

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

JOHN SHREVE	)	
	)	
Complainant,	)	
	)	Case No. 20-402-EL-CSS
v.	)	
	)	
OHIO EDISON COMPANY	)	
	)	
Respondent.	)	

**ANSWER OF OHIO EDISON COMPANY**

In accordance with Rule 4901-9-01(D), Ohio Administrative Code, Respondent Ohio Edison Company (“Ohio Edison” or “the Company”) and for its answer to the Complaint of John Shreve (“Complainant”) states:

The Complaint consists of two unnumbered pages: the complaint form and a typewritten page consisting of several unnumbered paragraphs. To the extent the Company can discern the nature of an allegation, the Company will respond to such allegation.

**FIRST DEFENSE**

1. In response to the first page in the Complaint, the Company admits that Complainant receives electric service at 4461 Oberlin Avenue, Suite 102, Lorain, Ohio (“Property”), under account number 110111061799.

2. In response to the allegations set forth in unnumbered page 2, Paragraph 1, the Company admits that Complainant is the customer of record at the Property. Ohio Edison denies the remaining allegations for lack of knowledge as to their truth.

3. In response to the allegations set forth in unnumbered page 2, Paragraph 2, the Company denies the allegations set forth for lack of knowledge as to their truth.

4. In response to the allegations set forth in unnumbered page 2, Paragraph 3, the Company admits that it was contacted by the Public Utilities Commission of Ohio (“Commission”) regarding an informal complaint by Complainant, and that the Company responded to the Commission’s inquiry. Ohio Edison denies the remaining allegations set forth for lack of knowledge as to their truth.

5. In response to the allegations set forth in unnumbered page 2, Paragraph 4, the Company denies that Complainant paid “around \$1500,” and denies the remaining allegations set forth for lack of knowledge as to their truth.

6. In response to the allegations set forth in unnumbered page 2, Paragraph 5, the Company denies the allegation set forth for lack of knowledge as to their truth.

7. In response to the allegations set forth in unnumbered page 2, Paragraph 6, the Company denies overcharging Complainant. The Company denies the remaining allegations set forth for lack of knowledge as to their truth.

### **AFFIRMATIVE DEFENSES**

#### **SECOND DEFENSE**

8. The Complaint fails to set forth reasonable grounds for a complaint, as required by R.C. 4905.26.

#### **THIRD DEFENSE**

9. The Complaint fails to state a claim upon which relief can be granted.

#### **FOURTH DEFENSE**

10. Ohio Edison at all times complied with Ohio Revised Code Title 49; the applicable rules, regulations, and order of the Public Utilities Commission of Ohio; and Tariff,

PUCO No. 11, on file with the Public Utilities Commission of Ohio. These statutes, rules, regulations, orders, and tariff provisions bar Complainant's claims.

#### **FIFTH DEFENSE**

11. The Complaint states the Complainant uses the Property to store items that he sells on-line, suggesting that he is operating as a business there. As such, pursuant to 4901-1-08(A), Ohio Adm. Code, the customer can only appear before the Public Utilities Commission of Ohio represented by a licensed attorney ("Corporations must be represented by an attorney-at-law").

#### **SIXTH DEFENSE**

12. Ohio Edison reserves the right to raise other defenses as warranted by discovery in this matter.

WHEREFORE, Ohio Edison respectfully requests an Order dismissing the complaint and granting Ohio Edison all other necessary and proper relief.

Respectfully submitted,

/s/ Robert M. Endris  
Robert M. Endris (#0089886)  
Counsel of Record  
FirstEnergy Service Company  
76 South Main Street  
Akron, Ohio 44308  
Phone: 330-384-5728  
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On behalf of Ohio Edison Company

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Answer was served by electronic mail and U.S. mail to the following person on this 16th day of March, 2020.

John Shreve  
4461 Oberlin Ave., Suite 102  
Lorain, OH 44089  
[jshreve@elkandelk.com](mailto:jshreve@elkandelk.com)

/s/ Robert M. Endris  
Attorney for Ohio Edison Company

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Summary: Answer Answer of Ohio Edison Company electronically filed by Mr Robert M Endris  
on behalf of Ohio Edison Company