

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of Great Investment Properties, LLC,)	
)	
)	
Complainant,)	
)	CASE NO. 21-1142-EL-CSS
vs.)	
)	
Ohio Edison Company,)	
)	
Respondent.)	

ANSWER OF RESPONDENT OHIO EDISON COMPANY

Ohio Edison Company (“Ohio Edison”) 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), Ohio Administrative Code, the Respondent, Ohio Edison for its answer to the Complaint of Great Investment Properties, LLC (the “Complainant”) states:

Complainant’s Complaint consist of a Formal Complaint Form cover page and two typed pages containing unnumbered paragraphs and a numbered list of alleged reasons why Complainant believes it should not have to pay the balance due on their utility bill. To the extent Ohio Edison does not respond to a specific allegation, Ohio Edison denies any such allegation. Ohio Edison reserves the right to supplement or amend this Answer.

1. In response to the cover page of the Complaint, Ohio Edison admits that Great Investment Properties, LLC is the customer of record for the Ohio Edison account associated with service address 248 North State Street, 1st Floor, Marion, Ohio 43302. Responding further, Ohio Edison states Great Investment Properties was the customer of record for the Ohio Edison account associated with service address 891 1/2 East Church Street, Marion, Ohio 43302. Specifically,

Great Investment Properties obtained service at the East Church Street address on February 10, 2021. This account was set up on electronic billing at the request of the customer and Ohio Edison was provided with an email of freymk@aol.com.

2. In response to the first two unnumbered paragraphs on the first page of Complainant's Complaint, Ohio Edison lacks knowledge or information regarding the operations of Complainant's business and therefore denies any allegations regarding the same.

3. In response to the third unnumbered paragraph on the first page of Complainant's Complaint, Ohio Edison lacks knowledge or information regarding any communication between other individuals and Complainant and therefore denies any allegations regarding the same. Responding further, Ohio Edison states that although a request for move in service was requested by Karen Schirtzinger on February 25, 2021, the request was denied twice due to identification issues and therefore the service remained in Great Investment Properties name and was electronically billed as requested by Great Investment Properties when it set up service to begin at the Church Street address on February 10, 2021. Ohio Edison denies providing Dan and/or Karen Schirtzinger a confirmation number to begin electric service in their name at the Church Street address.

4. In response to the remaining unnumbered paragraphs in Complainant's Complaint and the numbered reasons provided in the Complaint, Ohio Edison states that the Church Street account remained on electronic billing to Great Investment Properties at freymk@aol.com and at no time did Great Investment Properties contact Ohio Edison to end service at the Church Street address. Responding further, Ohio Edison states that service was disconnected at the Church Street address in July 2021 due to non-payment. Further responding, Ohio Edison states that payment was not made to restore service at the address and the account was final billed in the amount of

\$747.17. This final bill was sent by email per the customer's request for electronic billing and the amount went unpaid. As a result, the account was closed, and the final bill transferred to the Great Investment Properties active account at the North State Street address.

AFFIRMATIVE DEFENSES

1. The Complainant fails to set forth reasonable grounds for Complaint, as required by Section 4905.23, Revised Code.

2. The Complaint fails to state a claim upon which relief can be granted.

3. The Commission lacks subject matter jurisdiction over some or all of Complainant's claims.

4. At all times, Ohio Edison complied with the Ohio Revised Code Title 49; the applicable rules, regulations, and orders of the Public Utilities Commission of Ohio; and its Tariff, PUCO No. 11, on file with the Public Utilities Commission of Ohio. These statutes, rules, regulations, orders and tariff provisions bar Complainant's claims.

5. Ohio Edison reserves the right to raise other defenses as warranted by discovery in this matter.

WHEREFORE, Ohio Edison Company respectfully requests an Order dismissing the Complaint and granting Ohio Edison Company all other necessary and proper relief.

Respectfully submitted,

/s/ John W. Breig, Jr.

John W. Breig, Jr. (0096767)

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Counsel for Ohio Edison Company

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the forgoing Answer was filed electronically through the Docketing Information System of the Public Utilities Commission of Ohio on this 22nd day of November 2021. A copy of the foregoing Answer was served by regular U.S. mail to the following person on this 22nd day of November 2021:

Great Investment Properties, LLC
Attn: Mark Freyhof
4826 Larue Prospect Road, S.
Prospect, Ohio 43342

/s/ John W. Breig, Jr.
John W. Breig, Jr. (0096767)
One of the Attorneys for Ohio Edison Company

**This foregoing document was electronically filed with the Public Utilities
Commission of Ohio Docketing Information System on**

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in

Case No(s). 21-1142-EL-CSS

Summary: Answer Answer of Respondent Ohio Edison Company electronically
filed by Mr. John W. Breig on behalf of Ohio Edison Company