

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

CAMPBELL, et al.)	
)	
Complainant,)	
)	
v.)	Case No. 17-0520-EL-CSS
)	
OHIO EDISON COMPANY,)	
)	
Respondent.)	
)	

ANSWER OF OHIO EDISON COMPANY

Ohio Edison Company (“Ohio Edison” or “Company”) 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 Jack Campbell, Jeff Campbell, and Jeff Campbell, Jr. (collectively, “Complainant”) consists of two (2) cover pages, two (2) unnumbered pages, three (3) attachments, and a “summary.” Ohio Edison will attempt to specifically answer each allegation. To the extent Ohio Edison does not respond to a specific allegation, Ohio Edison denies any such allegation.

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

FIRST DEFENSE

1. Ohio Edison states that the two (2) cover pages of the Complaint speak for themselves and, therefore, require no response. To the extent a response is required, Ohio Edison denies any allegations.
2. As to the allegations contained in the first unnumbered paragraph on the first unnumbered page of the Complaint, Ohio Edison can neither confirm nor deny the identity of

any prior account holder as to do so would require the disclosure of confidential customer information. Ohio Edison lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations contained in the first unnumbered paragraph on the first unnumbered page of the Complaint and therefore denies same.

3. As to the allegations contained in the second unnumbered paragraph on the first unnumbered page of the Complaint, Ohio Edison admits that Jack Campbell was established as the customer of record for Account No. 110113332024 in October 2015. Ohio Edison denies that a phone call was received from Complainant in July 2016 regarding Account No. 110113332024. Ohio Edison lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations contained in the second unnumbered paragraph on the first unnumbered page of the Complaint and therefore denies same.

4. As to the allegations contained in the third unnumbered paragraph on the first unnumbered page of the Complaint, Ohio Edison admits that Complainant has contacted the Company regarding his electric service for Account No. 110113332024. Ohio Edison lacks sufficient knowledge or information to form a belief as to the truth of any remaining allegations contained in the third unnumbered paragraph on the first unnumbered page of the Complaint and therefore denies same.

5. As to the allegations contained in the fourth unnumbered paragraph on the first unnumbered page of the Complaint, Ohio Edison admits that Complainant has contacted the Company regarding his electric service for Account No. 110113332024. Ohio Edison lacks sufficient knowledge or information to form a belief as to the truth of any remaining allegations contained in the fourth unnumbered paragraph on the first unnumbered page of the Complaint and therefore denies same.

6. As to the allegations contained in the fifth unnumbered paragraph on the first unnumbered page of the Complaint, Ohio Edison admits that Complainant has contacted the Company regarding his electric service for Account No. 110113332024. Ohio Edison lacks sufficient knowledge or information to form a belief as to the truth of any remaining allegations contained in the fifth unnumbered paragraph on the first unnumbered page of the Complaint and therefore denies same.

7. As to the allegations contained in the sixth unnumbered paragraph on the first unnumbered page of the Complaint, Ohio Edison denies that Complainant “paid approximately \$28,000 to \$42,000 more than [Complainant] should have.” Ohio Edison lacks sufficient knowledge or information to form a belief as to the truth of any remaining allegations contained in the sixth unnumbered paragraph on the first unnumbered page of the Complaint and therefore denies same.

8. Ohio Edison denies all allegations contained in the first unnumbered paragraph on the second unnumbered page of the Complaint.

9. Ohio Edison denies all allegations contained in the second unnumbered paragraph on the second unnumbered page of the Complaint.

10. Ohio Edison denies all allegations contained on the cover page of Attachment #1 to the Complaint. As to the remainder of Attachment #1, Ohio Edison states that these documents speak for themselves and, therefore, require no response. To the extent a response is required, Ohio Edison denies any allegations.

11. Ohio Edison denies all allegations contained on the cover page of Attachment #2 to the Complaint. As to the remainder of Attachment #2, Ohio Edison states that these

documents speak for themselves and, therefore, require no response. To the extent a response is required, Ohio Edison denies any allegations.

12. Ohio Edison denies all allegations contained on the cover page of Attachment #3 to the Complaint. As to the remainder of Attachment #3, Ohio Edison states that these documents speak for themselves and, therefore, no response is required. To the extent a response is required, Ohio Edison denies any allegations.

13. Ohio Edison denies all allegations contained in the “summary” attached to the Complaint.

14. Ohio Edison denies any remaining allegations contained in the Complaint.

SECOND DEFENSE

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

THIRD DEFENSE

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

FOURTH DEFENSE

17. Ohio Edison 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. 11, on file with the Public Utilities Commission of Ohio. These statutes, rules, regulations, orders, and tariff provisions bar Complainant’s claims.

FIFTH DEFENSE

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

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

Date: March 13, 2017

Respectfully submitted,

/s/ Joshua R. Eckert

Joshua R. Eckert (#0095715)

Counsel of Record

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On behalf of Ohio Edison Company

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Answer of Ohio Edison Company has been served upon the following by U.S. mail on this 13th day of March, 2017.

Jack Campbell, et al.
435 E. Haskell St.
Loudonville, Ohio 44842

/s/ Joshua R. Eckert
Attorney for Ohio Edison Company

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

3/13/2017 12:55:53 PM

in

Case No(s). 17-0520-EL-CSS

Summary: Answer of Ohio Edison Company electronically filed by Mr. Joshua R. Eckert on behalf of Ohio Edison Company