

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

Patricia A. Raymond,)	
)	
Complainant,)	
)	Case No. 21-0787-EL-CSS
v.)	
)	
Ohio Edison Company,)	
)	
Respondent.)	

ANSWER OF OHIO EDISON COMPANY

Ohio Edison Company (“OE”) is a public utility company as defined by §4905.03(C) of the Ohio Revised Code and is duly organized and existing under the laws of the State of Ohio. In accordance with Rule 4901-9-01(D) of the Ohio Administrative Code, OE for its Answer to the Complaint of Patricia Raymond (the “Complainant”) states:

In substance, Complainant’s Complaint consists of a letter spanning two pages. To the extent OE does not respond to a specific allegation, OE denies every such allegation. OE reserves the right to supplement or amend this Answer.

1. OE admits that Complainant’s name and service address are consistent with OE’s records.
2. OE admits that a smart meter was installed at 3790 Woodbury Oval, Stow, Ohio 44224 (the “Premises”) by Wellington Energy Inc. (“WEI”) on behalf of OE on February 23, 2021.
3. OE admits that WEI performed a field visit to the Premises on February 23, 2021, in response to a complaint from Complainant regarding her appliances. OE admits that as part of this field visit, the WEI foreman performed an investigation of the meter socket and meter but did not find any signs of overheating or arc damage in the meter

that would indicate whether a surge had occurred during or prior to the meter exchange.

4. OE admits that that Complainant filed and OE denied a claim for damage to Complainant's appliances.
5. OE lacks knowledge or information sufficient to respond to the remaining allegations of the Complaint, and therefore denies the same.

AFFIRMATIVE DEFENSES

1. The Complaint fails to set forth reasonable grounds for Complaint, as required by Section 4905.26, Revised Code.
2. The Complaint fails to name a necessary party as a defendant.
3. The Complaint fails to state a claim upon which relief can be granted.
4. The Commission lacks subject matter jurisdiction over some or all of Complainant's claims.
5. OE reserves the right to raise other defenses as warranted by discovery in this matter.

WHEREFORE, OE respectfully requests an Order dismissing the Complaint with prejudice and granting OE all other necessary and proper relief.

Respectfully submitted

/s/ Mark K Norris

Mark K. Norris (0092222)

Counsel of Record

BENESCH, FRIEDLANDER, COPLAN &

ARONOFF LLP

200 Public Sq., Ste. 2300

Cleveland, Ohio 44114

(216) 363-4500

mnorris@beneschlaw.com

Emily V. Danford (0090747)
OHIO EDISON COMPANY
76 South Main Street
Akron, OH 44308
(330) 384-5849
edanford@firstenergycorp.com

Attorneys for Ohio Edison Company

CERTIFICATE OF SERVICE

On July 28, 2021, the foregoing Answer of Ohio Edison Company was filed on the Public Utilities Commission of Ohio's Docketing Information System. The PUCO's e-filing system will electronically serve notice of the filing of this document on all parties of record in this proceeding.

A copy has also been sent by U.S. Mail to the following:

Patricia A. Raymond
3790 Woodbury Oval
Stow, Ohio 44224

A copy has also been sent by email to the following:

jetack@aol.com

/s/ Mark K. Norris
Attorney for Ohio Edison Company

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

7/28/2021 2:54:57 PM

in

Case No(s). 21-0787-EL-CSS

Summary: Answer Answer and Affirmative Defenses of Ohio Edison Company electronically filed by Mr. Mark K Norris on behalf of Ohio Edison Company