

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

LINDA KIRBY

Complainant,

v.

OHIO EDISON COMPANY

Respondent.

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Case No. 18-0691-EL-CSS

ANSWER OF THE OHIO EDISON COMPANY

The Ohio Edison Company (“Ohio Edison”) is a public utility company 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. In accordance with Rule 4901-9-01(D), Ohio Administrative Code, the Respondent, Ohio Edison Company for its answer to the Complaint of Linda Kirby (“Complainant”) states:

Complainant’s Complaint consists of random facts within unnumbered paragraphs. To the extent that an allegation is not specifically addressed below, it is hereby denied.

1. Ohio Edison denies all allegations related to the behavior and health of Complainant’s cows.
2. Ohio Edison denies all allegations related to any findings or tests not performed by Ohio Edison personnel.
3. Ohio Edison admits it tested and found elevated neutral-to-earth voltage (“NEV”).
4. Ohio Edison admits it promptly installed a neutral isolator after finding elevated NEV.

AFFIRMATIVE DEFENSES

5. The Complaint fails to set forth reasonable grounds for Complaint, as required by Section 4905.26, Revised Code.
6. The Complaint fails to state a claim upon which relief can be granted.
7. The Commission lacks subject matter jurisdiction over some or all of Complainant's claims.
8. Ohio Edison reserves the right to raise other defenses as warranted by discovery in this matter.

WHEREFORE, Ohio Edison respectfully requests an Order dismissing the Complaint and granting Ohio Edison all other necessary and proper relief.

Respectfully submitted

/s/ Scott J. Casto
Scott J. Casto (0085756)
Counsel of Record
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Akron, OH 44308
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Attorney for Ohio Edison Company

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Answer was served by U.S. mail to the following person on this 4th day of May 2018.

Linda Kirby
2222 Cooks Lane
N. Bloomfield, OH 44450

/s/ Scott J. Casto
Attorney for Ohio Edison Company

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Case No(s). 18-0691-EL-CSS

Summary: Answer of Ohio Edison Company electronically filed by Mr. Scott J Casto on behalf of Ohio Edison Company