

FILE

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BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

KELLY HINKLEY,

Complainant,

v.

THE EAST OHIO GAS COMPANY D/B/A  
DOMINION EAST OHIO,

Respondent.

Case No. 11-3659-GA-CSS

PUCO

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ANSWER

Pursuant to Ohio Adm. Code 4901-9-01(D), the Respondent, The East Ohio Gas Company d/b/a Dominion East Ohio ("DEO"), files its Answer to the Complaint of Kelly Hinkley (the "Complainant"):

FIRST DEFENSE

1. DEO admits that the Complainant has an account for service at 1425 Debra Drive, Ashtabula, Ohio 44004-9323.
2. DEO admits that it installed an automated meter reading ("AMR") device in January 2010.
3. DEO lacks sufficient information and knowledge to admit or deny the allegation that the Complainant called it in 2010 inquiring about moving her meter inside her home.
4. DEO lacks sufficient information and knowledge to admit or deny the allegation that it told the Complainant she could not move her meter and provided her with an 800 phone number.
5. DEO lacks sufficient information and knowledge to the allegations that the Complainant called an 800 phone number to obtain the name of a contractor.

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6. DEO lacks sufficient information and knowledge to the communications alleged between the Complainant and her contractors.

7. DEO lacks sufficient information and knowledge to the allegations that Plymouth Township delayed the Complainant's project.

8. DEO admits that it disconnected the Complainant's gas service on April 12, 2011, due to a potentially serious hazard of the meter being relocated inside the residence.

9. DEO admits that it shut off natural gas service due to the tampering switch being activated on the meter and the relocation of a meter receiving regulated pressure inside the house, causing a potential serious hazard.

10. DEO admits that it told the Complainant the meter would need to be relocated for natural gas service to be restored.

11. DEO denies generally any allegations not specifically admitted or denied in this Answer, pursuant to Ohio Adm. Code 4901-9-01(D).

### **SECOND DEFENSE**

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

### **THIRD DEFENSE**

13. DEO avers that the Complainant has been billed by DEO for bona fide, valid and authorized charges, and that all meter readings are correct.

### **FOURTH DEFENSE**

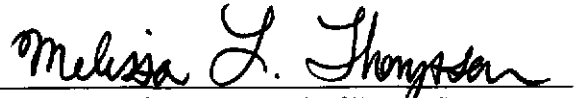
14. DEO at all times complied with Ohio Revised Code Title 49; the applicable rules, regulations and orders of the Public Utilities Commission of Ohio; and DEO's tariffs. These statutes, rules, regulations, orders and tariff provisions bar Complainant's claims.

**FIFTH DEFENSE**

15. 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,

A handwritten signature in black ink, reading "Melissa L. Thompson". The signature is written in a cursive style with a horizontal line underneath.

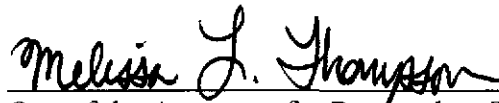
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ATTORNEYS FOR THE RESPONDENT  
THE EAST OHIO GAS COMPANY D/B/A  
DOMINION EAST OHIO

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Answer was served by ordinary U.S. mail, postage prepaid, to the following persons on this 11th day of July, 2011:

Kelly Hinkley  
1425 Debra Drive  
Ashtabula, Ohio 44004



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

860-009/285754