

<b>George A. Dreiling</b>	)	
257 W. Co. Rd. 925 North	)	
Batesville, Indiana 47006	)	
	)	
AND	)	Case No. 21-0483-EL-CSS
	)	
730 Derby Ave.	)	
Cincinnati, Ohio 45232	)	
Complainant,	)	
	)	
v.	)	
	)	
<b>Duke Energy Ohio, Inc.</b>	)	
	)	
Respondent.	)	

For its Answer to the Complaint of George A. Dreiling (Complainant), Duke Energy Ohio, Inc., (Duke Energy Ohio or Respondent or the Company) states as follows:

1. The Complaint is not in a form allowing for specific admission or denial as to individual allegations. Accordingly, Duke Energy Ohio generally denies the allegations set out in the Complaint.

2. Statements regarding general procedures for the Public Utilities Commission of Ohio (Commission) are not allegations to which a response is required.

3. Statements regarding requested relief are not allegations to which a response is required.

4. Duke Energy Ohio denies the allegations contained in each of the paragraphs of the Complaint. Answering further, Duke Energy Ohio states that Complainant received a

disconnect notice requiring payment of \$183.75 by April 23, 2021, to avoid disconnect. Answering further, Duke Energy Ohio states that no disconnect of Complainant's service occurred, as Complainant filed his Complaint on April 21, 2021. All remaining allegations are denied.

5. Duke Energy Ohio denies each and every allegation of fact and conclusion of law not expressly admitted herein.

### **AFFIRMATIVE DEFENSES**

1. The Complainant does not assert any allegations of fact that would give rise to a cognizable claim against Duke Energy Ohio.

2. Duke Energy Ohio asserts as an affirmative defense that pursuant to R.C. 4905.26 and O.A.C. 4901-9-01-(C)(3), Complainant has failed to set forth reasonable grounds for complaint.

3. Duke Energy Ohio asserts as an affirmative defense that Complainant has not stated any request for relief that can be granted by this Commission.

4. Duke Energy Ohio asserts that to the extent Complainant is seeking monetary damages, such relief is beyond the scope of the Commission's jurisdiction.

5. Duke Energy Ohio asserts that to the extent the Complainant is seeking equitable relief, such relief is beyond the scope of the Commission's jurisdiction.

6. Duke Energy Ohio 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, Duke Energy Ohio respectfully requests that the Commission dismiss the Complaint of George A. Dreiling, for failure to set forth reasonable grounds for the Complaint and to deny Complainant's requests for relief.

Respectfully submitted,

DUKE ENERGY OHIO, INC.

/s/ Larisa M. Vaysman

Rocco O. D'Ascenzo (0077651)

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Willing to accept service via email

**Attorneys for Respondent Duke Energy Ohio,  
Inc.**

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Answer of Duke Energy Ohio, Inc., was served via UPS delivery, this 11<sup>th</sup> day of May 2021, upon the following:

George A. Dreiling  
257 W. Co. Rd. 925 North  
Batesville, Indiana 47006

George A. Dreiling  
730 Derby Ave.  
Cincinnati, Ohio 45232

/s/ Larisa M. Vaysman  
Larisa M. Vaysman

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**Case No(s). 21-0483-EL-CSS**

Summary: Answer of Duke Energy Ohio, Inc. electronically filed by Carys Cochern on behalf of Duke Energy Ohio, Inc.