

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

Fred L. Harris)	
)	Case No. 22-552-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, Fred L. Harris, filed in this proceeding on May 25, 2022:

ANSWER TO ALLEGATIONS

1. AEP Ohio admits that Complainant is a customer of AEP Ohio.
2. AEP Ohio admits that Complainant filed an informal case with the Public Utilities Commission of Ohio (“PUCO”) under case ID 00752850.
3. AEP Ohio admits that on April 8, 2022, the Company provided Complainant with a detailed spreadsheet explanation of the charges.
4. AEP Ohio denies or is without sufficient knowledge to ascertain the veracity of the remaining allegations as described in the Complaint and therefore denies the same.

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 PUCO lacks jurisdiction over this claim.
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 PUCO dismiss the Complaint with prejudice and grant the Company all other necessary and proper relief.

Respectfully submitted,

/s/ Michael J. Schuler
Michael J. Schuler (0082390)
American Electric Power Service
Corporation
1 Riverside Plaza, 29th Floor
Columbus, Ohio 43215
Telephone: (614)296-0531
E-mail: mjschuler@aep.com

(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 14th day of June 2022.

Fred L. Harris
6074 McNaughten Grove Lane
Columbus, Ohio 43213

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

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in

Case No(s). 22-0552-EL-CSS

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