

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

RICHARD KNAPIK)	
)	
Complainant,)	
)	Case No. 14-1770-EL-CSS
v.)	
)	
OHIO EDISON COMPANY)	
)	
Respondent.)	
)	

ANSWER OF OHIO EDISON COMPANY

In accordance with Rule 4901-9-01(D), Ohio Administrative Code, the Respondent Ohio Edison Company (“Ohio Edison”) and for its answer to the Complaint of Richard Knapik (“Complainant”) states:

FIRST DEFENSE

1. Ohio Edison is a public utility, as defined by Section 4905.03(A)(4) Revised Code, and is duly organized and existing under the laws of the State of Ohio.
2. Complainant’s Complaint consists of one unnumbered page. Ohio Edison will attempt to specifically answer each allegation. To the extent Ohio Edison does not respond to a specific allegation, Ohio Edison denies such allegation.
3. On May 15, 2014, Ohio Edison billed Complainant for the service period of April 16, 2014 to May 15, 2014 based on an actual read. On May 23, 2014, Complainant or a member of Complainant’s household contacted Ohio Edison with concerns regarding a high bill. Ohio Edison’s representative reversed the bill based on the customer’s concern that it was a misread and rebilled the account using the average usage from last year during the same time period. However, when the actual read was taken on June 13, 2014, it became apparent that the May 15, 2014 bill

was correct and should not have been re-billed, causing the June 16, 2013 bill to reflect a higher bill than it would have had the May 15, 2014 not been reversed.

4. On June 22, 2014, the meter was removed and tested, registering at the average accuracy of 100.13% which is within the limits established by the Public Utilities Commission of Ohio.

5. Ohio Edison denies that the May 15, 2014 bill was incorrect. Ohio Edison further denies the remaining allegations in the Complaint.

AFFIRMATIVE DEFENSES

FIRST DEFENSE

7. The Complaint fails to allege that Ohio Edison has violated a rule or statute applicable to it.

SECOND DEFENSE

8. The Complaint fails to set forth reasonable grounds for complaint, as required by Section 4905.26, Revised Code.

THIRD DEFENSE

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

FOURTH DEFENSE

10. Ohio Edison at all times complied with Ohio Revised Code Title 49; the applicable rules, regulations, and order of the Public Utilities Commission of Ohio; and Tariff, PUCO No. 11, on file with the Public Utilities Commission of Ohio. These statutes, rules, regulations, orders, and tariff provisions bar Complainant's claims.

FIFTH DEFENSE

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

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

Respectfully submitted,

/s/ Carrie M. Dunn
Carrie M. Dunn (#0076952)
Counsel of Record
FirstEnergy Service Company
76 South Main Street
Akron, Ohio 44308
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On behalf of Ohio Edison 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 4th day of November 2014.

Richard Knapik
6024 Emerald Lakes Drive
Medina, Ohio 44256

/s/ Carrie M. Dunn

Attorney for Ohio Edison Company

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in

Case No(s). 14-1770-EL-CSS

Summary: Answer electronically filed by Ms. Carrie M Dunn on behalf of Ohio Edison Company