BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Complaint)	
of Arminee Apoian,)	
	Complainants,)	
v.)	Case No. 13-1318-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 June 3, 2013.

- 1. Columbia admits that the Complainant was at all relevant times a customer of Columbia.
- 2. Columbia admits that Columbia responded to questions posed by Graystone Woods residents on June 11, 2012. Columbia avers that the questions listed in the Complaint appear in large part to be the questions presented by Graystone Woods residents, albeit with some typographical errors, changes, and omissions. Columbia further avers that the responses contained in the Complaint in italics appear in large part to be the responses provided by Chris Kozak, albeit with some typographical errors, changes, and omissions.
- 3. Columbia is without sufficient knowledge or information to form a belief as to the truth of the allegations in the second and third full paragraphs on the second page of the Complaint.

Affirmative Defenses

- 1. Columbia avers that the Complainants have failed to state reasonable grounds for a complaint against Columbia as required by Ohio Revised Code § 4905.26.
- 2. Columbia avers that it has complied with all applicable Ohio statutes, the Commission's rules and regulations, and Columbia's tariff.

- 3. Columbia avers that the Commission lacks statutory authority to award monetary damages as requested in the Complaint.
- 4. Columbia reserves the right to raise other defenses as warranted by discovery in this matter.

Respectfully submitted,

/s/ Eric B. Gallon

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Attorneys for Respondent COLUMBIA GAS OF OHIO, INC.

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing Answer of Respondent Columbia Gas of Ohio, Inc. was served by regular mail on this 24th day of June, 2013, upon the Complainant at the following addresses:

Dr. Arminee Apoian, M.D. 2134 Oakside Road Toledo, OH 43615

/s/ Eric B. Gallon
Eric B. Gallon

COLUMBUS/1679742v.1

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Case No(s). 13-1318-GA-CSS

Summary: Answer electronically filed by Mr. Eric B. Gallon on behalf of Columbia Gas of Ohio, Inc.