

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Complaint of)	
)	
Rick Cunningham,)	Case No. 20-1286-GA-CSS
Complainant,)	
v.)	
)	
Columbia Gas of Ohio, Inc. and/or TC)	
Energy,)	
Respondent.)	

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

Now comes the Respondent, Columbia Gas of Ohio, Inc. ("Columbia"), and files its Answer to the Complaint filed herein on July 15, 2020.

1. Columbia denies the allegations set forth in the Complaint.

Affirmative Defense

2. Columbia avers that TC Energy, not Columbia, is the proper respondent of the Complaint. Because Columbia is not the proper respondent, this Complaint as it relates to Columbia is not properly before the Commission pursuant to R.C. 4905.26.

3. Columbia avers that the Complaint does not comply with the Commission's rules requiring a "statement which clearly explains the facts." Ohio Adm.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 allegations in the Complaint.

4. Columbia avers that the Complainant has failed to state reasonable grounds for a complaint against Columbia as required by R.C. 4905.26.

5. Columbia avers that the Complainant has failed to state a claim for which relief can be granted.

6. Columbia avers that it has complied with all applicable Ohio statutes, the Commission's rules and regulations, and Columbia's tariff.

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 4th day of August, 2020 upon the parties listed below.

/s/ Joseph M. Clark

Joseph M. Clark

Attorney for

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in

Case No(s). 20-1286-GA-CSS

Summary: Answer of Columbia Gas of Ohio, Inc. electronically filed by Ms. Melissa L. Thompson on behalf of Columbia Gas of Ohio, Inc.