

BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

CLIMET N. RENFROE

Complainant,

v.

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

Respondent.

Case No. 12-294-GA-CSS

PUCO

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ANSWER

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

FIRST DEFENSE

1. DEO admits that it initiated service in June 2011 to the Complainant's current account, ending in numbers 7147, at 761 Providence Ct. Apt. 206, Streetsboro, Ohio 44241 (the "Current Account").

2. DEO admits that Complainant's June 22, 2011 billing statement for the Current Account includes an arrearage transfer of \$6,070.40, and that the total account balance due on this billing statement was \$6,103.95.

3. DEO admits that the arrearage transferred to the Current Account is comprised of \$5,805.52 for charges incurred at 11001 Mt. Overlook Avenue, Unit U, account ending in numbers 7043 (the "Upstairs Account") and \$264.88 for charges

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incurred at 11001 Mt. Overlook Avenue, Unit D, account ending in numbers 9470 (the "Downstairs Account").

4. DEO admits that the June 22, 2011 Billing Statement for the Upstairs Account showed a \$0 account balance due to the transfer of the arrearage to the Current Account.

5. DEO admits that the Upstairs Account was charged for service from March 22, 2002, to July 12, 2006.

6. DEO lacks sufficient knowledge or information to admit or deny the allegations concerning the alleged conversations between the Complainant and a DEO customer service representative.

7. DEO lacks sufficient knowledge or information to admit or deny the allegations concerning whether the Complainant gave anyone permission to open the Upstairs Account, whether the Complainant was aware of the PIPP program, or whether the Complainant enrolled in any program concerning the Upstairs Account.

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

#### **SECOND DEFENSE**

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

#### **THIRD DEFENSE**

10. DEO avers it properly billed the Complainant for charges incurred in the Upper Account, the Lower Account, and the Current Account.

#### **FOURTH DEFENSE**

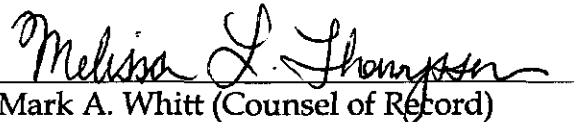
11. DEO at all times complied with Ohio Revised Code Title 49; the applicable rules, regulations and orders of the Public Utilities Commission of Ohio; and DEO's tariffs. These statutes rules, regulations and other tariff provisions bar Complainant's claims.

#### **FIFTH DEFENSE**

12. 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,



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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 ordinary U.S. mail, postage prepaid, to the following person on this 6th day of February, 2012:

Climet N. Renfro  
761 Providence Court, Apt. 206  
Streetsboro, Ohio 44241

A handwritten signature in cursive script, reading "Melissa L. Thompson", is written over a horizontal line.

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