

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

RACHEL CLINE,)	
)	
Complainant,)	
)	Case No. 17-0196-EL-CSS
v.)	
)	
OHIO EDISON COMPANY,)	
)	
Respondent.)	
)	

ANSWER OF OHIO EDISON COMPANY

Ohio Edison Company (“Ohio Edison”) 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 Rachel Cline (“Complainant”) consists of three unnumbered pages, containing eight unnumbered paragraphs and a spreadsheet. Ohio Edison will attempt to specifically answer each allegation in the Complaint. To the extent Ohio Edison does not respond to a specific allegation, Ohio Edison denies any such allegation.

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

FIRST DEFENSE

1. As to the allegations in the first unnumbered paragraph of the Complaint, Ohio Edison admits that Complainant’s meter was replaced on or about October 11, 2016. Ohio Edison further admits that Complainant’s average bill from September 2014 through September 2015 was approximately \$88.06 per month and that Complainant’s average bill from October 2015 through October 2016 was approximately \$141.88. Ohio Edison denies the remaining allegations in the first unnumbered paragraph of the Complaint.

2. As to the allegations in the second unnumbered paragraph of the Complaint, Ohio Edison incorporates by reference its responses to the allegations in the first unnumbered paragraph of the Complaint. Ohio Edison denies any remaining allegations in the second unnumbered paragraph of the Complaint.

3. As to the allegations in the third unnumbered paragraph of the Complaint, Ohio Edison incorporates by reference its responses to the allegations in the first and second unnumbered paragraphs of the Complaint. Ohio Edison lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in the third unnumbered paragraph of the Complaint and, therefore, denies the same.

4. As to the allegations in the fourth unnumbered paragraph of the Complaint, Ohio Edison admits that Complainant contacted Ohio Edison on December 7, 2016. Ohio Edison further admits that the meter removed from Complainant's property in October 2016, Meter 950931147, was no longer available to be tested at that time. Ohio Edison denies any remaining allegations in the fourth unnumbered paragraph of the Complaint.

5. Ohio Edison denies the allegations in the fifth unnumbered paragraph of the Complaint.

6. Ohio Edison states that the averments contained in the sixth unnumbered paragraph of the Complaint require no response. To the extent a response is required, Ohio Edison denies those assertions.

7. Ohio Edison states that the averments contained in the seventh unnumbered paragraph of the Complaint require no response. To the extent a response is required, Ohio Edison denies those assertions.

8. Ohio Edison lacks knowledge or information sufficient to form a belief as to the truth of the allegations in the eighth unnumbered paragraph of the Complaint and, therefore, denies the same.

9. Ohio Edison states that the averments contained on the third unnumbered page of the Complaint require no response. To the extent a response is required, Ohio Edison denies those assertions.

10. Ohio Edison denies any remaining allegations in the Complaint.

SECOND DEFENSE

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

THIRD DEFENSE

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

FOURTH DEFENSE

13. Ohio Edison at all times complied with the Ohio Revised Code Title 49; the applicable rules, regulations, and orders 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

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

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

Respectfully submitted,

/s/ Joshua R. Eckert

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Counsel of Record

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On behalf of Ohio Edison Company

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Answer of Ohio Edison Company has been served upon the following by U.S. mail on this 8th day of February, 2017.

Rachel Cline
899 Esther Ave NW
Warren, Ohio 44483

/s/ Joshua R. Eckert
Attorney for Ohio Edison Company

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Case No(s). 17-0196-EL-CSS

Summary: Answer of Ohio Edison Company electronically filed by Mr. Joshua R. Eckert on behalf of Ohio Edison Company