**BEFORE**

**THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Complaint of )

Stand Energy Corporation, )

)

Complainant, )

)

vs. ) Case No. 16-1037-TP-CSS

)

Windstream Ohio, LLC, et al. )

)

Respondents. )

ANSWER OF RESPONDENTS

TO THE COMPLAINT OF

COMPLAINANT STAND ENERGY CORPORATION

Now come Respondents Windstream Ohio, LLC, Windstream Nuvox Ohio, LLC and Windstream Communications, LLC (collectively, "Windstream") and for their Answer to the Complaint of Complainant Stand Energy Corporation ("Stand Energy") state as follows:

First Defense

1. In response to paragraph 1 of the Complaint, Windstream admits that Stand Energy has an office located at 1077 Celestial Street, Suite 110, Cincinnati, Ohio 45202-1629, but denies the remaining allegations contained in paragraph 1 for lack of knowledge.
2. Windstream admits the allegations contained in paragraphs 2 to 7 of the Complaint.
3. Windstream denies the allegations contained in paragraph 8 of the Complaint.
4. In response to the allegations in paragraphs 9 to 19, Windstream admits that Stand Energy has attached certain documents to the Complaint, but denies the remainder of the allegations.
5. Windstream denies the allegations contained in paragraphs 20 to 24 of the Complaint.
6. Windstream denies all allegations not explicitly admitted herein.

Second Defense

1. Windstream has breached no legal duty owing to Stand Energy, and Windstream’s services and practices at all relevant times have been in full accordance with the applicable provisions of law and accepted standards within the telephone industry.

Third Defense

1. Windstream previously satisfied the Complaint by crediting Stand Energy’s unpaid balance.

WHEREFORE, Windstream respectfully requests that the Commission dismiss the Complaint and grant all other necessary and further relief to which Windstream is entitled.

Respectfully submitted,

/s/*William A. Adams*

William A. Adams, Counsel of Record

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*Attorneys for Respondents,*

*Windstream Ohio, LLC, Windstream Nuvox Ohio, LLC, and Windstream Communications, LLC*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true copy of the foregoing *Answer of Respondents to the Complaint of Complainant Stand Energy Corporation* will be automatically served via electronic mail through the E-Filing System of the Public Utilities Commission of Ohio this 6th day of July, 2016, upon:

Kate E. Russell-Bedinghaus

Stand Energy Corporation

1077 Celestial Street, Suite 110

Cincinnati, OH 45202-1629

*Attorney for Complainant*

/s/*William A. Adams*

William A. Adams, Counsel of Record