

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

David Williams)	
)	
Complainant,)	
)	Case No. 20-1566-EL-CSS
v.)	
)	
Ohio Edison Company)	
)	
Respondent.)	
)	

ANSWER OF OHIO EDISON COMPANY

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) of the Ohio Administrative Code, Ohio Edison for its answer to the Complaint of Terry L. Belt (the “Complainant”) states:

Complainant’s Complaint consists of various assertions in one unnumbered paragraph, and one typed page of what appears to be regulatory law. To the extent Ohio Edison does not respond to a specific allegation, Ohio Edison denies any such allegation. Ohio Edison reserves the right to supplement or amend this Answer.

1. Ohio Edison admits that service for both referenced accounts was placed in Complainant’s name due to shared metering.
2. Ohio Edison lacks knowledge or information sufficient to respond to the allegation that Complainant “fixed the problem” and therefore denies the same.
3. Ohio Edison denies that it “refuses” to “verify” the work that Complainant alleges he has done on his property, and avers that Ohio Edison has informed Complainant that due to Covid-19 Ohio Edison is unable to go inside the premises to investigate

whether the shared metering has been corrected. Ohio Edison further avers that a work order to perform this investigation is pending, and once Ohio Edison can safely confirm the shared meter has been corrected, Ohio Edison will place service back into the tenant's name, effective 7/2/20, when Complainant reported the correction to the shared metering.

AFFIRMATIVE DEFENSES

1. The Complaint fails to set forth reasonable grounds for Complaint, as required by Section 4905.26, Revised Code.
2. The Complaint fails to state a claim upon which relief can be granted.
3. The Commission lacks subject matter jurisdiction over some or all of Complainant's claims.
4. 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/ Emily V. Danford
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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 16th day of November 2020:

David Williams
427 Linden Ave.
Springfield, Ohio 45505

/s/ Emily V. Danford
Attorney for Ohio Edison Company

This foregoing document was electronically filed with the Public Utilities

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in

Case No(s). 20-1566-EL-CSS

Summary: Answer electronically filed by Ms. Emily V Danford on behalf of Ohio Edison Company