

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

Rich Throckmorton,)	
)	Case No. 22-0015-EL-CSS
Complainant,)	
)	
v.)	
)	
Ohio Power Company,)	
)	
Respondent.)	

ANSWER OF RESPONDENT OHIO POWER COMPANY

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, Rich Throckmorton, filed in this proceeding on January 5, 2022:

ANSWER TO ALLEGATIONS

1. AEP Ohio admits that Complainant is a customer of AEP Ohio.
2. AEP Ohio admits that Complainant has filed four damages claims with AEP Ohio since 2012, all of which were denied.
3. 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. The Complainant fails to state a claim upon which relief can be granted.
3. AEP Ohio, at all times, complied with all applicable Ohio statutes; the Commission’s rules, regulations, and orders; and AEP Ohio’s tariffs.
4. The Complainant’s claims are time-barred.

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/ Michael J. Schuler

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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 25th day of January, 2022.

Rich Throckmorton
316 Duncan Rd.
Lucasville, Ohio 45648

/s/ Michael J. Schuler
Michael J. Schuler (0082390)

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in

Case No(s). 22-0015-EL-CSS

Summary: Answer Answer of Respondent Ohio Power Company electronically filed
by Michael J. Schuler on behalf of Ohio Power Company