

1. Ohio Edison is a public utility, as defined by R.C. §4905.03(C), and is duly organized and existing under the laws of the State of Ohio.
2. While the Complaint consists of one unnumbered page with an attachment, Ohio Edison will attempt to specifically answer the different allegations within the Complaint.
3. Ohio Edison admits that it has estimated Complainant's usage on occasion.
4. In conformance with Ohio Admin. Code 4901:1-10-05(I)(1), Ohio Edison has made reasonable attempts to obtain actual readings of Complainant's meter, and an actual reading of Complainant's meter has been made at least once each calendar year.
5. Ohio Edison made actual readings of Complainant's meter in six of the last twelve months, including most recently: September 2012, October 2012, December 2012, January 2013, and April 2013.

6. Complainant's March 2013 bill, which is attached to the Complaint, was based upon estimated usage rather than an actual meter reading due to the presence of an unsecured dog on the premises, as noted at the top of the bill, which states "Bill Based On: Estimated Meter Reading, Dog."

7. Ohio Edison denies that it is overcharging Complainant and further denies that it is seeking to make extra profit at Complainant's expense, as is alleged in the Complaint.

8. In each instance where Complainant's bills are based upon estimated usage, Ohio Edison reconciles its estimate(s) with Complainant's actual usage as determined at the next actual meter reading, and therefore, Complainant has not been overcharged.

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

AFFIRMATIVE DEFENSES

SECOND DEFENSE

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

THIRD DEFENSE

11. The Complaint fails to state a claim upon which relief can be granted.

FOURTH DEFENSE

12. Ohio Edison at all times complied with Ohio Revised Code Title 49; the applicable rules, regulations, and orders of the Public Utilities Commission of Ohio; and Tariff, PUCO No. 11, on file with the Public Utilities Commission of Ohio. These statutes, rules, regulations, orders, and tariff provisions bar Complainant's claims.

FIFTH DEFENSE

13. Ohio Edison reserves the right to raise other defenses as warranted by discovery in this matter.

WHEREFORE, Ohio Edison Company respectfully requests an Order dismissing the Complaint and granting Ohio Edison Company all other necessary and proper relief.

Respectfully submitted,

s/Christine E. Watchorn

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On behalf of Ohio Edison Company

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Answer was served by U.S. mail to the following person on this 15th day of April, 2013:

Donald Sindledacker
3261 Warren-Ravenna Road
Newton Falls, Ohio 44444

/s/ Christine E. Watchorn
One of the Attorneys for
Ohio Edison Company

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Summary: Answer electronically filed by Ms. Christine E. Watchorn on behalf of Ohio Edison Company