

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

Dean A. Robinson,

Complainant,

v.

Ohio Power Company,

Respondent.

Case No. 18-1539-EL-CSS

ANSWER OF RESPONDENT OHIO POWER COMPANY

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 October 10, 2018:

ANSWER TO ALLEGATIONS

1. AEP Ohio admits that Complainant is a customer of AEP Ohio.
2. AEP Ohio admits that an underground service neutral serving Complainant’s house failed on August 26, 2018, that Complainant called the Company regarding the issue, AEP Ohio sent an employee to Complainant’s house to investigate the issue, and AEP Ohio found and replaced the failed neutral.
3. AEP Ohio admits that it is not responsible for any loss or damage to Complainant associated with the August 26, 2018 event and that it communicated as much to Complainant in correspondence dated September 7, 2018.
4. AEP Ohio denies all allegations regarding Complainant’s alleged loss, Complainant’s alleged communications with AEP Ohio employees, Complainant’s insurance status, and

Complainant's claimed damages for lack of information or knowledge sufficient to form a belief thereon.

5. 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. The Commission lacks subject matter jurisdiction to adjudicate Complainant's negligence claim.

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

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

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

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/ Christen M. Blend

Christen M. Blend (0086881)

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**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 30th day of October, 2018.

Dean A. Robinson
64520 Hidden Acres Rd.
Cambridge, Ohio 43725

Complainant

/s/ Christen M. Blend

Christen M. Blend

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

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in

Case No(s). 18-1539-EL-CSS

Summary: Answer - Answer of Respondent Ohio Power Company electronically filed by Ms. Christen M. Blend on behalf of Ohio Power Company