

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

H. Stephen Cochran,)	
)	
Complainant,)	
)	Case No. 16-1934-GA-CSS
v.)	
)	
Suburban Natural Gas Company,)	
)	
Respondent.)	
)	

ANSWER OF SUBURBAN NATURAL GAS COMPANY

On September 20, 2016, Mr. H. Stephen Cochran (Mr. Cochran or Complainant) filed a complaint (Complaint) with the Public Utilities Commission of Ohio (Commission) against Suburban Natural Gas Company (Suburban or Respondent) regarding allegedly high natural gas charges for two months of natural gas service to his residence at 7739 Windy Hill Court, Lewis Center, Ohio 43035 (7739 Windy Hill) from May 5, 2016 through July 13, 2016. In his Complaint, Mr. Cochran requests that the Commission approve a fair adjustment of the service charges for the two months of allegedly high natural gas charges.

Pursuant to Rule 4901-9-01, Ohio Administrative Code (O.A.C.), Suburban hereby answers the Complaint filed in this proceeding by Mr. Cochran (as the allegations/statements appear in the Complaint) and states as follows:

ANSWER TO ALLEGATIONS

1. Suburban denies each and every allegation not specifically admitted.
2. Suburban admits that Mr. Cochran is a customer of record of Suburban.

3. Suburban admits that it provided natural gas service to the residence located at 7739 Windy Hill during the period May 5, 2016 through July 13, 2016.
4. Suburban admits that Suburban billed the customer of record at 7739 Windy Hill charges for natural gas service during the period of May 5, 2016 through June 6, 2016 in the amount of \$207.61.
5. Suburban admits that Suburban billed the customer of record at 7739 Windy Hill charges for natural gas service during the period of June 6, 2016 through July 13, 2016 in the amount of \$272.54.
6. Suburban is without sufficient knowledge or information to form a belief as to the truth of the allegation that only two persons used natural gas at 7739 Windy Hill during the period May 5, 2016 through June 6, 2016 and the period June 6, 2016 through July 13, 2016.
7. Suburban denies sending any correspondence to Mr. Cochran at 7739 Windy Hill during April 2016 regarding the existence of low service charges, the need to “check” the natural gas meter, or otherwise investigate low service charges as alleged by Complainant.
8. Suburban denies sending a representative to 7739 Windy Hill during April 2016 to investigate, test, or “check” the natural gas meter located at the property due to low service charges as alleged by Complainant. Suburban does not have a record of any work orders initiated for 7739 Windy Hill during April or May 2016.
9. Suburban denies that a representative of Suburban tampered with the natural gas meter at 7739 Windy Hill as alleged by the Complainant.

10. Suburban admits that, in addition to the regularly scheduled monthly meter readings, it conducted multiple additional readings of the natural gas meter located at 7739 Windy Hill on June 9, 2016, July 12, 2016, July 13, 2016, July 14, 2016, and July 18, 2016.
11. Suburban denies that Mr. Cochran has a history of modest gas service charges as alleged in the Complaint. On information and belief, Suburban asserts that Mr. Cochran had the highest natural gas consumption during the months of January 2016, May 2016, June 2016, July 2016, August 2016, and September 2016 as compared to other natural gas consumers located on Windy Hill Court served by Suburban.
12. Suburban admits that it removed and replaced the natural gas meter at 7739 Windy Hill on July 13, 2016.
13. Suburban admits that it tested the removed natural gas meter on July 18, 2016 in Suburban's offices and the results of those tests indicated that the removed meter functioned properly. Suburban states that it sent those test results in a letter to Mr. Cochran on July 18, 2016.
14. Suburban denies that it performed any "meter adjustments" to the removed natural gas meter prior to the meter test conducted on July 18, 2016.
15. Suburban denies that the removed natural gas meter at 7739 Windy Hill was faulty or tampered with as alleged in the Complaint.
16. Suburban denies that it inspected Mr. Cochran's gas appliances as alleged in the Complaint. Suburban is without sufficient knowledge or information to form a belief as to the truth of the claim that Complainant arranged for his natural gas appliances to be inspected by other professionals and that the natural gas appliances installed at the property are operating properly.

17. Suburban avers that subsequent to replacing the natural gas meter at 7739 Windy Hill, consumption at the property continued at a similar, high natural gas usage rate (ccf per day average).
18. Suburban admits that its Director of Customer Service and Administration spoke with Mr. Cochran on several occasions, including August 16, 2016, during which time Mr. Cochran requested an adjustment to his charges.
19. Suburban admits that Mr. Cochran's request for an adjustment was denied. Suburban avers that Mr. Cochran's adjustment request was denied given that the natural gas meter located at 7739 Windy Hill was tested by Suburban and found to be working properly and the replacement gas meter registered a similarly high natural gas usage rate.
20. Suburban avers that Mr. Cochran's actual natural gas consumption was five times greater than the next highest consumer on Windy Hill Court during the first service month after the replacement meter was installed.
21. As stated previously, Suburban is without sufficient knowledge or information to form a belief as to the truth of the assertion that only two persons resided and consumed natural gas at the property during the period from during the period May 5, 2016 through June 6, 2016 and the period June 6, 2016 through July 13, 2016. Similarly, Suburban is also without sufficient knowledge or information to form a belief as to the truth of the statement that six persons resided and consumed natural gas at the property during the period July 13, 2016 through August 4, 2016.
22. As to Complainant's personal commentary and information about Complainant's activities, guests, and natural gas consumption habits, which assert no allegations capable

of a response, Suburban is without sufficient knowledge or information to form a belief as to the truth of the statements contained in the Complaint.

AFFIRMATIVE DEFENSES

1. Suburban asserts that the Complaint fails to satisfy Rule 4901-9-01(B), Ohio Administrative Code, requiring a “statement which clearly explains the facts.” The Complaint is not in numbered paragraph form and contains numerous opinions rather than specific allegations.
2. Suburban asserts that Mr. Cochran has failed to allege reasonable grounds upon which relief may be granted as required by Section 4905.26, Ohio Revised Code, and Rule 4901-9-01(C)(3), Ohio Administrative Code.
3. Suburban states that it has complied with all applicable Ohio statutes, the Commission’s rules and regulations, and Suburban’s applicable tariff.
4. Suburban reserves the right to raise other defenses as warranted by discovery in this matter.

PRAYER FOR RELIEF

WHEREFORE, Suburban respectfully requests that the Commission grant the following relief:

1. Find that Mr. Cochran fails to set forth reasonable grounds for a complaint;
2. Deny Mr. Cochran the relief he requests; and
3. Order any other relief for Suburban that the Commission deems appropriate, just, and reasonable.

Respectfully submitted,



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Attorneys for Suburban Natural Gas Company

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was served upon the following parties via United States mail service on October 13, 2016.


Kimberly W. Bojko

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Summary: Answer Of Suburban Natural Gas Company electronically filed by Debra A Gaunder on behalf of Suburban Natural Gas Company