

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

VERONICA WHITE,)	
)	
Complainant,)	
)	
v.)	Case No. 16-1887-EL-CSS
)	
THE CLEVELAND ELECTRIC)	
ILLUMINATING COMPANY,)	
)	
Respondent.)	
)	

ANSWER OF THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

The Cleveland Electric Illuminating Company (“CEI”) is a public utility as defined by § 4905.03(C) of the Ohio Revised Code, and is duly organized and existing under the laws of the State of Ohio. The Complaint of Veronica White (“Complainant”) consists of ten (10) unnumbered pages. CEI will attempt to specifically answer each allegation in the Complaint. To the extent CEI does not respond to a specific allegation, CEI denies any such allegation.

Therefore, in accordance with Rule 4901-9-01(D) of the Ohio Administrative Code, Respondent CEI for its answer to the Complaint states:

FIRST DEFENSE

1. As to the allegations contained on the first unnumbered page of the Complaint, CEI admits that Complainant had service at 16218 Maple Heights Boulevard, Apt. 305, Maple Heights, Ohio, from March 6, 1996 through June 12, 2016. CEI further admits that Complainant is currently receiving service at 4907 E. 107th Street, Garfield Heights, Ohio 44125. CEI denies that Complainant was “not on PIPP” while receiving service at 16218 Maple Heights Boulevard, Apt. 305, Maple Heights, Ohio. CEI also admits that the transfer at issue for \$216.66 is a deferred arrears balance. CEI admits that Complainant was on PIPP for a brief period at 4907 E.

107th Street, Garfield Heights, Ohio 44125, and was removed from the PIPP program at the Complainant's request. CEI denies that any amount of the deferred arrears balance is from Complainant's time on PIPP while receiving service at 4907 E. 107th Street, Garfield Heights, Ohio 44125. CEI lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained on the first unnumbered page of the Complaint.

2. CEI states that the documents attached to the Complaint, comprising unnumbered pages two through four, speak for themselves and, as such, require no response.

3. CEI denies any allegations contained on the fifth unnumbered page of the Complaint.

4. CEI states that the remaining documents attached to the Complaint, comprising unnumbered pages six through ten, speak for themselves and, as such, require no response.

5. CEI denies any remaining allegations contained in the Complaint.

SECOND DEFENSE

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

THIRD DEFENSE

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

FOURTH DEFENSE

8. CEI 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 Tariff, PUCO No. 13, on file with the Public Utilities Commission of Ohio. These statutes, rules, regulations, orders, and tariff provisions bar Complainant's claims.

FIFTH DEFENSE

9. CEI reserves the right to supplement its answer with other defenses, including affirmative defenses, as discovery progresses in this matter.

WHEREFORE, CEI requests an order dismissing the Complaint and granting CEI any other relief deemed necessary and proper.

Respectfully submitted,

/s/ Erika Ostrowski

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On Behalf of The Cleveland Electric
Illuminating Company

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Answer of The Cleveland Electric Illuminating Company was served by U.S. mail upon the following this 4th day of October, 2016.

Veronica White
4907 E. 107
Garfield Heights, Ohio 44125

/s/ Erika Ostrowski
Attorney for The Cleveland Electric
Illuminating Company

This foregoing document was electronically filed with the Public Utilities

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in

Case No(s). 16-1887-EL-CSS

Summary: Answer of The Cleveland Electric Illuminating Company electronically filed by Ms. Erika Ostrowski on behalf of The Cleveland Electric Illuminating Company