

FILE

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- 445 -

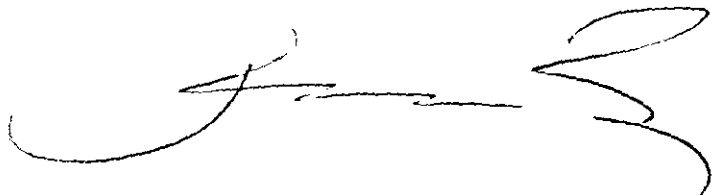
CASE NO 18 ~~455~~-EL-CCJ

Ricardo Lee
PUCO Documents
1305 12y/And an
Cinemat. Etc 45237
513-1740-2405

PUCO Documents Dept

November 29th 2018

My name is Ricardo Lee I would
like this motion in opposition to
be filed at this time thanks



RECEIVED-SOCKETING DIV

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PUCO

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THE PUBLIC UTILITIES COMMISSION OF OHIO

IN THE MATTER OF THE : CASE NO 18-455-EL-CSS
COMPLAINT OF :
RICARDO GARNELL LEE :

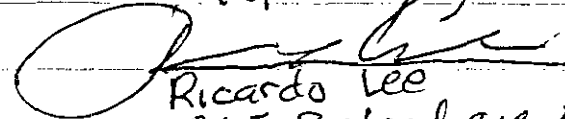
COMPLAINANT, : REQUEST FOR THE PRODUCTION
OR DISCOVERY OF DOCUMENTS
VS :

DUKE ENERGY, OHIO INC :

RESPONDENT. :

Now comes the complainant, Ricardo G. Lee acting pro'se and does hereby respectfully moves to submit his request for the production or discovery or production of documents from the respondents Duke Energy of Ohio Inc., and the hamilton County Community action agency (P.p.p.) program, The complainant hereby states that the documentation and records requested are of vital importance to the complainants case for the purpose of coming to a fair and impartial resolution and conclusion in this matter respectfully as follows in the attached memorandum.

Respectfully,


Ricardo Lee
1305 Ryland ave Apt 1
cincinnati, Ohio 45231
513 780-2805

COMPLAINTS MEMORANDUM IN SUPPORT OF HIS
REQUEST OR DISCOVERY OF DOCUMENTS OR RECORDS

The complainant Ricardo G. Lee herein respectfully submits this request for the production and/or in-camera inspection and discovery of documentary evidence that's being withheld and not being given to the complainant after numerous requests by the complainant to Duke Energy Inc. and The Hamilton County Community Action Agency and the PIPP program associates herein. Duke Energy is contending that they can only go back as far as 3 years from the date of a request made for the production of account numbers, final utility bills, and total overall amounts owed to Duke Energy for the use of gas and electricity used by its consumers. Which in turn is unfair and unconstitutional under the circumstances of this case complaint now being heard before the Ohio public utilities commission herein respectfully by law, because the complainant repeatedly made every attempt possible within his power to consult with Duke representatives to plead his case and side of the story with respect to his dispute of Duke Energy forcing the complainant to have to pay thousands of dollars in gas and electric charges and arrearages which the complainant never used which is actually fraudulent

(2)

COMPLAINTS MEMORANDUM IN SUPPORT OF HIS
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The complainant Ricardo G. Lee herein respectfully submits this request for the production and/or in-camera inspection and discovery of documentary evidence that's being withheld and not being given to the complainant after numerous requests by the complainant to Duke Energy Inc, and The hamilton County Community Action Agency and the pipp program associates herein. Duke Energy is contending that they can only go back as far as 3 years from the date of a request made for the production of account numbers, final utility bills, and total overall amounts owed to duke energy for the use of gas and electricity used by its consumers. Which inturn is unfair and unconstitutional under the circumstances of this case complaint now being heard before the Ohio public utilities commission herein respectfully by law, because the complainant repeatedly made every attempt possible within in his power to consult with duke representatives to plead his case and side of the story with respect to his dispute of duke energy forcing the complainant to have to pay thousands of dollars in gas and electric charges and arrearages which the complainant never used which is actually fraudulent

(2)

in compliance with department policies and procedures and state guidelines because, the pipp program is governed by law so fundamental fairness require C.A.A to disclose any information in regards to any client or former client who has applied or attempted to apply for the pipp program.

Under the circumstances and evidence and facts of this case the hamilton County Community Action agency is undermining the integrity of the pipp program and its policies by denying me services or relief in regards to becoming or attempting to become a pipp customer when the are fully aware that not only am I disabled but the complainant is also low income and below being poor based on complainants income and subsidized housing situation. Also C.C.A Knew that the complainant opted out of his last stint with being a pipp customer and only had arrearage of \$1,25.00 total which the complainant had already paid the arrearage in full. Which in turn by the hamilton County community action agency discriminates against the complainant by H.C.C.A.A continuing to deny the complainant services as a poor and disabled individual, and without the assistance of the pipp program the complainant could not pay the substantial arrearage and fraudulent duke charges. Thereby forcing the complainant into homelessness

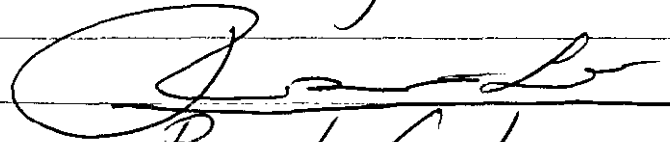
(4)

because according to the complaintant's living arrangements as a subsidized housing consumer requires the complaintant to have utilities in his name. Thus far as a matter of fundamental fairness the complaint respectfully request the Duke energy and The hamilton county Community Action Agency disclose any and all evidence and records dating back from the first time and the very last time the complaint ever applied for the papp program and account numbers as well as final bills every time the complaint applied for papp, rather if the complaintant was denied or approved in order to come up with a proper calculation of funds owed to duke energy. Otherwise its an unfair and discriminatory practices by C.A.A denying the complaintant access to papp services, and duke energy forcing the complaintant to have to pay fraudulent charges without a complete and impartial process supported by facts and evidence supported by the records. Therefore the complaintant respectfully request that Duke energy and C.A.A disclose all the evidence requested dating back from the first time the complaintant ever applied for services from duke or assistance from papp respectively. otherwise its not fair to impose the substantial amount owed to duke when in fact

the complainant has clearly disputed the amount owed to duke and duke refuses to remedy the situation for clarity in the matter.

In the meantime the complainant hereby respectfully request that this Ohio public utilities commission compel duke and the C.P.A. to disclose any and all records under the complainant's full name, address and social security number and Date of Birth herein. To insure a fair and proper resolution in this matter

Respectfully submitted



Ricardo G. Lee
1305 Ryland ave Apt 3
Cincinnati, Ohio 45237
513 780-2805

Daniel Fulin
P.U.C.O
And

Counsel for Duke Energy

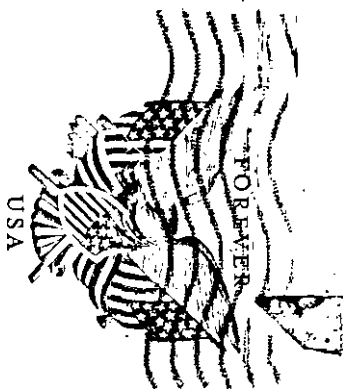
Certificate of Service

The complaint served all parties by mail on
Nov. 26, 2018

Records Lee
1305 Raymond Ave
Apt 1
Cincinnati Ohio 45237

43215-376304

CINCINNATI OH 45204
30 NOV 2018 PM 2 L



Ohio Public Utilities Commission
Documents Dept
180 E. Broad St
Columbus, Ohio 43215
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