

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Complaint of Jon	)	
Cook,	)	
Complainant,	)	
v.	)	Case No. 14-0406-GA-CSS
	)	
Columbia Gas of Ohio, Inc.,	)	
Respondent.	)	

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**ANSWER OF COLUMBIA GAS OF OHIO, INC.**

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Pursuant to Ohio Adm. Code 4901-9-01(D), the Respondent, Columbia Gas of Ohio, Inc. ("Columbia"), files its Answer to the Complaint of Jon Cook ("Complainant") filed herein on March 13, 2014:

1. Columbia admits that the Complainant is the customer of record for a natural gas service account at 1225 North Limestone Street, Springfield, Ohio 45503 (the "Premises"). Columbia admits that it contacted the Complainant in August 2011; however, Columbia avers this contact was to install an automated meter reading ("AMR") device on Columbia's meter in the Complainant's basement. Columbia admits that it was given access by the Complainant to install the AMR device and avers that such device was installed. Columbia further avers that the Complainant also had a remote meter index device previously installed at his home, which Columbia was no longer utilizing in lieu of the AMR device. Columbia denies the remaining allegations in paragraph 1.

2. Columbia denies the allegations in paragraph 2, and denies that the Complainant is entitled to the relief requested in paragraph 2.

3. Columbia is without sufficient knowledge or information to either admit or deny the allegation as to the Complainant's daughter's residency at the Premises. Columbia avers that the Complainant's gas consumption seasonally

varied after December 31, 2012. Columbia denies the remaining allegations in paragraph 3.

4. Columbia avers that it can provide the Complainant with copies of any federal or state statutes regulating gas utilities. Columbia avers that the Complainant has been a good-paying customer since March 20, 1969. Columbia denies the remaining allegations contained in paragraph 4.

5. Columbia is without sufficient knowledge to either admit or deny the allegation regarding communications between the Complainant and the Public Utilities Commission of Ohio. Columbia denies the remaining allegations of paragraph 5.

6. Columbia denies the allegations contained in paragraphs 6 through 11.

7. Columbia admits that it has sent the Complainant numerous written notifications requesting access to inspect his meter, pursuant to 49 CFR 192, Ohio Adm. Code 4901:1-16-03, and Ohio Adm. Code 4901:1-13-04(C). Columbia avers that it may disconnect the Complainant's gas service for refusing Columbia access to read and inspect its meter and facilities pursuant to Ohio Adm. Code 4901:1-18-03(E)(1) and (2). Columbia further avers that, pursuant to Ohio Adm. Code 4901-9-01(E), it will not disconnect the Complainant's gas service during the pendency of this proceeding if ordered to do so by the Commission. Columbia denies the remaining allegations contained in paragraph 12.

8. Columbia denies generally any allegations not specifically denied in this Answer, pursuant to Ohio Adm. Code 4901-9-01(D).

#### **AFFIRMATIVE DEFENSES**

9. Columbia avers that the Complainant has failed to state reasonable grounds for a complaint against Columbia, pursuant to R.C. 4905.26.

10. Columbia avers that it has complied with all applicable Ohio statutes; the Commission's rules, regulations and order; and Columbia's tariff. These statutes, rules, regulations, orders and tariff provisions bar Complainant's claims.

11. Columbia reserves the right to raise other defenses as warranted by discovery in this matter.

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

Respectfully submitted by,

**COLUMBIA GAS OF OHIO, INC.**

/s/ Melissa L. Thompson

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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 the following this 2nd day of April, 2014:

Jon Cook  
1225 N. Limestone St.  
Springfield, OH 45503

/s/ Melissa L. Thompson  
Melissa L. Thompson

**Attorney for**  
**COLUMBIA GAS OF OHIO, INC.**

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**4/2/2014 4:27:19 PM**

**in**

**Case No(s). 14-0406-GA-CSS**

Summary: Answer of Columbia Gas of Ohio, Inc. electronically filed by Ms. Melissa L. Thompson on behalf of Columbia Gas of Ohio, Inc.