

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Complaint of Manjula R. Shah)	
)	
)	
)	
Complainant,)	Case No. 21-125-EL-CSS
)	
v.)	
)	
Interstate Gas Supply, Inc.)	
d/b/a IGS Energy)	
6100 Emerald Parkway)	
Dublin, Ohio 43016)	
)	
)	
)	
Respondent.)	

ANSWER OF INTERSTATE GAS SUPPLY, INC.

Michael A. Nugent (0090408)
Counsel of Record
E-Mail: mnugent@igsenergy.com
Joseph Olikier (0086088)
E-Mail: joliker@igsenergy.com
Interstate Gas Supply, Inc.
IGS Energy
6100 Emerald Parkway
Dublin, Ohio 43016
(614) 659-5065

Attorneys for IGS Energy

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ANSWER OF INTERSTATE GAS SUPPLY, INC.

Pursuant to Ohio Adm. Code 4901-9-01(B) and the Public Utilities Commission of Ohio's ("PUCO") service letter dated February 10, 2021, Respondent Interstate Gas Supply, Inc. ("IGS") hereby answers the allegations in the Complaint of Manjula R. Shah ("Complainant") as follows:

1. IGS admits that it provided competitive retail electric services to the service address identified in the Complaint (i.e. 11832 Woodvale Court, Cincinnati, Ohio 45246) up until December 29, 2020, but can neither confirm nor deny that the Complainant is/was an IGS customer.
2. IGS denies the allegations set forth in the Complaint that the electric supply rates charged to that service address were inaccurate and/or violated the terms of the supply agreement between IGS and the customer of record.

3. IGS avers that it has complied with all statutory and regulatory requirements regarding retail electric supply contract administration and disclosure.
4. IGS lacks knowledge or sufficient information to admit or deny the truth of the remaining allegations in the Complaint, and, therefore, denies such allegations.

AFFIRMATIVE DEFENSES

1. The Complainant lacks standing to bring the Complaint on behalf of other unnamed Complainants.
2. The Complaint fails to state a claim against IGS upon which relief may be granted.
3. The Complaint does not assert any allegations of fact that would give rise to a cognizable claim against IGS.
4. IGS asserts as an affirmative defense that pursuant to OAC 4901-9-01(B), Complainant has failed to “set forth a statement which clearly explains the facts” since the allegations omit numerous details necessary to answer them.
5. IGS asserts as an affirmative defense that pursuant to R.C. 4905.26 and OAC 4901-9-01(C)(3), Complainant has failed to set forth reasonable grounds for the Complaint.
6. IGS asserts as an affirmative defense that at all times relevant to Complainant’s claims, the Company acted in conformance with OAC 4901:1-21 as well as all other applicable laws, rules, regulations, and orders of the PUCO.
7. IGS asserts as an affirmative defense that pursuant to OAC 4901-9-01(B), Complainant has not stated any request for relief, including relief which may be granted by this Commission.
8. IGS reserves the right to raise additional affirmative defenses or to withdraw any of the foregoing affirmative defenses as may become necessary during the investigation and discovery of this matter.

CONCLUSION

WHEREFORE, having fully answered, Interstate Gas Supply, Inc. respectfully moves this Commission to dismiss the Complaint of Manjula R. Shah with prejudice and grant IGS all other necessary and proper relief.

Respectfully submitted,

/s/ Michael A. Nugent

Michael A. Nugent (0090408)

Counsel of Record

E-Mail: mnugent@igsenergy.com

Joseph Olier (0086088)

E-Mail: joliker@igsenergy.com

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Answer has been served upon the following persons, via regular U.S. mail, postage prepaid, this 2nd day of March 2021.

/s/ Michael A. Nugent

Michael A. Nugent
Attorney for Respondent
Interstate Gas Supply, Inc.

SERVICE LIST

Manjula R. Shah
11832 Woodvale Court
Cincinnati, OH 45246

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Case No(s). 21-0125-EL-CSS

Summary: Answer of Interstate Gas Supply, Inc. electronically filed by Mr. Michael A Nugent on behalf of Interstate Gas Supply, Inc.