understood the allegations.

THIRD DEFENSE

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

FOURTH DEFENSE

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

FIFTH DEFENSE

11. The complaint is barred by the doctrines of laches, estoppel, and waiver.

SIXTH DEFENSE

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

SEVENTH DEFENSE

13. 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.

Date: April 8, 2013

Respectfully submitted,

/s/ Gregory L. Williams

Mark A. Whitt (Counsel of Record)

Andrew J. Campbell

Gregory L. Williams

WHITT STURTEVANT LLP

The KeyBank Building

88 East Broad Street, Suite 1590

Telephone: (614) 224-3946

Facsimile: (614) 224-3960

whitt@whitt-sturtevant.com

campbell@whitt-sturtevant.com

williams@whitt-sturtevant.com

ATTORNEYS FOR

THE EAST OHIO GAS COMPANY D/B/A

DOMINION EAST OHIO

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 8th day of April, 2013:

Charles King
736 East 232nd Street
Cleveland, Ohio 44123

/s/ Gregory L. Williams
Gregory L. Williams

One of the Attorneys for The East Ohio Gas
Company d/b/a Dominion East Ohio

CHARLES C KING JR

Page 1 of 2

2196 N TAYLOR RD
CLEVELAND HEIGHTS OH 44112-3002Account Number Date Prepared
9 5000 2521 5119 July 2, 2007

For questions about Dominion East Ohio charges call 216-361-2345.

Summary of Payment Due

(See Next Page for Usage Comparison and Meter Readings)

Current Gas Amount	20.88
Past Due Gas Amount	3,562.89
Dominion Products & Services Other Past	35.25
Total Payment Due by July 18, 2007	\$3,619.02

Please Pay Account Balance of \$3,619.02 by July 18, 2007**Final Bill Notice -- Dropped from Energy Choice**

Dominion East Ohio shut off service to you because of your overdue, unpaid account balance. This is your last bill for this account, which is now closed. We removed you from the Energy Choice program and have notified your natural gas supplier. If you wish to establish service with us again, you will need to pay the remaining account balance and a security deposit. You will also have to pay a reconnection fee if you remain at the same address.

To be eligible to enroll again in the Energy Choice program, you must pay all dollars owed or be eligible for a payment plan. When you can participate in the Energy Choice program, you will be able to purchase gas from any participating natural gas supplier at a new contracted rate.

Please detach and return this coupon with a check made payable to Dominion East Ohio. Please see reverse side for mailing address change instructions.

PLEASE PAY BY Jul 18, 2007 **Account No.** 9 5000 2521 5119

FINAL BILL

\$3,619.02

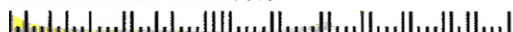
Account Balance

Amount Enclosed

13

View and Pay Your Bill On-Line

Save time and money by receiving and paying your bills electronically. Learn more or enroll in eBill by visiting 'Manage Your Account' on www.dom.com. It's worth the trip!

CHARLES C KING JR
C/O charles king
PO BOX 21633
CLEVELAND OH 44121-0633DOMINION EAST OHIO
PO BOX 26785
RICHMOND VA 23261-6785

0195000252151190000000001044000003619022

2196 N TAYLOR RD
CLEVELAND HEIGHTS OH 44112-3002

Account Number Date Prepared
9 5000 2521 5119 July 2, 2007

For questions about Dominion East Ohio charges call 216-361-2345.

Credits and Charges Since Your Last Bill

Balance From Last Bill	\$3,894.80
Security Deposit Credit	315.00 CR
Security Deposit Interest	6.47 CR
Balance	\$3,573.33

Current Charges**Dominion East Ohio Distribution Charges**

Monthly Service Charge	\$5.70
Gas Transportation Charge	.78
Total Dominion East Ohio Charges	\$6.48

For questions about transportation (delivery) charges, call Dominion East Ohio at 216-361-2345.

Dominion East Ohio Energy Charges

Gas Cost .3 MCF @ \$12.25	\$3.68
Sales Tax	.28
Total Dominion East Ohio Energy Charges	\$3.96

For questions about gas supply costs, contact Dominion East Ohio Energy (acct# 1288153030082006) at 1-800-990-4090 or 1201 Pitt St. Pittsburgh, PA 15221 or www.dom.com.

Total Current Gas Charges	\$10.44
Total Gas Charges Balance	\$3,583.77

Dominion Products & Services Credits and Charges

Balance From Last Bill	\$35.25
Balance	\$35.25
Dominion Prods & Svcs Account Balance	\$35.25

For questions about Dominion Products and Services charges, contact 1-800-562-8419 or P.O. Box 298 Pittsburgh PA 15230-0298 or www.dom.com.

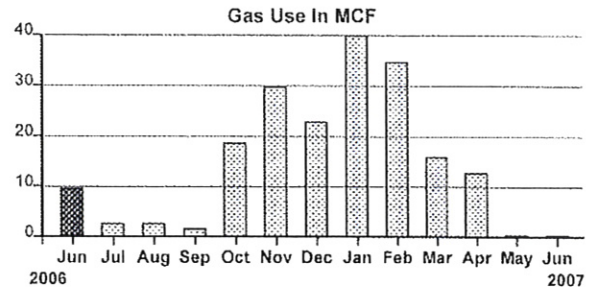
Total Current Charges	\$10.44
Total Account Balance	\$3,619.02

This is your Final Bill.

This is your last electronic bill. We have also sent a paper copy to your forwarding address via U.S. mail.

Monthly Usage Comparison

Average Daily Temperature For This Billing Period	2006 66°F	2007 69°F
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Average monthly use: 15.3 MCF.
Total annual use: 183.5 MCF.

Billing Period And Meter Readings

Date	Meter Number	Read Type	Reading	Difference
	10607101			
Jun 20, 2007		Estimate	601.3	
May 25, 2007		Remote	601.0	.3
MCF Used in 26 Days				.3

CHARLES C KING JR
C/O charles king
PO BOX 21633
CLEVELAND OH 44121-0633



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in

Case No(s). 13-0703-GA-CSS

Summary: Answer to the Complaint of Charles King electronically filed by Mr. Gregory L. Williams on behalf of The East Ohio Gas Company d/b/a Dominion East Ohio