

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

John and Kelly Rashedi)	
39406 Evergreen Drive)	
Avon, Ohio 44011,)	
)	
Complainant,)	Case No. 16-0718-GA-CSS
)	
v.)	
)	
Constellation Energy Services - Natural Gas, Inc.,)	
)	
Respondent.)	

ANSWER OF CONSTELLATION ENERGY SERVICES-NATURAL GAS, INC.

Constellation Energy Services – Natural Gas, Inc. (“Constellation”) files this Answer to the Complaint of John and Kelly Rashedi (“the Rashedis”) as follows:

1. Constellation is without sufficient knowledge or information to form a belief as to the truth of the allegation that the Rashedis started this service on July 18, 2013 with Columbia Gas of Ohio.
2. Constellation is without sufficient knowledge or information to form a belief as to the truth of the allegation that the Rashedis never selected Constellation as a supplier.
3. Constellation is without sufficient knowledge or information to form a belief as to the truth of the allegation that the Rashedis found in 2014 that Constellation was supplying gas to them. Constellation denies that it was supplying gas to the Rashedis at a very high rate.
4. Constellation is without sufficient knowledge or information to form a belief as to the truth of the allegation that the Rashedis contacted Constellation Energy Gas Choice, Inc. to cancel service. Constellation denies the allegation that the switch took two months to complete.

Constellation denies any ability to control the date of natural gas switch as the supplier is solely dependent upon Columbia Gas in determining the effective date of a change to supply.

5. Constellation is without sufficient knowledge or information to form a belief as to the truth of the allegation that the Rashedis are finding that Constellation became their gas supply company again without their knowledge.

6. Constellation admits that the Rashedis are seeking credit from the difference between Constellation and Columbia Gas from July 18, 2013 until the present. In response to this allegation, Constellation will be offering a monetary settlement to the Rashedis.

7. On May 10, 2016, Constellation representatives reached out to Mr. John Rashedi by phone to convey the details of his account timeline. Mr. Rashedi indicated he did not wish to discuss this information with Constellation and asked Constellation to respond only to the PUCO.

8. While Constellation was not able to discuss the account history with Mr. Rashedi, Constellation did investigate and determine the following timeline of events.

9. On 12/4/2007 at 7:52:57 a.m., Ms. Kelly Rashedi enrolled Columbia Gas Customer No. XXXXXXXX (Service Address: 4786 Belmont Drive, Avon, Ohio 44011) with MX Energy, Inc. ("MX Energy") via www.mxenergy.com.

10. On 6/1/2012, MX Energy was acquired by Constellation and the supplier name was changed to Constellation Energy Gas Choice, Inc.

11. On 9/10/2013, Constellation received an inbound notice from Columbia Gas to update the utility account number for this customer from XXXXXXXX to XXXXXXXX with an effective date of 7/17/2013 due to a premises move by the customer. The service address was

updated to 39406 Evergreen Drive, Avon, Ohio 44011. There is no record of customer contacting Constellation to cancel account.

12. On 3/25/2014, Integrys Energy Services – Natural Gas, Inc. (“Integrys”) received an online enrollment from Ms. Kelly Rashedi to supply natural gas to Columbia Gas Customer No. XXXXXX at 39406 Evergreen Drive, Avon, Ohio 44011 with a start date of 5/1/2014.

13. On 3/25/2014, Constellation received an inbound drop request from Columbia Gas for utility account number XXXXXX with an effective date of May 1, 2014. *It is important to note that during this time, there was no connection between Integrys and Constellation as they were operating independently of one another.*

14. On 4/21/2014, Constellation responded to a PUCO complaint regarding the July 17, 2013 transfer of supply service to the customer. As previously indicated in Constellation’s response, Constellation updated its records based upon the information received from the utility as the correct course of action.

15. On 5/15/2014, Integrys received an inbound drop request from Columbia Gas for utility account number XXXXXX with an effective date of 6/1/2014.

16. On 6/28/2014, Constellation received an inbound enrollment request from Columbia Gas for utility account number XXXXXX with a back-dated effective date of 6/1/2014. This was a utility initiated enrollment as part of a Standard Choice Offer (“SCO”) where Constellation was awarded the auction supply.

17. On 7/9/2014, Columbia Gas via online Aviator Portal, notified Integrys that Mr/s. Rashedi requested to stay with Integrys and be removed from the Constellation SCO. At the customer’s request, the account was re-enrolled with Integrys.

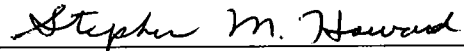
18. On 4/1/2015, Integrys Energy Services – Natural Gas, Inc. was acquired by Constellation and the entity name was changed to Constellation Energy Services – Natural Gas, Inc.

19. On 3/16/2016, Constellation Energy Services – Natural Gas, Inc. (f/k/a Integrys) completed a request to drop service for utility account number XXXXXX, at Mr. Rashedi's request. Constellation's response to the PUCO was provided on 3/29/2016.

20. On 4/3/2016, Constellation Energy Services – Natural Gas, Inc. received an inbound enrollment request from Columbia Gas for utility account number XXXXXX to be enrolled as part of an SCO, where Constellation Energy Services – Natural Gas, Inc. was awarded the auction. As with these SCO auctions, Constellation Energy Services – Natural Gas, Inc. does not have the ability to drop the enrollment and the customer may only do so by contacting Columbia Gas directly.

21. While Constellation believes it acted in good faith, as a courtesy, it will re-rate the customer's bill from 10/1/2013, which would have been the effective drop date from when Constellation was first notified of the move on 9/30/2013, to the last period of service on 5/1/2014, when the drop was completed and had been requested. Constellation will be sending a refund check to Mr. Rashedi by mail in the next two weeks. Constellation submits that with the receipt of this check, this Complaint should be considered resolved and settled. Pursuant to a Commission rule, the complainant has 20 days to file a written response agreeing or disagreeing with the assertion that this Complaint will have been settled and that, if no response is filed, the Commission may presume that satisfaction or settlement has occurred and dismiss the Complaint.

Respectfully submitted,



Stephen M. Howard
Vorys, Sater, Seymour and Pease LLP
52 E. Gay Street
P.O. Box 1008
Columbus, OH 43216-1008
614-464-5401
smhoward@vorys.com

Attorney for Constellation Energy Services -
Natural Gas, Inc. LLC

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing document was served this 12th day of May, 2016,
via U.S. mail on John and Kelly Rashedi, 39406 Evergreen Drive, Avon, Ohio 44011.

Stephen M. Howard

Stephen M. Howard

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

5/12/2016 1:31:29 PM

in

Case No(s). 16-0718-GA-CSS

Summary: Answer PUBLIC VERSION of Answer electronically filed by Mr. Stephen M Howard on behalf of Constellation Energy Services - Natural Gas, Inc.