

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

MARTHA DARROW)	
)	
Complainant,)	
)	Case No. 15-2132-EL-CSS
v.)	
)	
OHIO EDISON COMPANY)	
)	
Respondent.)	
)	

ANSWER OF OHIO EDISON COMPANY

In accordance with Rule 4901-9-01(D), Ohio Administrative Code, Respondent Ohio Edison Company (“Ohio Edison”) for its answer to the Complaint of Martha Darrow (“Complainant”) states:

FIRST DEFENSE

1. Ohio Edison is a public utility, as defined by Section 4905.03(A)(4) Revised Code, and is duly organized and existing under the laws of the State of Ohio.
2. Complainant’s Complaint consists of two unnumbered pages. Ohio Edison will attempt to specifically answer each allegation. To the extent Ohio Edison does not respond to a specific allegation, Ohio Edison denies such allegation.
3. Ohio Edison admits that a squirrel had made contact with the energized equipment that services Complainant’s home and caused a fuse to fail on the transformer that feeds Complainant’s home. The squirrel making contact with the energized equipment was not in the control of the company. Ohio Edison further states that the repairman promptly replaced the failed fuse and restored the service to normal.
4. The second unnumbered page speaks for itself and no further response is necessary.

5. Ohio Edison denies the remaining allegations in the Complaint.

AFFIRMATIVE DEFENSES

SECOND DEFENSE

6. The Complaint fails to set forth reasonable grounds for complaint, as required by Section 4905.26, Revised Code.

THIRD DEFENSE

7. The Complaint fails to state a claim upon which relief can be granted.

FOURTH DEFENSE

8. Ohio Edison at all times complied with Ohio Revised Code Title 49; the applicable rules, regulations, and order of the Public Utilities Commission of Ohio; and Tariff, PUCO No. 11, on file with the Public Utilities Commission of Ohio. These statutes, rules, regulations, orders, and tariff provisions bar Complainant's claims.

FIFTH DEFENSE

9. The Complaint appears to be written by another person other than Complainant who lacks standing to bring the Complaint.

SIXTH DEFENSE

10. Ohio Edison reserves the right to raise other defenses as warranted by discovery in this matter.

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

Respectfully submitted,

/s/ Carrie M. Dunn
Carrie M. Dunn (#0076952)
Counsel of Record
FirstEnergy Service Company
76 South Main Street
Akron, Ohio 44308
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On behalf of Ohio Edison Company

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Answer was served by U.S. mail to the following person on this 12th of January 2016.

Martha Darrow
823 Perkinswood Blvd NE
Warren, Ohio 44484

/s/ Carrie M. Dunn
Attorney for Ohio Edison Company

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in

Case No(s). 15-2132-EL-CSS

Summary: Answer electronically filed by Ms. Carrie M Dunn on behalf of Ohio Edison Company