

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Complaint of)	
Corey Hughes)	
)	
Complainant,)	Case No. 15-1532-GA-CSS
v.)	
)	
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"), files its Answer to the Complaint of Corey Hughes ("Hughes" or "Complainant") filed herein on August 31, 2015:

1. Columbia admits it provides distribution service to 665 South 15th Street, Sebring, Ohio 44672 ("Premise"). Columbia further avers the customer of record at the Premise is not Corey Hughes, but Columbia further avers that it believes Corey Hughes is a consumer at the Premise.

2. Columbia admits it replaced the service line at the Premise in October 2013.

3. Columbia is without sufficient knowledge or information to either admit or deny the allegations regarding damage to the concrete driveway, the concrete pad at the house, the front door, electric to the outside light, restoration of the yard, or the corner of the Premise. Columbia further avers it expects to amend its Answer upon completion of a more thorough investigation into this Complaint.

4. Columbia denies allegations related to a collapsed storm water lateral at the Premise. Columbia further avers it expects to amend its Answer upon completion of a more thorough investigation into this Complaint.

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

AFFIRMATIVE DEFENSES

6. 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 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.

7. Columbia avers that Mr. Hughes fails to state reasonable grounds for a complaint against Columbia, pursuant to R.C. § 4905.26. Columbia further avers Mr. Hughes brings claims that the Public Utilities Commission of Ohio ("Commission") is not authorized to adjudicate (including claims for property damages) and requests relief that the Commission is not authorized to award. Columbia has been left to speculate as to the relief requested by Mr. Hughes in order to respond as required. Columbia reserves the right to amend its Answer in the event it has incorrectly understood the relief requested in the Complaint.

8. Columbia avers that it has complied with all applicable Ohio statutes; the Commission's rules, regulations and orders; and Columbia's tariff. Columbia further avers that its compliance with statutes, rules, regulations, orders and its tariff provisions bar Mr. Hughes' claims.

9. 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/ Joseph M. Clark

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CERTIFICATE OF SERVICE

The Public Utilities Commission of Ohio's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the service list of the docket card who have electronically subscribed to the case. In addition, the undersigned hereby certifies that a copy of the foregoing document is also being served via ordinary U.S. Mail, postage prepaid on this 21st day of September, 2015 upon the parties listed below.

Corey Hughes
665 South 15th Street
Sebring, Ohio 44672

/s/ Joseph M. Clark

Joseph M. Clark

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

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in

Case No(s). 15-1532-GA-CSS

Summary: Answer electronically filed by Cheryl A MacDonald on behalf of Columbia Gas of Ohio, Inc.