

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

ERIN DAHL,)	
)	
Complainant,)	
)	
v.)	Case No. 17-1822-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 Erin Dahl, states:

FIRST DEFENSE

1. DEO admits that Ms. Dahl was a customer receiving natural gas service at 5918 Maplewood Road, Unit D, Mayfield Heights, Ohio 44124 (the Premises). DEO avers that as of September 1, 2017, Ms. Dahl's account has been closed and that another party has begun receiving service at the Premises under a separate account.

2. DEO avers that on January 17, 2017, Ms. Dahl contacted the Company regarding high bills she alleged to have received beginning October 2016. DEO avers that its customer service representative discussed these issues with Ms. Dahl but did not observe any errors or discrepancies concerning billing and usage on the account.

3. DEO avers that from February through April 2017, DEO engaged in numerous contacts and attempted contacts with Ms. Dahl regarding billing and usage on the account, including cooperating with the resolution of an informal complaint filed with the Commission.

4. DEO avers that on May 1, 2017, Ms. Dahl requested a meter test. DEO avers that its representative explained the meter-test process, including the fact that Ms. Dahl's meter would be removed, a replacement meter would be installed, and her meter would be tested at a different location.

5. DEO avers that throughout May 2017, it contacted Ms. Dahl several times attempting to arrange a meter test and to obtain the necessary signed form to perform the test.

6. DEO avers that on July 28, 2017, Ms. Dahl contacted DEO to schedule the meter test. DEO avers that on that same day, it mailed a letter to Ms. Dahl informing her of the scheduled meter test, which was to take place at 1201 E. 55th Street, Cleveland, Ohio 44103, and that she would be permitted to witness the test if she so chose.

7. DEO avers that on August 2, 2017, a technician arrived at the Premises to begin the meter-test process, including testing the service line, house lines, pipes, and fittings for leaks, and found none. DEO avers that Ms. Dahl was present but refused to allow the technician to remove the meter for the test, requesting that the test instead be performed at the Premises.

8. DEO avers that Ms. Dahl's billing dispute was denied because Ms. Dahl refused to allow the meter test and because review of Ms. Dahl's account did not otherwise disclose any evidence suggesting that usage or bills on her account had been improperly measured or calculated.

9. DEO avers that whether any provision of the Ohio Revised Code or Ohio Administrative Code requires meter tests to be performed at a location requested by a customer is a legal conclusion and is not susceptible of admission or denial.

10. DEO avers that it is willing to test Ms. Dahl's meter in her presence and that it will do so if authorized by Ms. Dahl. DEO further avers, however, that performing meter tests at any customer's premises is neither feasible nor, to DEO's understanding, required by Ohio law.

11. 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). DEO neither attests nor concedes to the authenticity of any document attached to the Complaint.

AFFIRMATIVE DEFENSES

SECOND DEFENSE

12. 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). The allegations are not in numbered-paragraph, but narrative, form; many of the allegations and statements in the complaint are compound and argumentative; 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

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

FOURTH DEFENSE

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

FIFTH DEFENSE

15. The complaint is barred by laches, waiver, and estoppel.

SIXTH DEFENSE

16. 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 Ms. Dahl's claims.

SEVENTH DEFENSE

17. 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: September 11, 2017

Respectfully submitted,

/s/ Andrew J. Campbell

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ATTORNEYS FOR THE EAST OHIO GAS
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Answer was served by mail to the following persons this 11th day of September, 2017:

Erin Dahl
5918 Maplewood Road, Unit D
Mayfield Heights, Ohio 44124

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

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