

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

Sherman C. Green)	
)	Case No. 23-1078-EL-CSS
Complainant,)	
)	
v.)	
)	
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 Amended Complaint that Complainant, Sherman C. Green, filed in this proceeding on November 28, 2023:

ANSWER TO ALLEGATIONS

1. AEP Ohio admits that Complainant contacted AEP Ohio on November 8, 2023, to inquire about removal of branches near an electric service line associated with the property at 784 Carpenter St., Columbus, Ohio 43206.
2. AEP Ohio denies or is without sufficient knowledge to ascertain the veracity of the remaining allegations as described in the Complaint and therefore denies the same.

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. The Complainant fails to state a claim upon which relief can be granted.

3. AEP Ohio, at all times, complied with all applicable Ohio statutes; the Commission's rules, regulations, and orders; and AEP Ohio's tariffs.
4. The Complainant's claims are time-barred.
5. The PUCO lacks jurisdiction over this claim.
6. 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/ Michael J. Schuler
Michael J. Schuler (0082390)
American Electric Power Service
Corporation
1 Riverside Plaza, 29th Floor
Columbus, Ohio 43215
Telephone: (614) 716-2928
E-mail: mjschuler@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 18th day of December, 2023.

Sherman C. Green
784 Carpenter St.
Columbus, Ohio 43206

/s/ Michael J. Schuler
Michael J. Schuler (0082390)

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in

Case No(s). 23-1078-EL-CSS

Summary: Answer Answer electronically filed by Mr. Michael J. Schuler on behalf of
Ohio Power Company.