

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

Justin Palm,)
)
 Complainant,)
)
 v.) **Case No. 18-1563-EL-CSS**
)
 Ohio Power Company,)
)
 Respondent.)

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 Justin Palm filed in this proceeding on October 18, 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 in January 2015 for 13,573 kWh of usage. AEP Ohio avers that Complainant’s meter was incorrectly read and that Complainant’s billing was subsequently adjusted to 9,308 kWh.
3. AEP Ohio admits that Complainant’s bills for the months of December 2014 and January 2015 were based on actual readings.
4. AEP Ohio admits that it installed a new meter at Complainant’s residence on May 8, 2015. AEP Ohio denies that it did so at Complainant’s request or because Complainant’s previous meter was not functioning correctly. AEP Ohio avers that the new meter was installed as part of AEP Ohio’s deployment of automatic meter reading technology in Complainant’s area at that time.

5. AEP Ohio admits that it has initiated collections activities to collect the past due balance that Complainant owes to AEP Ohio.
6. AEP Ohio denies “altering” Complainant’s bills or charging Complainant “fraudulent” charges.
7. AEP Ohio denies Complainant’s allegations regarding Complainant’s use of electric heaters, how much electric heat Complainant used in the winter of 2015, and Complainant’s communications and “negotiations” with AEP Ohio representatives for lack of information or knowledge sufficient to form a belief thereon.
8. AEP Ohio denies Complainant’s allegations regarding usage amounts for which Complainant allegedly was charged on various months, which do not contain any reference to the year of the charges, and usage amounts for an unidentified house where “the meter was changed” for lack of information or knowledge sufficient to form a belief thereon.
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. The Commission lacks subject matter jurisdiction to adjudicate Complainant’s request that “AEP remove the debt from [his] record.”
3. AEP Ohio, at all times, complied with all applicable Ohio statutes; the Public Utilities Commission of Ohio’s (“Commission”) 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

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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 6th day of November, 2018.

Justin Palm
2591 Leonardsburg Road
Delaware, Ohio 43015

Complainant

/s/ Christen M. Blend

Christen M. Blend

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in

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