**BEFORE**

**THE PUBLIC UTILITIES COMMISSION OF OHIO**

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| In the Matter of the Complaint  of Connie Cross  Complainant,  v.  Columbia Gas of Ohio, Inc.  Respondent. | )  )  )  )  )  )  )  ) | Case No. 12-3232-GA-CSS |

**ANSWER**

**OF COLUMBIA GAS OF OHIO, INC.**

Now comes the Respondent, Columbia Gas of Ohio, Inc. (“Columbia”), and files its Answer to the Complaint filed herein on December 18, 2012.

1. Columbia admits that on May 31, 2012, it interrupted gas service to 13 of the residents of the Graystone Woods development after detecting unsafe levels of methane gas.
2. Columbia is without sufficient knowledge to admit or deny why Complainant moved to her home in the Graystone Woods development.
3. Columbia admits that it would be unsafe to restore natural gas service to the Complainant’s residence because of the existence of stray methane gas from a source as yet unidentified.
4. Columbia admits that Columbia personnel have tested the site for the presence of stray gas, as has Hull and Associates, an independent contractor agreed upon by both Columbia and the builder of the Graystone Woods development. Columbia further avers that this testing has been done several times, producing varied levels of gas, sometimes at levels as high as 27%. Columbia has found levels at Complainant’s house as high as 8%.
5. Columbia is without sufficient knowledge to admit or deny the number of years Complainant’s neighbors have lived on Oak Haven Rd.
6. Columbia affirmatively denies that it has discriminated against the Complainant or any other resident on Oakside Rd.
7. Columbia is without sufficient knowledge to either admit or deny the remaining statements in the Complaint.
8. Any allegation not expressly admitted herein is denied.

**Affirmative Defenses**

1. Columbia avers that the Complaint does not comply with the Commission’s rules requiring a “statement which clearly explains the facts.” Ohio Adm. Code 4901-9-01(B). The Complaint is not in numbered paragraph form and contains numerous opinions and questions rather than specific allegations. As such, Columbia has been left to speculate on the meaning of the Complaint in order to respond to the allegations as required. Columbia reserves the right to amend its Answer in the event that it has incorrectly understood the allegations in the Complaint.
2. Columbia avers that the Complainant has failed to state reasonable grounds for a complaint against Columbia as required by Ohio Revised Code § 4905.26.
3. Columbia avers that it has complied with all applicable Ohio statutes, the Commission’s rules and regulations and Columbia’s tariff.
4. Columbia reserves the right to raise other defenses as warranted by discovery in this matter.

Respectfully Submitted by,

**COLUMBIA GAS OF OHIO, INC.**

**/s/ Brooke E. Leslie \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

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**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing *Answer of Columbia Gas of Ohio, Inc.,* by ordinary U.S. mail, postage prepaid, to Connie Cross, 2035 Oakside Road, Toledo, Ohio 43615 on this 7th day of January 2013.

**/s/ Brooke E. Leslie \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

Brooke E. Leslie

**Attorney for**

**COLUMBIA GAS OF OHIO, INC.**