

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

ORWELL NATURAL GAS COMPANY

Case No. 15-0475-GA-CSS

Complainant,

v.

ORWELL-TRUMBULL PIPELINE
COMPANY, LLC,

Respondent.

ANSWER

For its answer to the complaint of Orwell Natural Gas Company (“ONG”), respondent Orwell-Trumbull Pipeline Company, LLC (“OTP”) states as follows:

- 1) OTP admits the allegations of paragraph 1 of the Complaint.
- 2) OTP admits the allegations of paragraph 2 of the Complaint.
- 3) OTP admits the allegations of paragraph 3 of the Complaint.
- 4) OTP admits the allegations of paragraph 4 of the Complaint.
- 5) OTP admits the allegations of paragraph 5 of the Complaint.
- 6) In response to paragraph 6 of the Complaint, OTP admits only that the PUCO has jurisdiction over the matters raised by Complainant.
- 7) In response to paragraph 7 of the Complaint, OTP incorporates its responses to the foregoing paragraphs as though repeated herein.
- 8) OTP admits the allegations of paragraph 8 of the Complaint.

- 9) OTP admits only that on or about March 5, 2015, it notified ONG that a system fed by OTP off of Vrooman Road in Lake County would be shut down while a pipeline was relocated.
- 10) OTP denies the allegations of paragraph 10 of the Complaint.
- 11) OTP admits only that it advised ONG to have personnel prepared to relight the system once OTP came back on line as alleged the allegations of paragraph 11 of the Complaint.
- 12) OTP admits that it owns the pipeline as alleged in paragraph 12 of the Complaint, but denies any knowledge of any legitimate dispute concerning its ownership.
- 13) OTP denies the allegations of paragraph 13 of the Complaint.
- 14) OTP denies the allegations of paragraph 14 of the Complaint.
- 15) OTP denies any violations of Ohio law or Commission regulations as alleged within paragraph 15 of the Complaint.

COUNT ONE

- 16) In response to paragraph 16 of the Complaint, OTP incorporates its responses to the foregoing paragraphs as though repeated herein.
- 17) OTP states only that the statute speaks for itself, and denies the remaining allegations of paragraph 17 of the Complaint.
- 18) OTP states only that the statute speaks for itself, and denies the remaining allegations of paragraph 18 of the Complaint.
- 19) OTP denies the allegations of paragraph 19 of the Complaint.

COUNT TWO

20) In response to paragraph 20 of the Complaint, OTP incorporates its responses to the foregoing paragraphs as though repeated herein.

21) OTP denies the allegations of paragraph 21 of the Complaint.

22) OTP states only that the statute speaks for itself, and denies the remaining allegations of paragraph 22 of the Complaint.

23) OTP denies the allegations of paragraph 23 of the Complaint.

WHEREFORE Respondent respectfully requests that the Commission grant it the following relief.

- 1) Dismiss Complainant's complaint, or
- 2) Find that the Complaint has set forth no grounds entitling Complainant to relief.
- 3) Award Respondent its attorneys' fees as statutorily authorized.
- 4) Order such other relief the Commission deems appropriate and just.

Respectfully submitted,

/s/ Michael D. Dortch
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ORWELL TRUMBULL
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CERTIFICATE OF SERVICE

The PUCO's e-filing system will serve notice of this filing upon counsel for the Complainant.

Further, I hereby certify that a true and accurate copy of the foregoing was served upon counsel for the Complainant this April 3, 2015, by depositing the same in the United States Mail, postage prepaid, addressed as follows:

Gina M. Piacentino, Esq.
Weldele & Piacentino Law Group
88 East Broad Street, Suite 1560
Columbus, OH 43215

/s/ Michael D. Dortch

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Case No(s). 15-0475-GA-CSS

Summary: Answer by Orwell Trumbull Pipeline Company, LLC electronically filed by Mr. Michael D. Dortch on behalf of Orwell-Trumbull Pipeline Company, LLC