

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Complaint of	)	
Mike Papadakis	)	
Complainant,	)	
v.	)	Case No. 17-1693-GA-CSS
	)	
SouthStar Energy Services LLC (dba	)	
Ohio Natural Gas)	)	
and	)	
Columbia Gas of Ohio, Inc.,	)	
	)	
Respondents.	)	

---

---

**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 July 28, 2017.

1. Columbia is generally without sufficient knowledge to either admit or deny the allegations in the Complaint.

**Affirmative Defenses**

2. Columbia avers that the Complainant has failed to state reasonable grounds for a complaint against Columbia as required by Ohio Revised Code § 4905.26.
3. Columbia avers that the Complainant has failed to state a claim for which relief can be granted.
4. Columbia avers that it has complied with all applicable Ohio statutes, the Commission's rules and regulations and Columbia's tariff.
5. 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

Joseph M. Clark, Counsel of Record

Stephen B. Seiple, Asst. General Counsel  
(0003809)

Joseph M. Clark, Sr. Counsel (0080711)

P.O. Box 117

290 W. Nationwide Blvd.

Columbus, Ohio 43216-0117

Telephone: (614) 460-6988

E-mail: sseiple@nisource.com

josephclark@nisource.com

(Willing to accept service by e-mail)

Attorneys for

**COLUMBIA GAS OF OHIO, INC.**

## 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 or via electronic mail on the 14<sup>th</sup> day of August, 2017 upon the parties listed below.

/s/ Joseph M. Clark  
Joseph M. Clark

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

Mike Papadakis  
5346 Pin Oak Circle  
Sheffield Village, Ohio 44054

Andrew C. Emerson  
L. Bradfield Hughes  
Porter Wright Morris & Arthur LLP  
41 South High Street  
Columbus, OH 43215  
Email: aemerson@porterwright.com  
bhughes@porterwright.com

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**8/14/2017 3:33:15 PM**

**in**

**Case No(s). 17-1693-GA-CSS**

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