

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

Ed Luu,)	
)	
Complainant,)	
)	
v.)	Case No. 20-1407-EL-CSS
)	
Ohio Power Company,)	
)	
Respondent.)	

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 Ed Luu filed in this proceeding on August 19, 2020:

ANSWER TO ALLEGATIONS

1. AEP Ohio admits that Complainant is a customer of AEP Ohio.
2. AEP Ohio admits that it investigated a property damage claim related to a fire at 228 E. Seventh Ave., Columbus, Ohio 43201 (the “Service Address”) that occurred on July 19, 2020. AEP Ohio further admits that, consistent with the Terms and Conditions of Service in the Company’s Commission-approved tariff, it denied Complainant’s property damage claim as the identified cause of the fire was the failure of Complainant’s electrical equipment.
3. AEP Ohio denies Complainant’s assertion that the Company’s meter installed at the Service Address “exploded”. AEP Ohio further denies that the cause of the fire was the Company’s meter or any other Company-owned equipment installed at the Service Address.
4. 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 a 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. The Commission lacks subject matter jurisdiction to award damages and, as such, lacks subject matter jurisdiction to grant the requested relief.
4. AEP Ohio provided reasonable and adequate service to Complainant at all times relevant.
5. 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)

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**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 3rd day of September, 2020.

Ed Luu
228 E. Seventh Ave.
Columbus, Ohio 43201

Complainant

/s/ Tanner S. Wolfram
Tanner S. Wolfram

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in

Case No(s). 20-1407-EL-CSS

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