**BEFORE**

**THE PUBLIC UTILITIES COMMISSION OF OHIO**

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| GLORIA DICKSON,  Complainant,  v.  THE EAST OHIO GAS COMPANY D/B/A DOMINION EAST OHIO,  Respondent. | )  ) )  )  )  )  )  )  )  ) | Case No. 12-2111-GA-CSS |

**ANSWER**

Pursuant to Ohio Adm. Code 4901-9-01(D), the Respondent, The East Ohio Gas Company d/b/a Dominion East Ohio (“DEO” or the “Company”), for its answer to the complaint of Gloria Dickson states:

**FIRST DEFENSE**

1. DEO denies that it violated R.C. 4933.12 when it disconnected Ms. Dickson’s gas on December 3, 2011. DEO further denies that it disconnected Ms. Dickson’s gas “for no valid reason.”
2. DEO is without sufficient knowledge or information to admit or deny the allegations concerning Ms. Dickson’s age.
3. DEO admits that at the time of disconnection, Ms. Dickson was current on her gas service. DEO further avers that it did not disconnect Ms. Dickson’s gas service for nonpayment.
4. Ms. Dickson attempts to state a legal conclusion concerning R.C. 4933.12 and notices it requires, to which no response is required. To the extent that a response is deemed necessary, the allegations are denied.
5. DEO admits that it left a disconnection notice at Ms. Dickson’s property on December 3, 2011.
6. DEO denies that there were not any safety or hazardous problems at Ms. Dickson’s premises. DEO further avers that Ms. Dickson’s meter required replacement due to its age and condition.
7. DEO is without sufficient knowledge or information to admit or deny the allegation that the “[h]ouse was not vacant.”
8. DEO denies that the excerpt of R.C. 4905.26 is both in effect and applicable to Ms. Dickson’s complaint.
9. DEO is without sufficient knowledge or information to admit or deny that that the correspondence attached to Ms. Dickson’s complaint was sent to the Public Utilities Commission of Ohio.
10. DEO admits that Ms. Dickson was current paying on her natural gas service at the time of her disconnection.
11. DEO denies that it did not have a valid reason to disconnect Ms. Dickson’s gas service.
12. DEO denies that Ms. Dickson is entitled to be reimbursed for the costs of staying in a motel and purchasing electric appliances.
13. DEO denies generally any allegations not specifically admitted or denied in this Answer, pursuant to Ohio Adm. Code 4901-9-01(D).

**AFFIRMATIVE DEFENSES**

**SECOND DEFENSE**

1. 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). DEO has attempted, to the best of its ability, to answer all of the allegations, but reserves the right to amend its answers in the event it has incorrectly understood them.

**THIRD DEFENSE**

1. The complaint does not contain “a statement of relief sought,” as required by Ohio Adm. Code 4901-9-01(B), since Ms. Dickson cannot request monetary damages to be awarded in this proceeding.

**FOURTH DEFENSE**

1. The complaint fails to set forth reasonable grounds for complaint, as required by R.C. 4905.26.

**FIFTH DEFENSE**

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

**SIXTH DEFENSE**

1. DEO at all times complied with Ohio Revised Code Title 49; the applicable rules, regulations, and order of the Public Utilities Commission of Ohio; and DEO’s tariffs. These statutes, rules, regulations, orders, and tariff provisions bar Ms. Dickson’s claims.

**SEVENTH DEFENSE**

1. DEO reserves the right to raise other defenses as warranted by discovery in this matter.

WHEREFORE, DEO respectfully requests an Order dismissing the complaint and granting DEO all other necessary and proper relief.

Respectfully submitted,

/s/ Andrew J. Campbell

Mark A. Whitt (Counsel of Record)

Andrew J. Campbell

WHITT STURTEVANT LLP

PNC Plaza, Suite 2020

155 East Board Street

Columbus, Ohio 43215

Telephone: (614) 224-3911

Facsimile: (614) 224-3960

whitt@whitt-sturtevant.com

campbell@whitt-sturtevant.com

ATTORNEYS FOR THE EAST OHIO GAS COMPANY D/B/A DOMINION EAST OHIO

**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 8th day of August, 2012:

Gloria Dickson

23519 David Drive

North Olmsted, Ohio 44070

/s/ Andrew J. Campbell

One of the Attorneys for The East Ohio Gas Company d/b/a Dominion East Ohio