

	BEFORE THE	
	PUBLIC UTILITIES COMMISSION OF OHIO	
LLOYD JACKSON,)	
)	
Complainant,)	
)	
vs.)	CASE NO. 22-0193-EL-CSS
)	
THE CLEVELAND ELECTRIC)	
ILLUMINATING COMPANY,)	
)	
Respondent.)	

ANSWER OF THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

The Cleveland Electric Illuminating Company (“CEI”) 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, CEI for its answer to the Complaint of Lloyd Jackson (the “Complainant”) states:

Complainant’s Complaint consists of one page with one unnumbered paragraph. To the extent CEI does not respond to a specific allegation, CEI denies any such allegation. CEI reserves the right to supplement or amend this Answer.

1. In response to the Complaint, CEI admits that Lloyd Jackson is the customer of record for the CEI account associated with service address 24455 Lake Shore Blvd., Apt 1815, Euclid, Ohio 44123.

2. In response to the sole unnumbered paragraph in the Complaint, CEI admits that pursuant to COVID procedures, estimated meter readings occurred until an actual meter read took place on August 27, 2021, at which time the Complainant’s previous estimated readings were reconciled with the actual usage recorded on this date and the Complainant was billed for the

reconciled amount. Responding further, CEI denies both that Complainant was overbilled, and that Complainant overpaid for his electrical services.

3. Responding further, CEI states that at the request of Complainant, on or about September 20, 2021, Meter No. S313390372 was removed from the premises for testing and was replaced with Meter No. S335894356. Meter No. S313390372 was tested with results of 99.99% accuracy, which is within Commission-approved tolerances.

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 state a claim upon which relief can be granted.

3. CEI at all times complied with the Ohio Revised Code Title 49; the applicable rules, regulations, and orders of the Public Utilities Commission of Ohio; and Tariff, PUCO No. 13, on file with the Public Utilities Commission of Ohio. These statutes, rules, regulations, orders, and tariff provisions bar Complainant's claims.

4. CEI reserves the right to raise other defenses as warranted by discovery in this matter.

WHEREFORE, The Cleveland Electric Illuminating Company respectfully requests an Order dismissing the Complaint and granting The Cleveland Electric Illuminating 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 The Cleveland Electric Illuminating
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 1st day of April 2022. A service copy has been mailed by Regular U.S. Mail this same date to:

Lloyd Jackson
24455 Lake Shore Blvd., Apt 1815
Euclid, Ohio 44123
Complainant

/s/ John W. Breig, Jr.
John W. Breig, Jr. (0096767)
*One of the Attorneys for The Cleveland Electric
Illuminating Company*

**This foregoing document was electronically filed with the Public Utilities
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in

Case No(s). 22-0193-EL-CSS

Summary: Answer Answer of Respondent The Cleveland Electric Illuminating
Company electronically filed by Mr. John W. Breig on behalf of The Cleveland
Electric Illuminating Company