

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

Timothy Dials,

Complainant,

v.

Ohio Power Company,

Respondent.

Case No. 18-224-EL-CSS

ANSWER OF RESPONDENT OHIO POWER COMPANY

Ohio Power Company (“AEP Ohio”) hereby responds as follows to the allegations contained in the Complaint that Complainant Timothy Dials filed in this proceeding on February 2, 2018:

ANSWER TO ALLEGATIONS

1. AEP Ohio admits that Complainant is a customer of AEP Ohio and that Complainant made an informal complaint in September 2017, which was resolved.
2. AEP Ohio avers that Complainant is not enrolled in the PIPP program and that Complainant has not complied with the requirements necessary to maintain service under the Winter Reconnect Order.
3. AEP Ohio denies the allegation in the Complaint relating to the OCC Ohio website for lack of information or knowledge sufficient to form a belief thereon.
4. AEP Ohio denies each and every remaining allegation set forth in the Complaint.

AFFIRMATIVE DEFENSES

1. AEP Ohio avers that Complainant has failed to state reasonable grounds for a complaint as required by R.C. 4905.26.
2. AEP Ohio avers that the Complaint fails to comply with the Commission's rules requiring a "statement which clearly explains the facts." Ohio Adm. Code 4901-9-01(B). The Complaint is not in numbered paragraph form and contains opinions and irrelevant facts rather than specific allegations. As such, AEP Ohio has been left to speculate as to the specific allegations in order to respond as required. AEP Ohio reserves the right to amend its Answer in the event it has incorrectly understood any allegation in the Complaint.
3. AEP Ohio, at all times, complied with all applicable Ohio statutes; Commission's rules, regulations, and orders; and AEP Ohio's Tariff.
4. AEP Ohio provided reasonable and adequate service to Complainant at all times relevant.
5. Complainant is not enrolled in the PIPP program.
6. Complainant has not complied with the requirements necessary to maintain service under the Winter Reconnection Order.
7. AEP Ohio reserves the right to raise additional affirmative defenses as warranted as this matter proceeds.

WHEREFORE, having fully responded to the Complaint, Respondent Ohio Power Company respectfully requests that the Public Utilities Commission of Ohio dismiss the Complaint with prejudice and grant the Company all other necessary and proper relief.

Respectfully submitted,

/s/ Christen M. Blend

Christen M. Blend (0086881)

Counsel of Record

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**Counsel for Respondent
Ohio Power Company**

CERTIFICATE OF SERVICE

The undersigned certifies that a true and accurate copy of the foregoing was served upon Complainants at the address listed below by regular U.S. mail, postage prepaid, on this 21st day of February, 2017.

Timothy Dials
8243 Chippenham Drive
Dublin, Ohio 43016

Complainant

/s/ Christen M. Blend

Christen M. Blend

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Case No(s). 18-0224-EL-CSS

Summary: Answer -Answer of Respondent Ohio Power Company electronically filed by Ms. Christen M. Blend on behalf of Ohio Power Company