

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

HELEN & DAN LAYTON)	
)	
Complainants,)	
)	
v.)	Case No. 14-1146-GA-CSS
)	
THE EAST OHIO GAS COMPANY D/B/A)	
DOMINION EAST OHIO,)	
)	
Respondent.)	

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 Helen and Dan Layton, states:

FIRST DEFENSE

1. DEO admits that Helen Layton was a residential customer receiving natural gas service at 4605 East 174th St., Cleveland, Ohio 44128 (the Premises) under an account number ending 4112.¹
2. DEO admits that Ms. Layton began receiving service on December 14, 2012, but denies that Ms. Layton maintained service as of June 19, 2014. DEO avers that Ms. Layton ceased receiving service under the account ending 4112 on May 31, 2013.
3. DEO avers that on January 8, 2013, it received a telephone call reporting a gas odor at the Premises. DEO further avers that in response to this call it dispatched service

¹ For ease of reference, only the last four numbers of the account are provided; the actual account number is longer.

personnel on an emergency order and that its service personnel left service disconnected when the Premises was found vacant.

4. DEO admits the allegation of the complaint regarding the identification of the employee who installed the new meter.

5. DEO is without sufficient knowledge or information to either admit or deny whether it reimbursed Complainants in March 1998.

6. DEO avers that the following allegations in paragraphs 4, 5, 10, 11, and 13 are legal conclusions and are not susceptible to admission or denial: allegations that DEO was negligent; allegations of the cause of damage to the Premises; allegations characterizing the amount or severity of damages; allegations regarding whether Complainants received proper notice; allegations regarding amounts due to Complainants; and allegations regarding causes of damage in prior incidents.

7. DEO avers that the documents attached to the Complaint speak for themselves and are not allegations susceptible of admission or denial. DEO neither attests to nor concedes the authenticity of these documents.

8. 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

9. 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). Many of the allegations and statements in the complaint are compound; and many of the allegations are

incomplete and omit numerous details necessary to answer them. The Company has attempted, to the best of its ability, to answer the allegations, but reserves the right to amend its Answer in the event it has incorrectly understood the allegations.

THIRD DEFENSE

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

FOURTH DEFENSE

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

FIFTH DEFENSE

12. 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

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

Dated: August 4, 2014

Respectfully submitted,

/s/ Gregory L. Williams
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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 U.S. mail this 4th day
of August 2014 to the following:

Helen & Dan Layton
9401 Mentor Ave #121
Mentor, Ohio 44060

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

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Case No(s). 14-1146-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