

FILE

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

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PUCO

Erica Russell-Averette
Complainant,

vs.

Columbia Gas of Ohio, Inc.
Respondent.

Case No. 09-1997-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 29, 2009.

1. Columbia admits that Complainant ordered a disconnect for October 5, 2009 at 675 Linwood Avenue, Columbus, Ohio 43205. Columbia further avers that such disconnect did not occur because it did not have access inside the building and a curb shut-off was impossible due to a foreign object being jammed in the curb box.

2. Columbia denies that a disconnect was scheduled for October 20, 2009.

3. Columbia admits that a customer service representative informed complainant that a disconnect was scheduled for October 26, 2009. Columbia further avers that a disconnect did not occur on that date because Columbia did not have access inside the building and curb shut-off was impossible due to a foreign object being jammed in the curb box.

4. Columbia admits that it disconnected service at 675 Linwood Ave. on November 19, 2009. Columbia further avers that access inside the building was granted by the new tenant who was requesting service.

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5. Columbia denies the remaining allegations contained in the Complaint.

6. All allegations not expressly admitted herein are denied.

AFFIRMATIVE DEFENSES

1. Columbia avers that it has complied with all applicable Ohio Statutes, the Commission's Rules and Regulations and Columbia's Tariff.

COLUMBIA GAS OF OHIO, INC.

By: 
Brooke E. Leslie
Trial Attorney


Stephen B. Seiple, Assistant General Counsel
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COLUMBIA GAS OF OHIO, INC.

CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of January, 2010, a true and accurate copy of the foregoing *Answer of Columbia Gas Inc.* was served by email and by ordinary U.S. mail, postage prepaid, upon Ms. Erica Russell-Averette at the address below:

Ms. Erica Russell-Averette
P.O. Box 298012
Columbus, OH 43229


Brooke E. Leslie
Attorney for Respondent