

**BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO**

<b>Michael &amp; JoAnn Cooper,</b>	)	
	)	
<b>Complainants,</b>	)	
	)	
<b>v.</b>	)	<b>Case No. 20-1458-EL-CSS</b>
	)	
<b>Ohio Power Company,</b>	)	
	)	
<b>Respondent.</b>	)	

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**ANSWER OF RESPONDENT OHIO POWER COMPANY**

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Pursuant to Rule 4901-9-01(B) of the Ohio Administrative Code, Ohio Power Company (“AEP Ohio” or the “Company”) hereby responds as follows to the allegations contained in the Complaint that Complainants Michael and JoAnn Cooper filed in this proceeding on September 1, 2020:

**ANSWER TO ALLEGATIONS**

1. AEP Ohio admits that Complainants are customers of AEP Ohio.
2. AEP Ohio admits the Complainants contacted the Company regarding alleged electric service reliability issues at their residence.
3. AEP Ohio admits that it has upgraded equipment on the circuit that serves the Complainants’ residence. Specifically, the Company avers that it has replaced approximately 24 cutouts, 25 arresters, 2 poles, 2 crossarms, 1 primary jumper, and 3 transformers along the circuit since 2016. The Company most recently completed tree trimming along the circuit in 2017, and the circuit is scheduled for tree trimming in 2021.
4. AEP Ohio admits that it denied Complainants’ property damage claim related to an oven Complainants allege was damaged during a purported outage.

5. AEP Ohio admits that Complainants have attached multiple exhibits that purport to be a list of outages at Complainants' service address, invoices from "Central Ohio Appliance Repair" and "Countryside Electric Inc.", emails between Complainants and Commission Staff, an email from Complainants to Company personnel, and a "Customer Outage History Report". AEP Ohio denies the authenticity, accuracy, and relevance of all attachments to the Complaint for lack of information and knowledge to form a belief thereon.

6. AEP Ohio denies that Complainants experienced 46 outages in 2019. AEP Ohio further denies that Complainants have experienced 35 outages so far in 2020.

7. AEP Ohio denies that it would be appropriate relief for the Public Utilities Commission of Ohio (the "Commission") to impose fines on the Company related to Complainants' alleged service interruptions.

8. AEP Ohio denies Complainants' allegations related to alleged conversations, or lack thereof, with Commission Staff for lack of information and knowledge sufficient to form a belief thereon.

9. AEP Ohio denies each and every remaining allegation set forth in the Complaint.

#### **AFFIRMATIVE DEFENSES**

1. AEP Ohio avers that Complainants have failed to state reasonable grounds for a complaint as required by R.C. 4905.26.

2. AEP Ohio, at all times, complied with all applicable Ohio statutes; the Commission's rules, regulations, and orders; and AEP Ohio's tariff.

3. The Commission lacks subject matter jurisdiction to award damages related to the Complainants' property damage claim. The Commission further lacks subject matter jurisdiction to grant the requested relief.

4. AEP Ohio provided reasonable and adequate service to Complainants at all times relevant.
5. AEP Ohio reserves the right to raise additional affirmative defenses as warranted as this matter proceeds.

**WHEREFORE**, having fully responded to the Complaint, Respondent Ohio Power Company respectfully requests that the Public Utilities Commission of Ohio dismiss the Complaint with prejudice and grant the Company all other necessary and proper relief.

Respectfully submitted,

/s/ Tanner S. Wolffram

Christen M. Blend (0086881), Counsel of Record

Tanner S. Wolffram (0097789)

American Electric Power Service Corporation

1 Riverside Plaza, 29th Floor

Columbus, Ohio 43215

Telephone: (614) 716-1915

Facsimile: (614) 716-2950

E-mail: [cmbblend@aep.com](mailto:cmbblend@aep.com)

[tswolffram@aep.com](mailto:tswolffram@aep.com)

(willing to accept service by e-mail)

**Counsel for Respondent  
Ohio Power Company**

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and accurate copy of the foregoing was served upon Complainants at the address listed below by regular U.S. mail, postage prepaid, on this 21st day of September, 2020.

Michael & JoAnn Cooper  
4200 Pine View Dr.  
Galena, Ohio 43021

**Complainants**

/s/ Tanner S. Wolfram  
Tanner S. Wolfram

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

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Summary: Answer - Answer of Respondent Ohio Power Company electronically filed by  
Tanner Wolfram on behalf of Ohio Power Company