

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

|                                   |   |                         |
|-----------------------------------|---|-------------------------|
| In the Matter of the Complaint of | ) |                         |
| Darlene Bright and Tony Todd,     | ) |                         |
| Complainants,                     | ) |                         |
| v.                                | ) | Case No. 19-2023-GA-CSS |
|                                   | ) |                         |
| Columbia Gas of Ohio, Inc.,       | ) |                         |
| Respondent.                       | ) |                         |

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**ANSWER OF COLUMBIA GAS OF OHIO, INC.**

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Now comes the Respondent, Columbia Gas of Ohio, Inc. ("Columbia"), and files its Answer to the Complaint filed herein on November 8, 2019.

1. Columbia is without sufficient knowledge or information to form a belief as to the truth of the averments set forth in the Complaint and the Attachments to the Complaint.

**Affirmative Defenses**

2. Columbia avers that the Complaint does not comply with the Commission's rules requiring a "statement which clearly explains the facts." Ohio Admin. Code 4901-9-01(B). The Complaint is not in numbered paragraph form and contains opinions and irrelevant facts rather than specific allegations. As such, Columbia has been left to speculate as to the specific allegations in order to respond as required. Columbia reserves the right to amend its Answer in the event it has incorrectly understood the allegation in the Complaint.
3. Columbia avers that the Complainant has failed to state reasonable grounds for a complaint against Columbia as required by Ohio Revised Code § 4905.26.

4. Columbia avers that the Complainant has failed to state a claim for which relief can be granted.
5. Columbia avers that it has complied with all applicable Ohio statutes, the Commission's rules and regulations and Columbia's tariff.
6. Columbia avers the Complainant is estopped from raising the issues in the Complaint as the Complainant previously agreed to a satisfactory resolution of the matters in the Complaint.
7. Columbia reserves the right to raise other defenses as warranted by discovery in this matter.

Respectfully submitted by,

**COLUMBIA GAS OF OHIO, INC.**

/s/ Joseph M. Clark

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## CERTIFICATE OF SERVICE

The Public Utilities Commission of Ohio's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the service list of the docket card who have electronically subscribed to the case. In addition, the undersigned hereby certifies that a copy of the foregoing document is also being served via ordinary U.S. Mail, postage prepaid on the 26th day of November, 2019 upon the parties listed below.

/s/ Joseph M. Clark  
Joseph M. Clark

**Attorney for  
COLUMBIA GAS OF OHIO, INC.**

Darlene Bright and Tony Todd  
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**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**11/26/2019 10:33:55 AM**

**in**

**Case No(s). 19-2023-GA-CSS**

Summary: Answer to Complaint electronically filed by Cheryl A MacDonald on behalf of Columbia Gas of Ohio, Inc.