

FILE

March 13, 2020

David Steehler  
Russella Steehler  
PO Box 37  
Jeffersonville, OH 43128

Public Utilities Commission  
180 E. Broad St.  
Columbus, OH 43215-3793

RE: Case No. 20779-GA-CSS

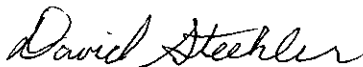
Enclosed is a detailed reply to Vectren's answers to our formal complaint.

We reply to each numbered item with the same numbers they used in their defense.

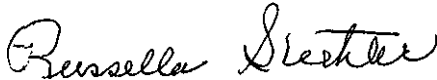
A photo for your file is also enclosed showing the flooded lot of our property due to the broken tiles.

This should provide the clarity Vectren claimed was lacking in our formal complaint.

Sincerely,



David Steehler



Russella Steehler

PUCO

2020 MAY 29 PM 3:38

This is to certify that the images appearing are an  
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*March 13, 2020*

David & Russella Steehler  
13038 State Route 729, Jeffersonville, OH 43128  
Complainants

RE: Case No. 20779-GA-CSS

Complainants response to VEDO answers to the formal complaint

**First Defense**

1. Mr. Steehler, Russella Steehler's spouse, has lived at the above address in question for twenty-three (23) years with his wife as co-applicant of the account and co-owner of the property. VEDO took over the account, did not offer an updated application and negligently removed the co-applicant's name from the Dayton Power and Light Application when the utility was transferred years ago. VEDO's claim that Mr. Steehler is not a co-applicant or authorized used is false.
2. Sometime after October 1, 2019, KS Energy installed a gas mainline along State Route 729 adjacent to the premises of the complainants. This was done on State right of way land in Jefferson Township. VEDO failed to get a state permit for this operation.
3. There is no lateral sewer that services Jeffersonville adjacent to the premises. It is a block away. The premises have a septic system and no city sewer involvement. The concern Mr. Steehler complained about was a drainage tile in state right of way that ran along the side lot next to the state highway, continued beneath the driveway and in front of the house.
4. At the end of April 2020, the Fayette County Health Department inspected the premises and septic system. They found no involvement with the line or septic tank. They concluded the system operated properly and no sewer drainage or pooling was found. The excavation VEDO (KS Energy) did was not near the septic tank as claimed.
5. The gas main damaged tiles along the highway and underneath the road. There was also damage to a drainage tile connected to the basement drains on the premises. Village officials have no jurisdiction in the township and there is no record of their agreeing with KS Energy. They dealt with KS Energy in repairing village damage to the sewers et al.
6. No notice was given to any operation KS Energy did Jan 24, 2020. No one was informed about this and no results reported. It was done in a driving rain storm, and borderline freezing conditions. The tile had been broken during installation of the gas line long before January 23 or 24. Evidence of this was water spurting up along the state right of way grass.
7. KS Energy contacted the village mayor about whether to fill-in the hole they dug. The mayor (who has no jurisdiction) asked the complainant about the matter. We requested no backfill. No contact was made with the complainant from KS Energy directly.

8. There was no pooling of drainage water in front of the premises until after the gas main was installed.
9. The side lot after 5 or 6 inches of heavy rain would pool slightly and drain away quickly. After the gas main was installed it blocked drainage (see three photos enclosed).
10. See response #4 re: Fayette County Health Department inspection. No septic involvement.
11. Phone calls were made to VEDO, township trustees, county commissioners and PUCO. No phone calls were returned except by the PUCO who took ~~and~~ interest and said the phone call would preclude a formal complaint. No contact was made by VEDO until April 2020 by phone for information.
12. See response #11
13. See response #11

#### **Second Defense**

14. As stated above (11-13) no contact was made by VEDO for over 90 days to get any information whatsoever.

#### **Third Defense**

15. Both the formal complaint and this response to their answers amount to reasonable grounds.

#### **Fourth Defense**

16. Repair of broken tiles to drain water should be the claim for relief.

#### **Fifth Defense**

17. VEDO operated installation of the pipeline adjacent to complainant's property without state permits to do so.

