

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

| | | |
|-----------------|---|-------------------------|
| STEPHANIE AMOS, |) | |
| |) | |
| Complainant, |) | |
| |) | |
| v. |) | Case No. 14-1626-WW-CSS |
| |) | |
| AQUA OHIO, INC. |) | |
| |) | |
| Respondent. |) | |

ANSWER

In accordance with Ohio Adm. Code 4901-9-01(D), the Respondent, Aqua Ohio, Inc. (Aqua or the Company), for its answer to the complaint of Stephanie Amos states:

FIRST DEFENSE

1. Aqua admits that Ms. Amos is residential customer receiving waterworks service under an account ending 3131¹ at 1596 Pear Place, Mansfield, Ohio 44905.
2. Aqua admits that the bill dated July 10, 2014, covered the billing cycle from June 6 through July 8 and was in the amount of \$284.71.
3. Aqua denies that the July 10 bill was “erro[neous],” “discriminatory,” or “undue.”
4. Aqua denies that it “failed to thoroughly inspect the water meter to to [sic] rule-out [sic] a meter error.” Aqua avers that Ms. Amos has not requested that the Company test her meter.
5. Aqua avers that on July 23, 2014, a Company employee re-read Ms. Amos’s water meter and confirmed the accuracy of the meter reading on the July 10 bill.

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

6. Aqua is without sufficient knowledge or information to admit or deny the remaining allegations in the complaint, and generally denies any allegations not specifically admitted or denied in this Answer in accordance with Ohio Adm. Code 4901-9-01(D).

AFFIRMATIVE DEFENSES

SECOND DEFENSE

7. 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). The allegations are not in numbered-paragraph, but narrative, form; many of the allegations and statements in the complaint are compound; and many of the allegations 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

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

FOURTH DEFENSE

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

FIFTH DEFENSE

10. 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 Complainant's claims.

SIXTH DEFENSE

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

Accordingly, the Company respectfully requests an Order dismissing the complaint and granting it all other necessary and proper relief.

Dated: October 6, 2014

Respectfully submitted,

/s/ Gregory L. Williams

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ATTORNEYS FOR AQUA OHIO, INC.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Answer was served to the following person
by U.S. mail on this 6th day of October 2014:

Stephanie Amos
1596 Pear Place
Mansfield, Ohio 44905

/s/ Gregory L. Williams
One of the attorneys for Aqua Ohio, Inc.

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in

Case No(s). 14-1626-WW-CSS

Summary: Answer of the Respondent electronically filed by Mr. Gregory L. Williams on behalf of Aqua Ohio, Inc.