

**BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO**

<b>Mamoudou Diallo,</b>	)	
	)	
<b>Complainant,</b>	)	
	)	
<b>v.</b>	)	<b>Case No. 21-0258-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 Complainant Mamoudou Diallo filed in this proceeding on March 22, 2021:

**ANSWER TO ALLEGATIONS**

1. AEP Ohio admits it opened an electric service account for electric service provided at 1289 E. 25<sup>th</sup> Ave. Columbus, Ohio 43211, in Complainant’s name on June 18, 2020. AEP Ohio further admits that it properly backbilled Complainant for service provided to this address from January 3, 2020 until June 18, 2020.
2. AEP Ohio admits that it billed Complainant for service provided to 1289 E. 25<sup>th</sup> Ave. Columbus, Ohio 43211 until December 4, 2020 when AEP Ohio received a request to open a new account for electric service provided to the address from a new customer.
3. AEP Ohio admits that it transferred Complainant’s unpaid balance of approximately \$742 associated with service provided at 1289 E. 25<sup>th</sup> Ave. Columbus, Ohio 43211 to Complainant’s then-active electric service account at 1646 E. Weber St, Apt. C, Columbus, Ohio 43211 on December 9, 2020.

4. AEP Ohio admits that, when Complainant terminated his electric service account at 1646 E. Weber St, Apt. C, Columbus, Ohio 43211 on December 26, 2020, AEP Ohio transferred the total unpaid balance of approximately \$758, which included unpaid balances from 1289 E. 25<sup>th</sup> Ave. Columbus, Ohio 43211 and 1646 E. Weber St, Apt. C, Columbus, Ohio 43211, to Complainant's then-active electric service account at 5581 Whimpstone Ct., Columbus, Ohio 43225.

5. AEP Ohio denies that it required a deposit to open the electric service account in Complainant's name at 1646 E. Weber St, Apt. C, Columbus, Ohio 43211.

6. AEP Ohio denies that it billed Complainant for service that he never used.

7. AEP Ohio denies that the Company bullied Complainant in any manner.

8. AEP Ohio denies that it wrongfully disconnected electric service to 1289 E. 25<sup>th</sup> Ave. Columbus, Ohio 43211.

9. AEP Ohio denies all Complainant's assertions related to the alleged fire at 1289 E. 25<sup>th</sup> Ave. Columbus, Ohio 43211 for lack of information or knowledge sufficient to form a belief thereon.

10. AEP Ohio admits that Complainant has attached multiple exhibits that purport to be copies of electric service bills from AEP Ohio, disconnect notices from AEP Ohio, and a collection notice from LJ Ross Associates, Inc. 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.

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

#### **AFFIRMATIVE DEFENSES**

1. AEP Ohio avers that Complainant has 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 grant the requested relief.
4. AEP Ohio provided reasonable and adequate service to Complainant 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

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(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 Complainant at the address listed below by regular U.S. mail, postage prepaid, on this 9th day of April, 2021.

Mamoudou Diallo  
5581 Whimpstone Ct.  
Columbus, Ohio 43235

**Complainant**

/s/ Tanner S. Wolffram  
Tanner S. Wolffram

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

**Commission of Ohio Docketing Information System on**

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**Case No(s). 21-0258-EL-CSS**

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