

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

GWENDOLYN TANDY)	
)	
Complainant,)	
)	
v.)	Case No. 12-2102-EL-CSS
)	
THE CLEVELAND ELECTRIC ILLUMINATING COMPANY,)	
)	
Respondent.)	

ANSWER OF THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

The Cleveland Electric Illuminating Company (collectively “CEI”), by counsel, for its Answer to the Complaint states as follows:

1. CEI is a public utility, as defined by §4905.03(A)(4), O.R.C. and is duly organized and existing under the laws of the State of Ohio.

2. The Complaint consists of several pages with handwritten notes with allegations against different entities including FirstEnergy Solutions Corp. and the Ohio Department of Development. CEI cannot ascertain the nature of Complainant’s Complaint.

3. To the extent there are allegations against CEI in the Complaint, CEI denies the allegations contained in Complainant’s Complaint including those allegations that CEI lacks knowledge or information sufficient to form as to the truth of those allegations and therefore denies same.

For its affirmative defenses, CEI further avers that:

4. The Complaint fails to state reasonable grounds upon which its requested relief may be granted.

5. The Complaint fails to set forth reasonable grounds for a complaint, as Complainant has not alleged that CEI has violated any statute, rule, or tariff provision.

6. CEI at all times acted in accordance with its Tariff, PUCO No. 13, on file with the Public Utilities Commission of Ohio, as well as all rules and regulations as promulgated by the Public Utilities Commission of Ohio, the laws existing in the State of Ohio, and accepted standards and practices in the electric utility industry.

7. Complainant lacks standing to bring some of the claims in its Complaint.

8. CEI reserves the right to raise additional defenses as warranted by discovery or otherwise in this matter.

WHEREFORE, having fully answered the Complaint, CEI respectfully requests that the instant action be dismissed, and that it be granted any other relief that this Commission may deem just and reasonable.

Respectfully submitted,

/s/ Carrie M. Dunn
Carrie M. Dunn (#0076952)
Counsel of Record
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Akron, Ohio 44308
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On behalf of The Cleveland Electric
Illuminating Company

CERTIFICATE OF SERVICE

THIS IS TO CERTIFY that a copy of the foregoing Answer of The Cleveland Electric Illuminating Company was served by regular U.S. Mail, postage prepaid, upon Gwendolyn Tandy, 1439 Sulzer Avenue, Euclid, OH 44123

/s/ Carrie M. Dunn
Carrie M. Dunn
Attorney

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Case No(s). 12-2102-EL-CSS

Summary: Answer electronically filed by Ms. Carrie M Dunn on behalf of The Cleveland Electric Illuminating Company