

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

TERRANCE BILAL,)	
)	
Complainant,)	
)	Case No. 12-2430-EL-CSS
v.)	
)	
THE CLEVELAND ELECTRIC)	
ILLUMINATING COMPANY,)	
)	
Respondent.)	

ANSWER

In accordance with Ohio Admin. Code 4901-9-01(D), the Respondent, The Cleveland Electric Illuminating Company (“CEI” or the “Company”), for its answer to the complaint of Terrance Bilal states:

FIRST DEFENSE

1. CEI is without sufficient knowledge or information to either admit or deny the allegation that Mr. Bilal “believe[s] this is my wife [sic] bill.”
2. CEI denies the allegation that “Sept 21, 2005 according to Illuminating Co. [Mr. Bilal] owed 5,360.05 [sic].” CEI avers that Mr. Bilal’s actual account balance, as stated on his September 7, 2005 bill, was \$5,360.05.
3. CEI denies the allegation that “account no 110059887494 stated on March 25, 2009 [Mr. Bilal] owed 440.46 [sic].” CEI avers that Mr. Bilal’s actual account balance, as stated on his March 11, 2009 bill, was \$440.46.
4. CEI is without sufficient knowledge or information to either admit or deny the allegation that Mr. Bilal lived in a one-bedroom apartment.

5. CEI denies the allegation that it has claimed that Mr. Bilal lived at 15409 Euclid Ave. for 36 months. CEI further denies the allegation that it has claimed that Mr. Bilal did not “pay a dime during this” 36-month period.

6. CEI is without sufficient knowledge or information to either admit or deny the allegation that Mr. Bilal’s “light [sic] were off for six months.”

7. CEI denies the allegation that it claimed on “04-26-12 [Mr. Bilal] owe 5112.30 [sic].” CEI avers that an actual account balance of \$5,112.30 was transferred from account no. 110031945279 to account no. 110079604507 on April 26, 2012.

8. CEI is without sufficient knowledge or information to either admit or deny the allegations that what Mr. Bilal refers to as “this statement” is “only for the year of 2012” and that unspecified records go back “at least 5-7 years.”

9. CEI avers that the allegation that CEI “must have records to prove [its] claims otherwise it is only theft” is a legal conclusion and thus is not susceptible of admission or denial.

10. CEI is without sufficient knowledge or information to either admit or deny the allegation that it “said” that Mr. Bilal “owes” and “should pay extra money.”

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

AFFIRMATIVE DEFENSES

SECOND DEFENSE

12. CEI at all times complied with Ohio Revised Code Title 49; the applicable rules, regulations, and order of the Public Utilities Commission of Ohio; and CEI’s tariffs. These statutes, rules, regulations, orders, and tariff provisions bar Mr. Bilal’s claims.

THIRD DEFENSE

13. The complaint does not comply with the Commission's rules requiring "a statement which clearly explains the facts." Ohio Admin. Code 4901-9-01(B). Many of the allegations and statements in the complaint are compound, omit numerous details, or are otherwise difficult or impossible to understand, requiring CEI to speculate as to their meaning. CEI has attempted, to the best of its ability, to answer the allegations, but reserves the right to amend its answers in the event it has incorrectly understood them.

FOURTH DEFENSE

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

FIFTH DEFENSE

15. The complaint fails to state a claim upon which relief can be granted.

SIXTH DEFENSE

16. CEI reserves the right to raise other defenses as warranted by discovery in this matter.

WHEREFORE, CEI respectfully requests an Order dismissing the complaint and granting CEI all other necessary and proper relief.

Respectfully submitted,

/s/ Andrew J. Campbell
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ATTORNEYS FOR THE CLEVELAND
ELECTRIC ILLUMINATING COMPANY

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Answer was served by U.S. mail to the following person on this 24th day of September, 2012:

Terrance Bilal
7338 Euclid Ave. Apt. 106
Cleveland, Ohio 44103

/s/ Andrew J. Campbell
One of the Attorneys for The Cleveland
Electric Illuminating Company

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Case No(s). 12-2430-EL-CSS

Summary: Answer Answer of the Cleveland Electric Illuminating Co. electronically filed by Mr. Andrew J Campbell on behalf of The Cleveland Electric Illuminating Company