

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

Kenneth B. Logan,)	
)	
Complainant,)	
)	
v.)	Case No. 17-1943-EL-CSS
)	
Ohio Power Company,)	
)	
Respondent.)	

ANSWER OF RESPONDENT OHIO POWER COMPANY

Pursuant to Rule 4901-9-01(B) of the Ohio Administrative Code, Respondent Ohio Power Company (“AEP Ohio”)¹ hereby files its Answer and responds to the allegations contained in Complainant Kenneth B. Logan’s September 6, 2017 Complaint as follows:

ANSWER TO ALLEGATIONS

1. In response to the first unnumbered paragraph of the Complaint, AEP Ohio denies that it violated Complainant’s legal rights, the law, or any statute or regulation. AEP Ohio denies the remaining allegations and averments contained in the first unnumbered paragraph of the Complaint for lack of information or knowledge sufficient to form a belief thereon.

2. In response to the second unnumbered paragraph of the Complaint, AEP Ohio denies that it has “started [an] assault on” Complainant and denies that Complainants has always timely paid amounts due for his electric usage. AEP Ohio denies the remaining allegations and averments contained in the second unnumbered paragraph of the Complaint for lack of information or knowledge sufficient to form a belief thereon.

¹ The Complaint names “AEP” as the Respondent; however, Ohio Power Company is the appropriate Respondent.

3. In response to the third unnumbered paragraph of the Complaint, AEP Ohio denies that misread or misinterpreted Complainant's meter. AEP Ohio denies the remaining allegations and averments contained in the third unnumbered paragraph of the Complaint for lack of information or knowledge sufficient to form a belief thereon.

4. In response to the fourth unnumbered paragraph of the Complaint, AEP Ohio denies that it charged Complainant for any unnecessary service or disconnection notice. AEP Ohio denies the remaining allegations and averments contained in the fourth unnumbered paragraph of the Complaint for lack of information or knowledge sufficient to form a belief thereon.

5. AEP Ohio denies the allegations and averments contained in the fifth unnumbered paragraph of the Complaint.

6. AEP Ohio denies the allegations and averments contained in the sixth unnumbered paragraph of the Complaint for lack of information or knowledge sufficient to form a belief thereon.

AFFIRMATIVE DEFENSES

1. AEP Ohio avers that Complainant has failed to state reasonable grounds for complaint as required by R.C. 4905.26.

2. AEP Ohio avers that it has complied with all applicable Ohio statutes, the Commission's rules and regulations, and AEP Ohio's tariff.

3. AEP Ohio provided reasonable and adequate service to Complainant at all times relevant.

4. AEP Ohio reserves the right to raise other defenses as warranted as this matter proceeds.

WHEREFORE, having fully answered, Respondent Ohio Power Company respectfully requests that the Public Utilities Commission of Ohio dismiss Complainant Kenneth B. Logan's Complaint.

Respectfully submitted,

/s/ Christen M. Blend

Christen M. Blend (0086881)

American Electric Power Service Corporation

1 Riverside Plaza, 29th Floor

Columbus, Ohio 43215

Telephone: (614) 716-1915

Facsimile: (614) 716-2950

E-mail: cmbblend@aep.com

(willing to accept service by e-mail)

Counsel for Respondent

CERTIFICATE OF SERVICE

The undersigned certifies that a true and accurate copy of the foregoing was served upon
Complainants at the address listed below by regular U.S. mail, postage, prepaid, on this 26th day
of September, 2017.

Kenneth B. Logan
2489 Edsel Avenue
Columbus, Ohio 43207

/s/ Christen M. Blend
Christen M. Blend

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

9/26/2017 3:19:32 PM

in

Case No(s). 17-1943-EL-CSS

Summary: Answer - Answer of Respondent Ohio Power Company electronically filed by Ms. Christen M. Blend on behalf of Ohio Power Company