

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

JIM H. SNYDER

Complainant,

v.

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

Respondent.

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Case No. 14-1133-GA-CSS

ANSWER

In accordance with Ohio Adm. Code 4901-9-01(D), the Respondent, The East Ohio Gas Company d/b/a Dominion East Ohio (DEO or the Company), for its answer to the complaint of Jim H. Snyder states:

1. DEO admits that Complainant is a residential customer receiving natural gas service at 5036 Fairlawn Road, Lyndhurst, Ohio 44124 (the Premises).
2. DEO avers that the documents attached to the Complaint speak for themselves and are not allegations susceptible of admission or denial.
3. DEO admits that it disconnected Complainant's service due to Complainant's failure to provide DEO access to perform certain required inspections. DEO avers that the allegations that it "incorrectly disconnected [Complainant's] service without proper notice" and that the "incorrect shut off of service caused damage and harm to [Complainant]" are legal conclusions and are not susceptible of admission or denial.
4. The Company is without sufficient knowledge or information to admit or deny the remaining allegations of the Complaint and generally denies any allegation not specifically admitted or denied in this Answer in accordance with Ohio Adm. Code 4901-9-01(D).

AFFIRMATIVE DEFENSES

SECOND DEFENSE

6. The complaint does not comply with the Commission's rules requiring "a statement which clearly explains the facts." Ohio Adm. Code 4901-9-01(B).

THIRD DEFENSE

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

FOURTH DEFENSE

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

FIFTH DEFENSE

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

SIXTH DEFENSE

10. The Company reserves the right to raise other defenses as warranted by discovery in this matter.

Dated: July 14, 2014

Respectfully submitted,

/s/ Gregory L. Williams
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(Counsel are willing to accept service by email)

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 U.S. mail this 14th day of July to the following:

Jim H. Snyder
5036 Fairlawn Road
Lyndhurst, Ohio 44124

/s/ Gregory L. Williams
One of the Attorneys for
The East Ohio Gas Company d/b/a
Dominion East Ohio

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7/14/2014 5:10:22 PM

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Case No(s). 14-1133-GA-CSS

Summary: Answer to the Complaint electronically filed by Mr. Gregory L. Williams on behalf of The East Ohio Gas Company d/b/a Dominion East Ohio