

21-0760-GA-CSS

07/23/2021

Paul E. Fish
429 Independence St.
Fairport Harbor, Ohio
44077

FILE

Greetings, it was not made clear to me as to where and how I should file my response to the answer by Dominion in Case No. 21-0760-GA-CSS, so I sent it to this office where my original complaint was filed, with one original, and two copies as per my original complaint. I do hope that this is adequate for you. The only other option would be for me to send this to the attorneys for Dominion, which seems somewhat nonsensical to me.

Thank you.

Paul E. Fish

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**BEFORE THE PUBLIC
UTILITIES COMMISSION OF OHIO**

PAUL E. FISH,

Complainant,

vs.

**THE EAST OHIO GAS COMPANY
D/B/A DOMINION ENERGY OHIO,**

respondent

) Case No. 21-0760-GA-CSS

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) **RESPONSE TO ANSWER**

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Here comes PAUL E. FISH (Mr. Fish) with a response to the answer to the complaint filed against **THE EAST OHIO GAS COMPANY D/B/A DOMINION ENERGY OHIO (Dominion)**.

In Dominion's answer, Dominion cited **Adm. Code 4901-9-01 (D) and (F)**. In **Adm. Code 4901-9-01 (D)**, it says:

“(D) The public utility shall state in its answer, in short and plain terms, its defenses to each claim asserted, and shall admit or deny the allegations upon which the complainant relies. If the public utility is without sufficient knowledge or information to form a belief as to the truth of an allegation, it shall so state and this has the effect of a denial. If the public utility intends in good faith to deny all of the allegations in the complaint, it may do so by general denial. If it does not intend to deny all of the allegations in the complaint, it shall either make specific denials of designated allegations or paragraphs, or generally deny all allegations except those allegations or paragraphs that it expressly admits. Unless otherwise ordered by the commission, the legal director, the deputy legal director, or an

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attorney examiner, all material allegations in the complaint which are not denied in the answer shall be deemed admitted for purposes of the proceeding."

In the answer by Dominion, they have failed to address their alleged actions that prompted this complaint, as required in (D), so to dismiss this complaint without all evidence being heard and all pleas being made would be premature to say the least. Furthermore, without (D) being satisfied, (F) cannot be legitimately addressed or even considered.

This brings us to the next point. Mr. Fish alleges that Dominion attempted to usurp the rights of Mr. Fish by holding their company policies above established law by trying to force Mr. Fish and his family to surrender their property rights and their rights to make lawful rules for their property, and, in addition, attempted to ignore the religious rights and the sanctuary status of their home, by attempting to intimidate and to threaten Mr. Fish with utility shutoff if Mr. Fish would not put Dominion's company policy above his, and his family's God-given rights.

It is not a surprise to Mr. Fish that Dominion would ignore the requirements of **4901-9-01 (D)**, because, in doing so, and asking for a dismissal **WITH PREJUDICE**, would, if granted, give Dominion Carte Blanche over Mr. Fish's rights and home in the future, giving Mr. Fish absolutely no defense against such heinous overreach and abuse of power by Dominion as was allegedly, previously attempted. This would open the door for Dominion to perform any acts of malice and revenge that they see fit without even as much as a word to restrain their actions.

HOWEVER, it is also not within the scope of authority for the PUCO, or any other authoritative body in the United States of America, to grant the usurpation of any of the US citizens' rights, without due process. With this said, any dismissal **WITH PREJUDICE** would, in fact, would deny Mr. Fish of due process, and would in fact, be usurpation of Mr. Fish's rights and of the rights of his family, because it would provide no recourse for Mr. Fish if Dominion were to attempt this same action in the future, and would provide Dominion with established case reference in order to empower the illegal usurpation of Mr. Fish's rights in all future interactions.

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Mr. Fish is not currently seeking any monetary relief, nor is he currently seeking any form of punishment for any Dominion employees because of their alleged illegal actions, nor is he currently seeking any discount of any kind on his service, or any fines to be levied. Mr. Fish only asks that not only he, but all Dominion customers' rights are not only recognized, but are held in higher regard than the company policies of Dominion. It is a humble request of Mr. Fish that Dominion is ordered to send letters to all of their customers in all of its 16 states, stating that they promise to keep the rights of their customers above their company policies, and that they will accommodate any and all American citizen's rights, no matter what their company policies might dictate. The letter should also provide a list of the rights that could be violated and the laws that protect those rights, so that everybody is informed.

For Dominion to consider this case "satisfied" only addresses their immediate needs, not the larger picture that they have conveniently avoided where their alleged attempted violation of the rights of Mr. Fish and his family are concerned. It was the actions of Dominion that led to this complaint, and simply inspecting a meter does not "satisfy" this case in the least. One might ask, "If Dominion allegedly did this to Mr. Fish, how many thousands of other citizens' rights were allegedly also violated by Dominion?" If that question is asked on a broad and wide-ranging scale, it could potentially bring tens of thousands of people forward.

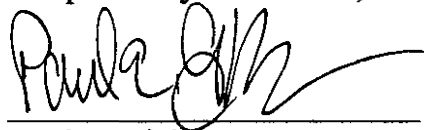
WHEREFORE, It is the humble request of Paul E. Fish that Dominion is ordered to send letters to all of their customers in all of its 16 states, stating that they promise to keep the rights of their customers above their company policies, and that they will accommodate any and all American citizen's rights, no matter what their company policies might dictate. The letter should also provide a list of the rights that could be violated and the laws that protect those rights, so that everybody is informed. (This is a more than reasonable resolution to this case, and causes absolutely no harm or hardship to any parties involved, and is the most equitable solution for all parties involved.)

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FURTHERMORE, If the PUCO were to find it necessary to dismiss this case, which would, in the opinion of Mr. Fish and company would be premature, we ask that the PUCO do so **WITHOUT PREJUDICE**, in order not to overstep the authority of their position by improperly granting a company, wholesale authority over the legal rights of United States Citizens, and to possibly bring themselves into violation of Federal and State constitutional laws, themselves.

IN CLOSING, Mr. Fish and company are reasonably confident that the PUCO will do that which is legally proper, constitutionally adequate, and which is satisfactory for all parties involved, and allow this case to be resolved properly and thoughtfully.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Paul E. Fish", written over a horizontal line.

Paul E. Fish

429 Independence St
Fairport Harbor, Ohio
44077

Friday, July 23, 2021