

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

MICHELE WILSON,)	
)	
Complainant,)	
)	
v.)	Case No. 15-469-GA-CSS
)	
THE EAST OHIO GAS COMPANY D/B/A)	
DOMINION EAST OHIO,)	
)	
Respondent.)	

ANSWER

In accordance with Ohio Adm. Code 4901-9-01(D), the Respondent, The East Ohio Gas Company (DEO or the Company), for its answer to the complaint of Michele Wilson, states:

FIRST DEFENSE

1. DEO admits that Ms. Wilson was a residential customer receiving natural gas service under an account ending 6733 at 581 Hines Hill Road, Hudson, Ohio 44236 (the Premises).
2. DEO admits that gas service was supplied to the Premises under this account between August 3, 2009, and June 1, 2011.
3. DEO admits that gas service was terminated to the Premises on June 1, 2011, for nonpayment of a balance of \$2,204.01.
4. DEO is without sufficient knowledge or information to admit or deny that Ms. Wilson lived in the premises for “just a few months” following August 2009. DEO avers that records and statements received from Ms. Wilson suggest that she occupied the Premises until at least March 2010.

5. DEO avers that it received two energy assistance payments on Ms. Wilson's account totaling \$325.00 in March and April 2010. DEO avers that other than these payments, no payments were received on the account between August 3, 2009, and June 1, 2011.

6. DEO avers that it has no record of Ms. Wilson requesting that service be turned off at the Premises in 2009 or at any other time.

7. DEO denies that "meet[ing] . . . inside the home" was a requisite to disconnecting service. DEO avers that the Premises is served by an exterior meter and that access to the Premises was not required to disconnect service.

8. DEO admits that it received a copy of a police report from Ms. Wilson. DEO avers that the report is dated April 9, 2010.

9. DEO denies that Ms. Wilson supplied a copy of a lease for a different residence dated February 2009. DEO avers that it received a copy of a single page of a lease for a different residence with a start date of March 16, 2010, and that the copy was missing any signature page.

10. DEO is without sufficient knowledge or information to admit or deny the remaining allegations in the complaint, and generally denies any allegations not specifically admitted or denied in this Answer in accordance with Ohio Adm. Code 4901-9-01(D).

AFFIRMATIVE DEFENSES

SECOND DEFENSE

11. 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

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

FOURTH DEFENSE

13. The complaint does not set forth a claim for which relief may be granted.

FIFTH DEFENSE

14. The complaint is barred by laches, waiver, and estoppel.

SIXTH DEFENSE

15. Claims alleged in the complaint are not within the subject-matter jurisdiction of the Commission.

SEVENTH DEFENSE

16. DEO at all times complied with the 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 Ms. Wilson's claims.

EIGHTH DEFENSE

17. DEO reserves the right to raise other defenses as warranted by discovery in this matter.

WHEREFORE, DEO respectfully requests an Order dismissing the complaint and granting it all other necessary and proper relief.

Dated: March 27, 2015

Respectfully submitted,

/s/ Andrew J. Campbell

Mark A. Whitt (0067996)

Andrew J. Campbell (0081485)

Rebekah J. Glover (0088798)

WHITT STURTEVANT LLP

The KeyBank Building, Suite 1590

88 East Broad Street

Columbus, Ohio 43215

Telephone: (614) 224-3946

Facsimile: (614) 224-3960

whitt@whitt-sturtevant.com

campbell@whitt-sturtevant.com

glover@whitt-sturtevant.com

(All counsel are willing to accept service by
email)

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 by mail to the following person this 27th day of March, 2015:

Michele Wilson
1727 Edwards Ave NE
Canton, Ohio 44705

/s/ Rebekah J. Glover
One of the Attorneys for The East Ohio Gas
Company d/b/a Dominion East Ohio

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Case No(s). 15-0469-GA-CSS

Summary: Answer electronically filed by Ms. Rebekah J. Glover on behalf of The East Ohio Gas Company d/b/a Dominion East Ohio