

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

DAVID SCHIFER,)	
)	
Complainant,)	
)	
vs.)	CASE NO. 22-0435-EL-CSS
)	
OHIO EDISON COMPANY,)	
)	
Respondent.)	

ANSWER OF OHIO EDISON COMPANY

Ohio Edison Company (“Ohio Edison” or the “Company”) 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, Ohio Edison for its answer to the Complaint of David Schifer (the “Complainant”) states:

Complainant’s Complaint consists of various assertions in five pages and multiple unnumbered paragraphs. 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. As to the first unnumbered page of the Complaint, Ohio Edison admits that Complainant is an Ohio Edison customer with account number 110 153 754 939 and service address 1019 State Route 294, Bucyrus, Ohio 44820.

2. In response to the second unnumbered page of the Complaint, Ohio Edison states Complainant contacted Ohio Edison in October 2021 about starting service to his property. On October 22, 2021, an Ohio Edison line planner/designer spoke with Complainant about his request and advised Complainant that he could not install the customer’s meter base on the Ohio Edison pole located on the property, however, Ohio Edison states that the Complainant was advised that

he could run an underground riser on the Ohio Edison pole to his equipment. Ohio Edison lacks knowledge or information sufficient to respond to the remaining allegations on the second unnumbered page of the Complaint, and therefore denies the same.

3. In response to the third page of the Complaint (incorrectly numbered page 2), Ohio Edison states that on October 22, 2021, Complainant was provided a copy of the Customer Guide for Electric Service, which included the specifications necessary for a customer riser, underground meter base, and meter pedestal. Responding further, Ohio Edison states that an Ohio Edison line planner/designer spoke with an electrician working on Complainant's behalf about the necessary specifications and materials to build the meter pedestal. Ohio Edison lacks knowledge or information sufficient to respond to the remaining allegations on the third page of the Complaint, and therefore denies the same.

4. In response to the fourth page of the Complaint (incorrectly numbered page 3), Ohio Edison states that on November 19, 2021, Complainant submitted his new service order. Responding further, Ohio Edison states that the permit for the electrical service inspection was received on December 7, 2021, and construction and meter set was completed on the property on December 9, 2021. Ohio Edison lacks knowledge or information sufficient to respond to the remaining allegations on the fourth page of the Complaint, and therefore denies the same.

5. In response to the allegations contained on the fifth unnumbered page of the Complaint, Ohio Edison denies the allegations set forth and denies that Complainant is entitled to the requested relief sought.

6. In response to the allegations contained on the sixth page of the Complaint (incorrectly numbered page 4), Ohio Edison denies the allegations set forth and denies that Complainant is entitled to the requested relief sought.

AFFIRMATIVE DEFENSES

1. The Complaint fails to set forth reasonable grounds for a Complaint, as required by Section 4905.26, Revised Code.

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

3. Ohio Edison 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. 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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Attorneys 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 5th day of May 2022. A service copy has been mailed by Regular U.S. Mail this same date to:

David Schifer
1065 State Route 294
Bucyrus, Ohio 44820
Complainant

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

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