

ELLEN PASQUINELLI)	
75 Lake Street)	
Xenia, Ohio 45385)	Case No. 18-0790-EL-CSS
)	
Complainant,)	
v.)	
)	
The Dayton Power and Light Company)	
1065 Woodman Drive)	
Dayton, Ohio 45432)	
)	
Respondent.)	

Now comes the Dayton Power and Light Company (“DP&L” or “Respondent” or “the Company”), by and through counsel, and for its answer to the Complaint filed in this docket by Ellen Pasquinelli (“Complainant”), hereby states as follows:

1. On or about May 3, 2018, the Public Utilities Commission of Ohio (“the Commission”) accepted for filing a Complaint by Complainant alleging generally that DP&L improperly charged Complainant.

2. DP&L admits that the first bill sent to Complainant at the address of 75 Lake Street, Xenia, Ohio 45353 on December 19, 2017, reflected a final bill transfer of \$4,833.09. The final bill transfer balance reflected a previously incurred amount for services rendered to the Complainant at 600 South Stringtown Rd. Xenia, Ohio 45385.

3. DP&L admits that the Company provided Complainant with debit/credit history upon request for documentation.

4. The Respondent, DP&L, denies or is without sufficient knowledge to ascertain the veracity of the remaining allegations as described in the Complaint and

therefore denies the same. At all pertinent times, DP&L has complied with all relevant statutes, regulations, and approved tariffs.

FIRST AFFIRMATIVE DEFENSE

5. The Complainant fails to set forth reasonable grounds for complaint, as required by Section 4905.26, Revised Code.

SECOND AFFIRMATIVE DEFENSE

6. The Complainant fails to state a claim upon which relief can be granted.

THIRD AFFIRMATIVE DEFENSE

7. At all pertinent times, DP&L has complied with all relevant statutes, regulations, and approved tariffs. These statutes, rules, regulations, orders, and tariff provisions bar Complainant's claims.

FOURTH AFFIRMATIVE DEFENSE

8. DP&L reserves the right to raise any additional affirmative defenses as warranted by discovery in this matter.

WHEREFORE, Respondent respectfully requests that the Commission dismiss DP&L from this Complaint. To the extent that the Commission denies such motion, Respondent hereby requests the opportunity to mediate this issue with the Complainant to determine whether a mutually acceptable resolution is possible.

Respectfully submitted,

/s/ Michael J. Schuler

Michael J. Schuler (0082390)

*Counsel of Record

The Dayton Power and Light Company

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Dayton, OH 45432

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Attorney for The Dayton Power and Light
Company

(willing to accept electronic service)

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been sent via ordinary mail,
postage prepaid, this 23rd day of May, 2018 to the following:

Ellen Pasquinelli
75 Lake Street
Xenia, Ohio 45385

/s/ Michael J. Schuler

Michael J. Schuler (0082390)

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in

Case No(s). 18-0790-EL-CSS

Summary: Answer ANSWER, MOTION TO DISMISS, AND REQUEST FOR MEDIATION OF THE DAYTON POWER AND LIGHT COMPANY electronically filed by Mrs. Pauline M Olon on behalf of The Dayton Power and Light Company and ELLEN PASQUINELLI