

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

MICHELLE DIFIORI)	
)	
Complainant,)	
)	Case No. 18-1608-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) of the Ohio Administrative Code, CEI for its answer to the Complaint of Michelle DiFiori (the “Complainant”) states:

Complainant’s Complaint consists of random assertions in unnumbered paragraphs. To the extent CEI does not respond to a specific allegation, CEI denies any such allegation. CEI reserves the right to supplement or amend this Answer.

1. CEI admits that the Complainant’s name, service address and CEI account number as listed in the Complaint are consistent with CEI’s records and that the Complainant is a CEI customer.
2. CEI admits that Complainant called CEI on July 17, 2018 claiming that her July 14, 2018 bill was high, and that CEI asked for and Complainant provided CEI with a reading of her meter during that telephone call. CEI admits that CEI’s customer service representative stated that Complainant’s meter had been misread. CEI admits that Complainant’s bill was adjusted and reissued in the amount of \$91.68

on July 18, 2018. CEI denies the remaining allegations regarding the July 17, 2018 telephone call.

3. CEI admits that Complainant called CEI on August 14, 2018 claiming that her August 11, 2018 bill from CEI was “higher than normal.” CEI admits that during that call, a CEI customer service representative transferred Complainant to a supervisor. CEI admits that during the telephone call with the supervisor, the supervisor advised Complainant that her July 17, 2018 bill from CEI was correct and that CEI’s adjustment of that bill on July 18, 2018 was in error.
4. CEI admits that the CEI customer service supervisor inquired about Complainant’s air conditioner during the August 14, 2018 telephone call.
5. CEI admits that Complainant called CEI on September 19, 2018 and that a supervisor issued Complainant a goodwill credit of \$43.61.
6. CEI admits that Complainant requested a refund of \$30 for the expense of having her HVAC inspected.
7. CEI admits that Complainant’s meter was replaced and that the old meter was tested and found to be accurate. CEI admits that Complainant was not present when her old meter was tested.
8. CEI admits that Complainant’s July 17, 2018 bill lists 1,565 KWH used, that Complainant’s August 14, 2018 bill lists 2,137 KWH used, and that Complainant’s September 14, 2018 bill lists 1,322 KWH used.
9. CEI admits that July 12, 2017 bills lists 920 KWH used, that Complainant’s August 10, 2018 bill lists 997 KWH used, and that Complainant’s September 12, 2017 bill lists 873 KWH used.

10. CEI denies that it is overcharging the Complainant.
11. CEI lacks knowledge or information sufficient to respond to the remaining allegations in the Complaint, and therefore denies the same.

AFFIRMATIVE DEFENSES

12. The Complaint fails to set forth reasonable grounds for Complaint, as required by Section 4905.26, Revised Code.
13. The Complaint fails to state a claim upon which relief can be granted.
14. The Commission lacks subject matter jurisdiction over some or all of Complainant's claims.
15. 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)
Counsel of Record
FIRSTENERGY SERVICE COMPANY
76 South Main Street
Akron, OH 44308
(330) 384-5849
edanford@firstenergycorp.com

*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 14th day of November 2018.

Michelle DiFiori
3427 Norris Ave.
Parma, Ohio 44134

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

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in

Case No(s). 18-1608-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