

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

MARK LASMANIS,)	
)	
Complainant,)	
)	
v.)	Case No. 17-1749-GA-CSS
)	
THE EAST OHIO GAS COMPANY D/B/A)	
DOMINION ENERGY OHIO,)	
)	
Respondent.)	

ANSWER

In accordance with Ohio Adm. Code 4901-9-01(D), the Respondent, The East Ohio Gas Company d/b/a Dominion Energy Ohio (DEO or the Company), for its answer to the complaint of Mark Lasmanis (Complainant), states:

FIRST DEFENSE

1. DEO admits that Mr. Lasmanis is a residential customer receiving natural gas service at 29619 Cresthaven Drive, Willowick, Ohio 44095 (the Premises).
2. DEO avers that on March 7, 2017, it replaced an exterior service line and successfully conducted a test of the house lines at the Premises.
3. DEO avers that while the field service representative (FSR) was relighting other appliances in the home, the furnace malfunctioned and was damaged. DEO avers that upon further inspection, the furnace appeared to have a defective control valve, which caused the damage. DEO avers its review disclosed that the furnace had a manufacture date of 1996 and a recommended useful life of ten years.
4. DEO avers that the regulator to the Premises had been set within normal operating pressures and that tests confirmed that house-line pressure was in the normal range.

5. DEO admits that it denied Mr. Lasmanis's claim.

6. DEO is without sufficient knowledge or information to admit or deny the remaining allegations in the complaint, and generally denies any allegations not specifically admitted or denied in this Answer in accordance with Ohio Adm. Code 4901-9-01(D).

AFFIRMATIVE DEFENSES

SECOND DEFENSE

7. The complaint does not comply with the Commission's rules requiring "a statement which clearly explains the facts." Ohio Adm. Code 4901-9-01(B). Many of the allegations are not in numbered-paragraph, but narrative, form; many of the allegations and statements in the complaint are compound; and many of the allegations omit numerous details necessary to answer them. The Company, has attempted, to the best of its ability, to answer the allegations, but reserves the right to amend its answer in the event it has incorrectly understood the allegations.

THIRD DEFENSE

8. The complaint fails to set forth reasonable grounds for complaint, as required by R.C. 4905.26.

FOURTH DEFENSE

9. The complaint does not set forth a claim for which relief may be granted.

FIFTH DEFENSE

10. DEO 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 the Company's tariffs. These statutes, rules, regulations, orders and tariff provisions bar Mr. Lasmanis's claims.

SIXTH DEFENSE

11. DEO avers that the complaint is barred by laches, waiver, and estoppel.

SEVENTH DEFENSE

12. DEO reserves the right to raise other defenses as warranted by discovery in this matter.

WHEREFORE, DEO respectfully requests an Order dismissing the complaint and granting it all other necessary and proper relief.

Dated: August 28, 2017

Respectfully submitted,

/s/ Andrew J. Campbell

Mark A. Whitt (0067996)

Andrew J. Campbell (0081485)

Rebekah J. Glover (0088798)

WHITT STURTEVANT LLP

The KeyBank Building, Suite 1590

88 East Broad Street

Columbus, Ohio 43215

Telephone: (614) 224-3946

Facsimile: (614) 224-3960

whitt@whitt-sturtevant.com

campbell@whitt-sturtevant.com

glover@whitt-sturtevant.com

(All counsel are willing to accept service by email)

ATTORNEYS FOR THE EAST OHIO GAS
COMPANY D/B/A DOMINION ENERGY OHIO

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Answer was served by mail to the following person this 28th day of August, 2017:

Mark Lasmanis
29619 Cresthaven Drive
Willowick, Ohio 44095

/s/ Rebekah J. Glover
One of the Attorneys for The East Ohio Gas
Company d/b/a Dominion Energy Ohio

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Case No(s). 17-1749-GA-CSS

Summary: Answer electronically filed by Ms. Rebekah J. Glover on behalf of The East Ohio Gas Company d/b/a Dominion Energy Ohio