

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Complaint of Nina R. Jones,	)	
	)	
Complainant	)	Case No. 21-0123-EL-CSS
	)	
v.	)	
	)	
The Cleveland Electric Illuminating Company,	)	
	)	
Respondent	)	

**ANSWER OF THE CLEVELAND ELECTRIC ILLUMINATING COMPANY**

The Cleveland Electric Illuminating Company (“CEI” or the “Company”) is a public utility company, as defined by R.C. §4905.03(C) and is duly organized and existing under the laws of the State of Ohio. The Complaint of Nina R. Jones (“Complainant”) consists of a Public Utilities Commission of Ohio Formal Complaint Form containing handwritten information followed by 43 unnumbered pages of attachments (collectively the “Complaint”). CEI will attempt to specifically answer each allegation in the Complaint. To the extent that CEI does not respond to a specific allegation, CEI denies any such allegation.

Therefore, in accordance with Rule 4901-9-01(D) of the Ohio Administrative Code, Respondent CEI for its Answer to the Complaint states:

**FIRST DEFENSE**

1. In response to the sentence numbered “1” on the first page of the Complaint, to the extent that the sentence purports to allege that CEI has improperly increased Complainant’s bills and/or improperly placed disconnection notices on Complainant’s bills, CEI denies the allegations.

2. In response to the sentence numbered “2” on the first page of the Complaint, to the extent that the paragraph purports to allege that CEI has improperly changed a payment plan and/or improperly increased Complainant’s bills, CEI denies the allegations.

3. In response to the remaining allegations on the first page of the Complaint, CEI denies that it “will not be fair.” Responding further, CEI cannot decipher the remaining allegations on the first page of the Complaint and/or is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations on the first page of the Complaint, and therefore denies them.

4. In response to the attachments to the Complaint, CEI states that the attachments speak for themselves but denies any allegations purportedly contained therein.

**SECOND DEFENSE**

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

**THIRD DEFENSE**

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

**FOURTH DEFENSE**

7. The Commission may lack jurisdiction to award the relief Complainant seeks.

**FIFTH DEFENSE**

8. At all times, CEI complied with Ohio Revised Code Title 49; the applicable rules, regulations, and orders of the Public Utilities Commission of Ohio; and its Tariff, PUCO No. 13, on file with the Public Utilities Commission of Ohio. These statutes, rules, regulations, orders, and tariff provisions bar Complainant’s claims.

**SIXTH DEFENSE**

9. CEI denies all allegations of the Complaint that are not otherwise admitted herein.

**SEVENTH DEFENSE**

10. CEI reserves the right to supplement its answer with other defenses, including affirmative defenses, as discovery progresses in this matter.

WHEREFORE, CEI respectfully requests an order dismissing the Complaint and granting CEI all other necessary and proper relief.

Respectfully submitted,

*/s/Christine E. Watchorn*

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Christine E. Watchorn (0075919)

Counsel of Record

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(Willing to accept service by email)

*Attorney for Respondent*

*The Cleveland Electric Illuminating Company*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the forgoing Answer of the Cleveland Electric Illuminating Company was served upon the following by U.S. Mail on this 1<sup>st</sup> day of March 2021:

Ms. Nina R. Jones  
25021 Aurora Road #345  
Bedford Heights, Ohio 44146

*/s/Christine E. Watchorn*

\_\_\_\_\_  
Christine E. Watchorn

*Attorney for Respondent*

*The Cleveland Electric Illuminating Company*

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

**Commission of Ohio Docketing Information System on**

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**in**

**Case No(s). 21-0123-EL-CSS**

Summary: Answer electronically filed by Ms. Christine E. Watchorn on behalf of The Cleveland Electric Illuminating Company