

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

LA'TEALA ALLISON,)	
)	
Complainant,)	
)	
v.)	Case No. 20-929-EL-CSS
)	
ATLANTIC ENERGY MD, LLC,)	
)	
Respondent.)	

**ANSWER OF RESPONDENT,
ATLANTIC ENERGY MD, LLC**

Pursuant to O.A.C. 4901-9-01(B), the Respondent, Atlantic Energy MD, LLC ("Atlantic Energy" or "Company"), by and through its attorneys, hereby answers the allegations of the Formal Complaint, dated April 23, 2020, ("Complaint") of the Complainant, Ms. La'Teala Allison as follows:

ANSWER TO ALLEGATIONS

1. The Complaint is not in a form allowing for specific admissions or denials as to the truth of the matter asserted. Accordingly, Atlantic Energy generally denies all allegations set forth in the Complaint. By way of further Answer, Atlantic has been in communication with Ms. Allison to attempt to resolve her concerns, and believes that the complaint can be fully resolved in the near future

2. To the extent the Complainant alleges such, Atlantic Energy further denies that its actions were in violation of any applicable law, regulation, or order of the Public Utilities Commission of Ohio.

3. To the extent that the Complaint contains additional allegations, Atlantic Energy denies such allegations.

AFFIRMATIVE DEFENSES

1. Atlantic Energy avers that the Complainant has failed to state reasonable grounds for a complaint as required by R.C. 4905.26 and O.A.C. 4901-9-01.

2. Atlantic Energy avers that the Complainant has not requested any relief that can be granted by the Public Utilities Commission of Ohio.

3. Atlantic Energy reserves the right to amend this Answer to assert any additional defenses, as necessary.

WHEREFORE, having fully responded to the Complaint, Atlantic Energy respectfully requests that the Public Utilities Commission of Ohio dismiss this Complaint with prejudice and grant Atlantic Energy all other necessary proper relief.

Respectfully submitted,

STEVENS & LEE



Michael A. Gruin
Linda R. Evers
Ohio Attorney ID No: 0062554
STEVENS & LEE
17 N. 2nd St., 16th Floor
Harrisburg, PA 17101
Tel. (717) 255-7366
Fax (610) 236-4177
mag@stevenslee.com
COUNSEL FOR ATLANTIC ENERGY MD, LLC

DATE: June 22, 2020

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

LA'TEALA ALLISON,
Complainant,
v.
ATLANTIC ENERGY MD, LLC,
Respondent.

Case No. 20-929-EL-CSS

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing Answer upon the party listed below on this 22nd day of June 2020:

VIA First Class U.S. Mail

La'Teala Allison
1462 Colburn Street
Toledo, OH 43609

Michael A. Grunin

Michael A. Gruin

DATED: June 22, 2020

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

6/19/2020 3:17:31 PM

in

Case No(s). 20-0929-EL-CSS

Summary: Answer electronically filed by Mr. Michael A Gruin on behalf of Atlantic Energy MD, LLC