

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Complaint of)	
John Stuart Mill I, Ltd.,)	
Complainant,)	
v.)	Case No. 14-1994-GA-CSS
)	
Columbia Gas of Ohio, Inc.,)	
Respondent.)	

ANSWER OF COLUMBIA GAS OF OHIO, INC.

Pursuant to Ohio Adm. Code 4901-9-01(D), the Respondent, Columbia Gas of Ohio, Inc. ("Columbia"), and files its Answer to the Complaint of John Stuart Mill I, Ltd. filed herein on December 29, 2014:

1. Columbia admits that John Stuart Mill I, Ltd., an Ohio limited liability company (the "Company"), is the customer of record for a natural gas service account, but denies the Company's natural gas service address is 4932 N. High Street, Columbus, Ohio 43214. Columbia avers that the Company's natural gas service address was 4954 N. High Street, Columbus, Ohio 43214, and Columbia admits this service account has been disconnected. Columbia further avers that Ronald G. Kennedy is the registered statutory agent for the Company with the Ohio Secretary of State. Columbia further avers that Mr. Kennedy is not a licensed attorney in the state of Ohio.

2. Columbia denies that it bored and left uncovered a 3½-foot by 2½-foot hole in the property located at 4932 N. High Street, Columbus, Ohio 43214. Columbia further avers that 4932 N. High Street is located on Franklin County Tax Parcel ID Number 010-110843, property owned by the Company (the "Premise").

3. Columbia is without sufficient knowledge or information to admit or deny the allegation that the Company received several complaints regarding the alleged hole at the Premise.

4. Columbia is without sufficient knowledge or information to admit or deny the allegations regarding an unmarked truck drilling at the Premise; the Company's representative going to the property; the Company's representative finding a hole, Ohio Utility Protection Service ("OUPS") markings, Miller Pipeline Equipment; and Northern Pipeline Equipment.

5. Columbia denies that an executive talked with the Company. Columbia admits that Northern Pipeline was storing its equipment on the property south of the Premise, and Columbia admits that Northern Pipeline was not working at the Premise.

6. Columbia is without sufficient knowledge or information to admit or deny that Miller Pipeline damaged an electric service line to a pylon located at the Premise.

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

AFFIRMATIVE DEFENSES

8. Columbia avers that 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 Complaint is not in numbered paragraph form and contains numerous opinions and irrelevant facts rather than specific allegations. As such, Columbia has been left to speculate as to the specific allegations in order to respond as required. Columbia reserves the right to amend its Answer in the event it has incorrectly understood the allegation in the Complaint.

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 and regulations, and Columbia's tariff. Columbia further avers that its compliance with statutes, rules, regulations, orders and its tariff provisions bar Complainant's claims.

11. Columbia avers that Complainant is not represented by an attorney-at-law as required by R.C. 4705.07, Ohio Adm. Code 4901-1-08(A), and

Gov. Bar R. VII, Section 2(A), and such lack of representation provides grounds for dismissal.

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

Respectfully submitted by,
COLUMBIA GAS OF OHIO, INC.

/s/ Melissa L. Thompson
Melissa L. Thompson, Trial Attorney

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Attorneys for
COLUMBIA GAS OF OHIO, INC.

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing Answer of Respondent Columbia Gas of Ohio, Inc., by ordinary U.S. mail, postage prepaid, to the following this 20 day of January, 2015:

John Stuart Mill I, Ltd.
c/o R.G. Kennedy and Assoc.
995 Goodale Blvd.
Columbus, Ohio 43212

/s/ Melissa L. Thompson

Melissa L. Thompson

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

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