

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

RUTH VON BUSSE,)	
)	
Complainant,)	
)	
v.)	Case No. 16-1961-EL-CSS
)	
THE CLEVELAND ELECTRIC)	
ILLUMINATING COMPANY)	
)	
Respondent.)	
)	

ANSWER OF THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

The Cleveland Electric Illuminating Company (“CEI”) is a public utility as defined by § 4905.03(C) of the Ohio Revised Code, and is duly organized and existing under the laws of the State of Ohio. The Complaint of Ruth von Busse (“Complainant”) consists of one cover page and eight (8) unnumbered pages. CEI will attempt to specifically answer each allegation in the Complaint. To the extent CEI does not respond to a specific allegation, CEI denies any such allegation.

Therefore, in accordance with Rule 4901-9-01(D) of the Ohio Administrative Code, Respondent CEI for its answer to the Complaint states:

FIRST DEFENSE

1. As to the allegations contained on the first unnumbered page of the Complaint, CEI admits that Complainant is a customer of CEI. CEI denies any remaining allegations contained on the first unnumbered page of the Complaint.

2. CEI states that the attachments referenced by Complainant on the second unnumbered page of the Complaint speak for themselves and, as such, no further response is

required. CEI lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations contained on the second unnumbered page of the Complaint.

3. CEI states that the attachments referenced by Complainant on the third unnumbered page of the Complaint speak for themselves and, as such, no further response is required. CEI denies any remaining allegations contained on the third unnumbered page of the Complaint.

4. CEI denies all allegations contained on the fourth unnumbered page of the Complaint.

5. CEI states that the remaining attachments, encompassing unnumbered pages five through eight of the Complaint speak for themselves and, as such, no further response is required.

6. CEI denies any remaining allegations contained in the Complaint.

SECOND DEFENSE

7. The Complaint fails to set forth reasonable grounds, as required by Section 4905.26 of the Revised Code.

THIRD DEFENSE

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

FOURTH DEFENSE

9. CEI at all times complied with Ohio Revised Code Title 49; the applicable rules, regulations, and orders of the Public Utilities Commission of Ohio; and Tariff, PUCO No. 13, on file with the Public Utilities Commission of Ohio. These statutes, rules, regulations, orders, and tariff provisions bar Complainant's claims.

FIFTH DEFENSE

10. CEI reserves the right to supplement its answer with other defenses, including affirmative defenses, as discovery progresses in this matter.

WHEREFORE, CEI requests an order dismissing the Complaint and granting CEI any other relief deemed necessary and proper.

Respectfully submitted,

/s/ Erika Ostrowski

Erika Ostrowski (#0084579)

Counsel of Record

FirstEnergy Service Company

76 South Main Street

Akron, Ohio 44308

Telephone: 330-384-5803

Facsimile: 330-384-3875

eostrowski@firstenergycorp.com

On Behalf of The Cleveland Electric
Illuminating Company

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Answer of The Cleveland Electric Illuminating Company was served upon the following by U.S. mail on this 18th day of October, 2016.

Ruth von Busse
20265 Orchard Grove
Rocky River, Ohio 44116

/s/ Erika Ostrowski

Attorney for The Cleveland Electric
Illuminating Company

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

10/18/2016 9:15:12 AM

in

Case No(s). 16-1961-EL-CSS

Summary: Answer of The Cleveland Electric Illuminating Company electronically filed by Ms. Erika Ostrowski on behalf of The Cleveland Electric Illuminating Company