

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

Barbara Parsons,

Complainant,

v.

Ohio Power Company,

Respondent.

Case No. 19-182-EL-CSS

ANSWER OF RESPONDENT OHIO POWER COMPANY

Pursuant to Rule 4901-9-01(B) of the Ohio Administrative Code, Ohio Power Company (“AEP Ohio” or the “Company”) hereby responds as follows to the allegations contained in the Complaint that Complainant Barbara Parsons filed in this proceeding on January 28, 2019:

ANSWER TO ALLEGATIONS

1. AEP Ohio admits that Complainant is a customer of AEP Ohio.
2. AEP Ohio admits that the Company’s customers have the option to decline the installation of an advanced metering infrastructure (“AMI”) meter at their residence. AEP Ohio admits that its customers are required to pay the Company’s Commission-approved opt-out fee in lieu of having an AMI meter installed on their property. AEP Ohio admits that its Commission-approved opt-out fee is \$24.00 per month.
3. AEP Ohio admits that the Company sent Complainant an AMI Opt Out Customer Acknowledgment (“Acknowledgment”) after Complainant informed the Company of her desire not to have an AMI meter installed at her residence. AEP Ohio admits that Complainant signed and returned the Acknowledgment.

4. AEP Ohio admits that Complainant and her son had conversations with Adam Marcum. AEP Ohio denies Complainant's characterization of those conversations in her Complaint.
5. AEP Ohio denies Complainant's allegation that the Company is refusing to allow the Complainant to opt out of having an AMI meter installed at her residence.
6. AEP Ohio denies that Complainant has the right to keep an analog meter in lieu of an AMI meter. Further, AEP Ohio denies that any AEP Ohio employee informed Complainant that she would be allowed to retain her analog meter.
7. AEP Ohio denies Complainant's assertion that the Company's digital non-emitting meters do not meet the definition of a traditional meter as defined in Ohio Adm. Code 4901:1-10-01(FF).
8. AEP Ohio denies that the Company has violated any law with respect to the allegations in Complainant's Complaint. AEP Ohio further denies that the Company has "ignored [Complainant's opt out] request."
9. AEP Ohio denies that its AMI or digital non-emitting meters emit "dirty electricity" or otherwise present any health hazard to its customers.
10. AEP Ohio denies Complainant's assertions related to her son's "negative health effect[s]" for lack of information and knowledge to form a belief thereon.
11. AEP Ohio denies each and every remaining allegation set forth in the Complaint.

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, at all times, complied with all applicable Ohio statutes; the Commission's rules, regulations, and orders; 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 additional affirmative defenses as warranted as this matter proceeds.

WHEREFORE, having fully responded to the Complaint, Respondent Ohio Power Company respectfully requests that the Public Utilities Commission of Ohio dismiss the Complaint with prejudice and grant the Company all other necessary and proper relief.

Respectfully submitted,

/s/ Tanner S. Wolffram

Christen M. Blend (0086881), Counsel of Record

Tanner S. Wolffram (0097789)

American Electric Power Service Corporation

1 Riverside Plaza, 29th Floor

Columbus, Ohio 43215

Telephone: (614) 716-1915

Facsimile: (614) 716-2950

E-mail: cblend@aep.com

tswolffram@aep.com

(willing to accept service by e-mail)

**Counsel for Respondent
Ohio Power Company**

CERTIFICATE OF SERVICE

The undersigned certifies that a true and accurate copy of the foregoing was served upon Complainant at the address listed below by regular U.S. mail, postage prepaid, on this 13th day of February, 2019.

Barbara Parsons
1253 Marsdale Ave
Columbus, Ohio 43223

Complainant

/s/ Tanner S. Wolfram
Tanner S. Wolfram

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Summary: Answer - Answer of Respondent Ohio Power Company electronically filed by
Tanner Wolfram on behalf of Ohio Power Company