

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

ROBERT L. ROOT III)	
)	
Complainant,)	
)	Case No. 18-1387-EL-CSS
v.)	
)	
OHIO EDISON COMPANY)	
)	
Respondent.)	
)	

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 Robert L. Root III (“Complainant”) states:

Complainant’s Complaint consists of a single paragraph with unnumbered sentences. To the extent that an allegation is not specifically addressed below, it is hereby denied.

1. Ohio Edison denies there was a city-wide power outage on August 6, 2018.
2. Ohio Edison denies all allegations related to any customer-owned equipment, including but not limited to, Complainant’s fuses and television
3. Ohio Edison admits it denied Complainant’s claim.

AFFIRMATIVE DEFENSES

4. The Complaint fails to set forth reasonable grounds for Complaint, as required by Section 4905.26, Revised Code.

5. The Complaint fails to state a claim upon which relief can be granted.
6. The Commission lacks subject matter jurisdiction over some or all of Complainant's claims.
7. 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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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 26th day of September 2018.

Robert Root
5352 Warren Sharon Rd.
Vienna, OH 44473

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

This foregoing document was electronically filed with the Public Utilities

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in

Case No(s). 18-1387-EL-CSS

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