## BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

Jed Johnson	)	
Complainant,	)	Case No. 19-372-EL-CSS
v.	)	Cusc 1(0. 1) 3/2 HE CSE
OHIO EDISON COMPANY	)	
Respondent.	)	

## ANSWER OF THE OHIO EDISON COMPANY

The Ohio Edison Company ("Ohio Edison") is a public utility company 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. In accordance with Rule 4901-9-01(D), Ohio Administrative Code, the Respondent, Ohio Edison Company for its answer to the Complaint of Jed Johnson ("Complainant") states:

Complainant's Complaint consists of random facts. To the extent that an allegation is not specifically addressed below, it is hereby denied.

- 1. Ohio Edison has no firsthand knowledge the Complainant was experiencing flickering electricity and as a result, the same is denied.
- 2. Ohio Edison admits Complainant contacted Ohio Edison.
- 3. Ohio Edison admits that a trouble man was sent to Complainant's residence.
- 4. Ohio Edison admits it tested Ohio Edison equipment, including checking connections on Complainant's meter and found no issues.
- 5. Ohio Edison has no firsthand knowledge of whether the power flickering ceased, and as a result, the same is denied.

- 6. Ohio Edison denies all claims related to Complainant's furnace and bedroom stereo.
- 7. Ohio Edison denies that Ohio Edison equipment was neglected.

## **AFFIRMATIVE DEFENSES**

- 8. The Complaint fails to set forth reasonable grounds for Complaint, as required by Section 4905.26, Revised Code.
- 9. The Complaint fails to state a claim upon which relief can be granted.
- The Commission lacks subject matter jurisdiction over some or all of Complainant's claims.
- 11. Ohio Edison reserves the right to raise other defenses as warranted by discovery in this matter.

WHEREFORE, Ohio Edison respectfully requests an Order dismissing the Complaint and granting Ohio Edison all other necessary and proper relief.

Respectfully submitted

/s/ Scott J. Casto
Scott J. Casto (0085756)
Counsel of Record
FIRSTENERGY SERVICE COMPANY
76 South Main Street
Akron, OH 44308
(330) 761-7835
scasto@firstenergycorp.com

Attorney for Ohio Edison Company

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Answer was served by U.S. mail to the following person on this  $25^{th}$  day of February 2018.

Jed Johnson 2903 Little Darby Rd. London, OH 43140

> /s/ Scott J. Casto Attorney for Ohio Edison Company

This foregoing document was electronically filed with the Public Utilities

**Commission of Ohio Docketing Information System on** 

2/25/2019 11:52:12 AM

in

Case No(s). 19-0372-EL-CSS

Summary: Answer electronically filed by Mr. Scott J Casto on behalf of The Ohio Edison Company