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17-1822-GA CSS

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FILE

FAX COVER PAGE

TO: The Public Utilities Commission of Ohio

ATTN: Kerry Sheets

FROM: Erin Dahl

RE: Motion for Continuance for Case Number - 17-1822-GA-CSS

PAGES: 6 pages including fax cover page

DATE: November 5, 2018

Fax: 614-752-8351

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BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

ERIN DAHL,

-Complainant

v.

THE EAST OHIO GAS COMPANY D/B/A
DOMINION ENERGY OHIO


-Respondent

Case No. 17-1822-GA-CSS

**IN REGARDS TO THE RESPONSE MADE BY THE COUNSEL FOR DOMINION EAST OHIO
FOR MY MOTION TO CONTINUE**

In accordance with Ohio Adm. Code 4901-1-12 and in response to my request for a hearing with the Public Utilities Commission of Ohio regarding fraudulent billing by Dominion East Ohio/East Ohio Gas Company, and two subsequent scheduled Meter Tests, for which they did not comply with any of the Ohio Revised Statutes that govern the protocol for the procedure, a hearing was ORDERED. A hearing was scheduled for August 30, 2018, at 10:00 a.m., in the Offices of the Commissions Hearing Room 11- A, 11th Floor, 180 E. Broad Street, Columbus, OH 43215-3793, the rescheduled for Thursday, October 11, 2018. I respectfully request a Motion for Continuance for the hearing scheduled on October 11, 2018, in Columbus, OH, and again was continued and is rescheduled for November 9, 2018. Good cause exists to grant my request for a Motion for a Continuance, which is set forth in the attached memorandum in support as required by OAC 4901-1-12. On November 2, 2018, the counsel for Dominion responded to and did not object to my request for a continuance of this case.

Respectfully,



Erin Dahl,
Complainant, Pro se
1901 W. Madison Street, Apt. 86
Phoenix, AZ 85009
Telephone: (216)-816-7989
E-mail: erindahl17@aol.com

FACTS

1. On August 22, 2017, I, Erin Dahl, filed my 3rd complaint with the Public Utilities Commission of Ohio in which I allege that Dominion East Ohio's billing for my gas service was both inaccurate and fraudulent. Prior to filing this 3rd complaint with the PUCO I scheduled two separate Meter Tests. During each of the scheduled tests the technician for Dominion did not follow the protocol which is governed and whose directives are detailed in the Ohio Revised Statutes and Administrative Codes.
2. A telephonic settlement conference was scheduled and took place on June 20, 2018, at 1:30 p.m., Eastern Time. All parties attended the telephonic conference, however, the parties could not agree upon a resolution.
3. A hearing in this matter was ordered and scheduled for August 30, 2018, at 10:00 a.m., in the offices of the Commission, Hearing Room 11_A, 11th Floor, 180 East Broad Street, Columbus, Ohio 43215-3793.
4. A hearing was rescheduled for November 9, 2018, for which I requested a Continuance showing good cause. On November 2, 2018, the counsel for Dominion Energy Ohio responded and did not oppose my request for a continuance.
5. On November 5, 2018 I responded to the counsel – Whittsturtevant, LLP's letter to the Public Utilities Commission of Ohio regarding this matter, agreeing to the dates that counsel suggested and other points stated in the response letter.

RESPONSE STATEMENT AND CONCLUSION

In the letter dated November 2, 2018, the counsel for Dominion East Ohio supported my request for a Continuance of the hearing scheduled for November 9, 2018 and requested for the hearing to be rescheduled for January 2019 or later. I support this request and ask the court to reschedule the hearing for January 2019.


Counsel made several statements in the letter, however, that are either untrue or inaccurate that need clarification for the record.

- Counsel states that my account is paid in full. I did not pay the account and the balance that Dominion stated was due as a result of the billing issues. I have asked on several occasions who paid this bill and Dominion has repeatedly refused to provide me with that information and the amount paid. The amount due/past due, is precisely what has been in question due to my allegations of fraudulent billing and the circumstances surrounding the 2 scheduled meter tests. If this amount was paid, as counsel claims, part of this case would be to seek reimbursement for that claim. As the bill was solely in my name, Dominion has no legal authority to pursue payment from family members, as they have previously stated occurred in previous motions and statements within this case.
- Counsel questioned my residency. I have residency in Ohio and outside of Ohio.
- Counsel addressed my claims of having not received documents from Dominion. This has been a long standing issue since September of 2017, and the issue has been addressed in the various PUCO motions on record. This has been the crux of several of the request for Motions to Continue the hearing. My request on November 1, 2018, for an additional Continuance is in response to these ongoing patterns by Dominion East Ohio in regards to providing either the requested information or the history/duplicate billing statements in question for this case.
- Counsel stated in the letter dated November 2, 2018, that DEO has mailed available bill copies to my listed address. I will review these upon receipt and if need be, will contact or follow up with counsel if additional billing statements are required or missing.

CONCLUSION

Pursuant to OAC 4901-1-12, I respectfully request a Motion for Continuance for the hearing scheduled for November 9, 2018. Good cause exists to grant my request for a Motion for a Continuance, and on November 2, 2018, the counsel for Dominion responded to this motion and did not object to my Motion for a continuance of this case and only requested for the hearing to be rescheduled for January 2019 or later, a request to which I do not object.

Respectfully,



Erin Dahl,
Complainant, Pro se
1901 W. Madison Street, Apt. 86
Phoenix, AZ 85009
Telephone: (216)-816-7989
E-mail: erindahl17@aol.com

CERTIFICATE OF SERVICE

CASE NUMBER: 17-1822-GA-CSS
CASE DESCRIPTION: Erin Dahl vs. Dominion East Ohio
DATE OF SERVICE: November 5, 2018
DOCUMENT SIGNED ON: November 5, 2018

This document titled Motion for Continuance has been served to all parties to the case by fax to the PUCO and by U.S. Mail for the PUCO Docketing Information System.

PARTY OF RECORD

ATTORNEY


Glover, Rebekah J. Ms.
Whitt Sturtevant
88 E. Broad Street
Suite 1590
Columbus, OH 43215
Phone: 937-417-3683
E-mail: glover@whitt-sturtevant.com

Miller, Vesta R
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, OH 43215
Phone: 617-466-7702
E-mail: vesta.miller@puc.state.ohio.us

Fischer, Mary E Ms.
Public Utilities Commission of Ohio
180 E. Broad Street
Columbus, OH 43215
Phone: (614)466-0469
E-mail: mary.fischer@puco.ohio.gov

ATTORNEY EXAMINER

Sheets, Kerry
Public Utilities Commission of Ohio
180 E. Broad Street
Columbus, OH 43215-3793

Respectfully

Erin Dahl,
Complainant, Pro se
1901 W. Madison Street, Apt. 86
Phoenix, AZ 85009
Telephone: (216)-816-7989
E-mail: erindahl17@aol.com