

**BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO**

Ohio Power Company  
700 Morrison Rd  
Gahanna, OH 43230,

Complainant,

v.

**Case No. 19-872-EL-CSS**

Energy Advisors  
8575 Beechmont Ave., Suite 202  
Cincinnati, OH 45255,

and

John Does 1-20  
True names unknown  
True addresses unknown

Respondents.

**ANSWER OF ENERGY ADVISORS LLC**

Respondent Energy Advisors LLC responds as follows:

Paragraph 1 requires no response.

Paragraph 2: Energy Advisors LLC denies engaging in activities that include arranging for the supply of competitive retail electric generation service to customers in Ohio.

Paragraph 3: Energy Advisors LLC denies being legally responsible for the unlawful actions described in the Complaint.

Paragraph 4: Requires no response.

Paragraph 5: Requires no response.

Paragraph 6: Requires no response.

Paragraph 7: Energy Advisors LLC denies the allegations in this paragraph in full. Further, Energy Advisors LLC does not currently have nor has Energy Advisors LLC ever had a webpage or a toll-free number.

Paragraph 8: As stated in the response to paragraph 7, Energy Advisors LLC denies creating the solicitation or having the means to do so (a webpage). Consequently, Energy Advisors LLC has no knowledge of responses to a solicitation it did not create.

Paragraph 9: Energy Advisors LLC denies creating or sending a solicitation to AEP customers. The first time Energy Advisors LLC became aware of the solicitation, marked in the complaint as exhibit B, was when Energy Advisors LLC viewed the complaint.

Paragraph 10: Energy Advisors LLC denies claiming that AEP Ohio customers' electric rates are increasing by over 45% as compared to their current per-kWh rate. In addition, see responses for Paragraphs 7 and 9.

Paragraph 11: Energy Advisors LLC denies stating customers can call Energy Advisors to lock in a lower rate that will not change. In addition, see responses for Paragraphs 7 and 9.

Paragraph 12: Energy Advisors LLC denies featuring the AEP Ohio name and corporate logo in any solicitation. In addition, see responses for Paragraphs 7 and 9.

Paragraph 13: Energy Advisors LLC did not receive a cease-and-desist letter from AEP Ohio or anyone else.

Paragraph 14: Energy Advisors LLC agrees it is not certified by the Commission to provide CRES to customers in Ohio. Energy Advisors LLC also states it has not provided CRES to customers in Ohio.

Paragraph 15: Energy Advisors LLC denies having been involved in any preparation or transmission of the solicitation. Energy Advisors LLC denies participating in the "other actions as described above" as stated in the complaint. In addition, see responses for Paragraphs 7 and 9.

Paragraph 16: Requires no response.

Paragraph 17: Energy Advisors LLC denies soliciting electric customers on behalf of AEP Ohio. Further, Energy Advisors LLC denies soliciting electric customers on behalf of AEP Ohio by using the Company's corporate logo. In addition, see responses for Paragraphs 7 and 9.

Paragraph 18: Requires no response.

Paragraph 19: Requires no response.

Paragraph 20: Energy Advisors LLC denies representing that it is soliciting on behalf of AEP Ohio by using the Company's logo and further denies being in violation of Ohio Adm. Code 4901:1-21-05(C)(10). In addition, see responses for Paragraphs 7, 9, and 17.

Paragraph 21: Requires no response.

Paragraph 22: Energy Advisors LLC denies representing to anyone that AEP Ohio's rates would increase by over 45%. In addition, see responses for Paragraphs 7, 9, 17, and 20.

Paragraph 23: Energy Advisors LLC denies including a false assertion in a solicitation. In addition, see responses for Paragraphs 7, 9, 17, 20, and 22.

Paragraph 24: Energy Advisors LLC denies creating a false assertion in a solicitation which constitutes misleading, deceptive or unconscionable sales and marketing practice in violation of Ohio Adm. Code 4901:1-21-03(A) and R.C. 4928.10. In addition, see responses for Paragraphs 7, 9, 17, 20, and 23.

Paragraph 25: Requires no response.

Paragraph 26: Energy Advisors LLC denies violating R.C. 4928.08(B).

Paragraph 27: Energy Advisors LLC denies violating R.C. 4928.08(B). Energy Advisors LLC denies violating Ohio Adm. Code 4901:1-21-03(A).

Energy Advisors LLC is a single member LLC formed in October of 2018. Energy Advisors LLC is one of 36 business entities in Ohio containing the words “Energy Advisors” in their names. The internet web solicitation alleged in the Ohio Power Company complaint could have originated from anywhere in the world from anyone wishing to call themselves “Energy Advisors”. The wrong “Energy Advisors” has been named in the complaint. Further, Energy Advisors LLC requests the PUCO order the Complainant to cancel the complaint until the Complainant can more specifically identify and locate the appropriate “Energy Advisors”, or at the very least, amend the complaint to delete any reference to Energy Advisors “with its principal place of business in Cincinnati Ohio”. Energy Advisors LLC prays for the Commission’s consideration of this request before any further impairment of current or future business prospects of Energy Advisors LLC can occur.

Respectfully Submitted,  
/s/ John Deeds

**CERTIFICATE OF SERVICE**

I certify that the foregoing Answer was filed electronically through the Docketing Information System of the Public Utilities Commission of Ohio on this 30th day of April, 2019. The PUCO’s e-filing system will electronically serve notice of the filing of this document on counsel for Ohio Power Company.

/s/ John Deeds

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**4/30/2019 3:23:06 PM**

**in**

**Case No(s). 19-0872-EL-CSS**

Summary: Answer Answer with Case Caption electronically filed by Mr. John Deeds on behalf of Energy Advisors LLC