

FILE  
**FAX**

8

FAX COVER PAGE

TO: THE PUBLIC UTILITIES COMMISSION OF OHIO  
FROM: ERIN DAHL  
CASE: 17-1822-GA-GAS<sup>CSS</sup>  
DATE: February 21, 2019  
PAGES: 6 including Cover Page  
FAX: 614-752-8351

RECEIVED-DOCKETING DIV

2019 FEB 22 PM 12: 01

PUCO

This is to certify that the images appearing are an  
accurate and complete reproduction of a case file  
document delivered in the regular course of business.  
Technician fe Date Processed 2/22/19

**BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO**

ERIN DAHL,

-Complainant/Plaintiff

v.

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

-Respondent/Defendant

Case No. 17-1822-GA-CSS

RECEIVED-DOCKETING DIV  
2019 FEB 22 PM 12:01  
PUCO

**MOTION FOR CONTINUANCE**

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 is scheduled for February 25, 2019 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. I am postponement of the court of two-weeks due to a theft that occurred over the weekend. 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.

Respectfully,



Erin Dahl, Plaintiff-Pro se  
1901 W. Madison Street, Apt. 86  
Phoenix, AZ 85009

Contact: (216)816-7989/erindahl17@aol.com

or:

P.O. Box 21325  
South Euclid, OH 44121

## **FACTS and MOTION REQUEST**

1. On August 22, 2017, I, Erin Dahl filed my 3<sup>rd</sup> complaint with the Public Utilities Commission of Ohio, in which I allege that Dominion East Ohio's billing for my gas service, which was both inaccurate and fraudulent. Prior to filing this 3<sup>rd</sup> 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 to the case 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, 11<sup>th</sup> Floor, 180 East Broad Street, Columbus, Ohio 43215-3793.
4. Due to both court obligations in Arizona, which was scheduled for October 8, 2018, and Dominion Gas Company's refusal to issue my billing statements, which were/are needed for the PUCO hearing, a Motion for Continuance was filed and granted by the PUCO court. The hearing was now rescheduled for November 9, 2018.
5. I returned to Cleveland on October 28, 2018, for my job here, the pending legal issues, which include the PUCO hearing and to be with my Mother. Upon my return I had still not received the promised billing statements from Dominion or it's legal counsel. Due to that, I immediately filed for a Continuance for the November 9, 2018 hearing, which is also the date my Mother unexpectedly passed away.
6. On Novemeber 2, 2018, Andrew Campbell of Whitt-Sturtevant, responded to my request by addressing a letter to the PUCO court. In the letter he did not object to my request for a Continuance, and only requested that the hearing be scheduled for January or later. He also responded to the fact stated in my Motion for Continuance, that he mailed the billing statements that I had been requesting from Dominion for over a year, but had never received, despite Dominion's and the counsel for Whitt-Sturtevant's repeated claims that they were sent to me. The PUCO granted my request for a Continuance and rescheduled the hearing for January 31, 2019.
7. On December 18, 2018, I filed a Motion with the PUCO requesting for the court to order the release of the billing statements. Despite Andrew Campbell's claim on November 2, 2019, that he mailed them, I still had not received them as of that date, and need(ed) them to prepare for the hearing. Scheduled for January 31, 2019. Rebekah Glover of Whitt-Sturtevant responded to my

motions by e-mail. I filed her responses and our correspondences on January 4, 2019 and January 8, 2019, in which she claimed that she was mailing the requested documents/billing statements.

8. On January 12, 2019, I finally received the Dominion billing statements to my P.O. Box in South Euclid, Ohio, for which I had been requesting for over a year. Due to this delay, caused by *Dominion's and it's legal counsel's repeated refusal to issue these statements despite their repeated claims*, and I have not had adequate time to prepare for the hearing in the 2 and a half week time-frame which remains before the hearing, caused by these unnecessary and deliberate delays of not having access to the billing statements.
9. As Good Cause exists(ed), and I filed and was granted a continuance which rescheduled the hearing for Monday, February 25, 2019.
10. On Saturday, February 16, 2019, I was the victim of a theft. The case is being handled with the South Euclid Heights Police in Cleveland, OH. This theft has caused an undue hardship on both my transportation and finances, both of which impact the trip to Columbus for this hearing. As such, I am requesting for the court to delay the hearing by two-weeks, while this issue is resolved and my property recovered, which is in the process but will not be resolved by tomorrow, Friday, February 22, 2019, despite my efforts with the Police to do so. As good cause exists, I respectfully request the court postpone and reschedule the hearing for 2 weeks (March 11, 2019).

Respectfully submitted (February 21, 2019)



Erin Dahl, Complainant – Pro se  
1901 W. Madison Street, Apartment 86  
Phoenix, AZ 85009  
Phone: (216)816-7989  
E-mail: [erindahl17@aol.com](mailto:erindahl17@aol.com)

or

P.O. Box 21325  
South Euclid, OH 44121

## **CERTIFICATE OF SERVICE**

**CASE NUMBER:** 17-1822-GA-CSS

**CASE DESCRIPTION:** Erin Dahl vs. Dominion East Ohio

**DATE OF SERVICE:** February 21, 2019

**DOCUMENT SIGNED ON:** February 21, 2019

This document titled Motion for Continuance has been served to all parties to the case by fax to the PUCO for filing with 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

**CERTIFICATE OF SERVICE**

**CASE NUMBER:** 17-1822-GA-CSS

**CASE DESCRIPTION:** Erin Dahl vs. Dominion East Ohio

**DATE OF SERVICE:** February 21, 2019

**DOCUMENT SIGNED ON:** February 21, 2019



Erin Dahl, Complainant Pro se

Erin Dahl, Complainant – Pro se  
1901 W. Madison Street, Apartment 86  
Phoenix, AZ 85009  
Phone: (216)816-7989  
E-mail: [erindahl17@aol.com](mailto:erindahl17@aol.com)

P.O. Box 21325  
South Euclid, OH 44121

**\*\* SENDING NOTIFICATION : FAX SENT SUCCESSFULLY \*\***

TIME SENT  
February 21, 2019 at 1:18:50 PM EST

REMOTE CSID

DURATION  
146

PAGES  
7

STATUS  
Sent

**FROM**

**TO**

Name:

Phone:

Fax:

16147528351

E-mail: seu2@cuyahogalibrary.org

Sent: 2/21/19

at: 1:16:24 PM

7 page(s) (including cover)

Subject:

Comments:

See back of receipt for your chance  
to win \$1000 ID #:7N4Y68TL215

**Walmart** \*

**SUPERCENTER**

216-382-1657 Mgr:ASHLEY BUSSARD

ST# 02362	OP# 006627	TEM 04	TR# 06221	
BU CLASS	COF 007874206668	F		4.93 B
CAL	PDLK 072001800015			16.96 X
HF BF	PLSKA 064450093904	F		2.77 D
FAJ	CHICKEN 003469512362	F		5.78 D
COTY	CLM 6HR 003600047747			6.22 X
GLASS	CLEANER 007874222196			0.98 X
GLASS	CLEANER 007874222196			0.98 X
HZLMT	CREAMR 007874214787	F		3.66 D
26L	SCHFRHVN 003867530617			168.08 X

SUBTOTAL 210.28

TAX 1 A.000 15.45

TOTAL 225.73

DEBIT TEND 225.73

CHANGE DUE 0.00

EFT DEBIT PAY FROM PRIMARY

225.73 TOTAL PURCHASE

US DEBIT \*\*\*\* \* 1446 I 0

REF # 904800016575

NETWORK ID. 0056 APPR CODE 178697

US DEBIT

ATD A0000000980840

TC C8866998A1321F69

\*Pin Verified

TERMINAL # SC010611

02/17/19 09:51:36

# ITEMS SOLD 9

TC# 6859 6862 6717 6941 9260 4



Low Prices You Can Trust. Every Day.

02/17/19 09:51:43

Scan with Walmart app to save receipts



**SOUTH EUCLID  
POLICE**

(216) 381-1234

RPT# 190330

Copies of reports available through  
the records department.

Monday-Friday

8:00AM - 4:00PM

*PTZ Patrick #14*

**SOUTH EUCLID  
POLICE**

(216) 381-1234

RPT# JPATRICK@SEPOLICE

Copies of reports available through  
the records department.

Monday-Friday

8:00AM - 4:00PM

*216 472-7638*