

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

JOHN STEWART,)	
)	
Complainant,)	
)	Case No. 18-1531-EL-CSS
v.)	
)	
THE CLEVELAND ELECTRIC)	
ILLUMINATING COMPANY,)	
)	
Respondent.)	

ANSWER OF THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

The Cleveland Electric Illuminating Company (“CEI”) 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, CEI, for its answer to the Complaint of John Stewart (“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. CEI reserves the right to supplement or amend this Answer.

1. CEI denies all allegations related to CEI’s alleged failure to supply power in a reasonable manner.
2. CEI admits that the Complainant’s residence experienced two momentary power outages on August 4, 2018. CEI admits that Complainant’s residence also experienced a third, sustained power outage on August 4, 2018, and that power was restored on August 5, 2018, at or around approximately 12:00pm. CEI denies all other allegations related to the timing or duration of these power outages at Complainant’s residence. CEI lacks knowledge or information sufficient to respond

to the allegations regarding “other outages” at Complainant’s residence, and therefore denies the same.

3. CEI admits that Complainant called CEI twice on August 4, 2018 to report a power outage. CEI lacks knowledge or information sufficient to respond to the remaining allegations related to these telephone calls and therefore denies the same.
4. CEI lacks knowledge or information sufficient to respond to the allegations regarding the CEI repair crew and therefore denies the same.
5. CEI lacks knowledge or information sufficient to form a belief as to the truth of the allegation regarding the Complainant’s loss of food and therefore denies the same.

AFFIRMATIVE DEFENSES

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

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

Respectfully submitted

/s/ Emily V. Danford
Emily V. Danford (0090747)
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*Attorney for The Cleveland Electric
Illuminating 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 29th day of October 2018.

John Stewart
35680 Ridge Rd.
Willoughby, OH 44094

/s/ Emily V. Danford
*Attorney for The Cleveland Electric
Illuminating Company*

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in

Case No(s). 18-1531-EL-CSS

Summary: Answer of The Cleveland Electric Illuminating Company electronically filed by Ms. Emily V Danford on behalf of The Cleveland Electric Illuminating Company