Alexander states:

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

JUDY ALEXANDER)			
Complainant)) Case No. 11-5601-GA-CSS			
v.)			
THE EAST OHIO GAS COMPANY D/B/A DOMINION EAST OHIO)	·. ~3	72	
DOMINION EAST OHIO			CE	
Respondent.	PU	2011 NOV 23	RECEIVED-DOCKETING	
ANSWER				
Pursuant to Ohio Adm. Code 4901-9-0	1(D), the Respondent, The East Ohio Gas	12: 18	AIO DNI	
Company d/b/a Dominion East Ohio ("DEO"),	, for its Answer to the Complaint of Judy		<	

FIRST DEFENSE

- 1. DEO admits that the Complainant is a customer of record for 8207 Beman Avenue, Unit D, Cleveland, Ohio 44105-5833 ("Downstairs Unit") and 8209 Beman Avenue, Unit U, Cleveland, Ohio 44105-5833 ("Upstairs Unit") (collectively, the "Premises").
- 2. DEO admits that R.C. 4905.26 governs this proceeding, but denies that the language quoted on page 2 of the Complaint is either applicable to DEO or is currently in effect.
- 3. DEO lacks sufficient knowledge and information to admit or deny the allegations contained on page 3 of the Complaint.
- 4. DEO lacks sufficient knowledge and information to admit or deny the allegations contained on page 4 of the Complaint.

This is	to certify	r that t	the image	es appe	aring	are	aı
accurate	and comp	leta rep	producti	on of a	Case	file	€
document	delivered	in the	regular	course	of bus	ines	s
Technicia	uz te	1	Date Proc	essed	11/2	3/20.	11

- 5. DEO admits the allegation that the Complainant called DEO to establish service at the Downstairs Unit in November 2010, but denies the remaining allegations on page 5 of the Complaint.
- 6. DEO lacks sufficient knowledge and information to admit or deny the allegations contained on page 6 of the Complaint.
- 7. DEO lacks sufficient knowledge and information to admit or deny the allegations contained on page 7 of the Complaint.
- 8. DEO admits that there is no gas service currently provided to the Upstairs Unit, but lacks sufficient knowledge and information to admit or deny the remaining allegations contained on page 8 of the Complaint.
- 9. DEO admits that it is not currently providing natural gas service to the Upstairs Unit, but denies the remaining allegations on page 9 of the Complaint.
- 10. DEO generally denies any allegations not specifically admitted in this Answer, pursuant to Ohio Adm. Code 4901-9-01(D).

SECOND DEFENSE

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

THIRD DEFENSE

12. DEO avers it properly billed the Complainant for all service at the Premises and disconnected the Complainant per the Complainant's request on May 5, 2011.

FOURTH DEFENSE

13. 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

14. 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,

Mark A. Whitt (Counsel of Record

Melissa L. Thompson

CARPENTER LIPPS & LELAND LLP

280 Plaza, Suite 1300

280 North High Street

Columbus, Ohio 43215

(614) 365-4100 (Telephone)

(614) 265-9145 (Facsimile)

whitt@carpenterlipps.com

thompson@carpenterlipps.com

ATTORNEYS FOR 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 person on this 23rd day of November, 2011:

Ms. Judy Alexander 4391 E. 86th Street Cleveland, Ohio 44105

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

Dominion East Ohio

860-009/299342