

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Complaint of)	
Zoraba Ross,)	
Complainant,)	
v.)	Case No. 15-2021-GA-CSS
)	
Columbia Gas of Ohio, Inc.,)	
Respondent.)	

ANSWER OF COLUMBIA GAS OF OHIO, INC.

Now comes the Respondent, Columbia Gas of Ohio, Inc. ("Columbia"), and files its Answer to the Complaint filed herein on December 2, 2015.

1. Columbia is without sufficient knowledge or information to either admit or deny the allegations in paragraph 1.
2. Columbia is without sufficient knowledge or information to either admit or deny the allegations in paragraph 2.
3. Columbia denies the allegations in paragraph 3.
4. Columbia is without sufficient knowledge or information to either admit or deny the allegations in paragraph 4.
5. Columbia is without sufficient knowledge or information to either admit or deny the allegations in paragraph 5.
6. Columbia is without sufficient knowledge or information to either admit or deny the allegations in paragraph 6.
7. Columbia denies the allegations in paragraph 7.
8. Columbia is without sufficient knowledge or information to either admit or deny the allegations in paragraph 8.
9. Columbia admits it provides distribution service to 1822 Fairhaven Road, Columbus, Ohio 43229.
10. Columbia denies generally any allegations not specifically denied in this Answer, pursuant to Ohio Adm. Code 4901-9-01(D).

Affirmative Defenses

11. Columbia avers that 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). The Complaint is not in numbered paragraph form and contains numerous opinions and irrelevant facts rather than specific allegations. As such, Columbia has been left to speculate as to the specific allegations in order to respond as required. Columbia reserves the right to amend its Answer in the event it has incorrectly understood the allegation in the Complaint.
12. Columbia avers that the Complainant has failed to state reasonable grounds for a complaint against Columbia as required by Ohio Revised Code § 4905.26, and Columbia avers that the Complainant has requested relief that the Public Utilities Commission of Ohio is not authorized to award.
13. Columbia avers that it has complied with all applicable Ohio statutes, the Commission's rules and regulations and Columbia's tariff.
14. Columbia reserves the right to raise other defenses as warranted by discovery in this matter.

Respectfully submitted by,

COLUMBIA GAS OF OHIO, INC.

/s/ Joseph M. Clark

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Attorneys for
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CERTIFICATE OF SERVICE

The Public Utilities Commission of Ohio's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the service list of the docket card who have electronically subscribed to the case. In addition, the undersigned hereby certifies that a copy of the foregoing document is also being served via ordinary U.S. Mail, postage prepaid on the 22nd day of December, 2015 upon the parties listed below.

/s/ Joseph M. Clark
Joseph M. Clark

**Attorney for
COLUMBIA GAS OF OHIO, INC.**

Zoraba Ross
1822 Fairhaven Road
Columbus, Ohio 43229

This foregoing document was electronically filed with the Public Utilities

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in

Case No(s). 15-2021-GA-CSS

Summary: Answer to Complaint electronically filed by Cheryl A MacDonald on behalf of Columbia Gas of Ohio, Inc.