

**BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO**

**J. Dan Sherwin,**

**Complainant,**

**v.**

**Ohio Power Company,**

**Respondent.**

**Case No. 18-583-EL-CSS**

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**ANSWER OF RESPONDENT OHIO POWER COMPANY**

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Pursuant to Rule 4901-9-01(B) of the Ohio Administrative Code, Ohio Power Company (“AEP Ohio” and “the Company”) hereby responds as follows to the allegations contained in the Complaint that Complainant J. Dan Sherwin filed in this proceeding on June 13, 2018:

**ANSWER TO ALLEGATIONS**

1. AEP Ohio admits that Complainant is a customer of AEP Ohio.
2. AEP Ohio admits that Complainant received a bill for \$860.15 in April 2018. AEP Ohio denies that the bill was received on April 10, 2018 for lack of information or knowledge sufficient to form a belief thereon.
3. AEP Ohio admits that a new advanced metering infrastructure (“AMI”) meter was installed on Complainant’s property and avers that the AMI meter was installed on March 29, 2018.
4. AEP Ohio denies that Complainant’s electric bill “had been consistently around \$100 since \* \* \* July of 2017.”
5. AEP Ohio admits that Complainant’s monthly usage did not exceed 600 kWh before January 2018.

6. AEP Ohio denies Complainant's assertion, in the third full paragraph of the Complaint, that changing usage habits would be the only acceptable reason to have a bill increase.

7. AEP Ohio denies the remaining allegations contained in the second and third full paragraphs of the Complaint for lack of information or knowledge sufficient to form a belief thereon.

8. AEP Ohio denies that Complainant was denied the option to opt out of AMI installation at his home.

9. 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, at all times, complied with all applicable Ohio statutes; the Commission's rules, regulations, and orders; and AEP Ohio's tariff.

3. AEP Ohio provided reasonable and adequate service to Complainant at all times relevant.

4. AEP Ohio reserves the right to raise additional affirmative defenses as warranted as this matter proceeds.

5. The relief that Complainant seeks is neither appropriate under the Commission's rules nor available here.

**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/ Julie E. Sanders

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Counsel of Record

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(willing to accept service by e-mail)

**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 2nd day  
of July, 2018.

J. Dan Sherwin  
2047 Wolverhampton Rd  
Powell, OH 43065

**Complainant**

/s/ Julie E. Sanders  
Julie E. Sanders

**This foregoing document was electronically filed with the Public Utilities**

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Summary: Answer electronically filed by Julie E Sanders on behalf of Ohio Power Company