

BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Complaint of Bran Eubanks.	)	
	)	
	)	
	)	
Complainant,	)	
	)	
v.	)	Case No. 22-0889-EL-CSS
	)	
Interstate Gas Supply, Inc.	)	
d/b/a IGS Energy	)	
6100 Emerald Parkway	)	
Dublin, Ohio 43016	)	
	)	
	)	
Respondent.	)	

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**ANSWER OF INTERSTATE GAS SUPPLY, INC.**

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(614) 659-5065

Attorneys for IGS Energy

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Pursuant to Ohio Adm. Code 4901-9-01(B) and the Public Utilities Commission of Ohio’s (“PUCO”) service letter dated September 20, 2022, Respondent Interstate Gas Supply, Inc. (“IGS”) hereby answers the allegations in the Complaint of Brad Eubanks on behalf of Plastic Compounders Inc. (“Complainant”) as follows:

1. IGS admits that it provided competitive retail electric services to the business at the service address identified in the Complaint (i.e., Plastic Compounders, Inc. at 1125 Utica Way, Cambridge, Ohio 43725) up until June 9, 2022.
2. IGS denies any allegations set forth in the Complaint that the electric supply rates charged to that service address were inaccurate and/or violated the terms of the supply agreement between IGS and the customer of record.

3. IGS avers that it has complied with all statutory and regulatory requirements regarding retail electric supply contract administration and disclosure.
4. IGS lacks knowledge or standing to admit or deny the truth of any and all allegations made against Aspen Energy Corporation (broker)/Dynergy in the Complaint.
5. IGS lacks knowledge or sufficient information to admit or deny the truth of the remaining allegations in the Complaint, and, therefore, denies such allegations.

### **AFFIRMATIVE DEFENSES**

1. The Complaint fails to state a claim against IGS upon which relief may be granted.
2. The Complaint does not assert any allegations of fact that would give rise to a cognizable claim against IGS.
3. IGS asserts as an affirmative defense that pursuant to OAC 4901-9-01(B), Complainant has failed to “set forth a statement which clearly explains the facts” since the allegations omit numerous details necessary to answer them.
4. IGS asserts as an affirmative defense that pursuant to R.C. 4905.26 and OAC 4901-9-01(C)(3), Complainant has failed to set forth reasonable grounds for the Complaint.
5. IGS asserts as an affirmative defense that at all times relevant to Complainant’s claims, the Company acted in conformance with OAC 4901:1-21 as well as all other applicable laws, rules, regulations, and orders of the PUCO.
6. IGS asserts as an affirmative defense that pursuant to OAC 4901-9-01(B), Complainant has not stated any request for relief, including relief which may be granted by this Commission.
7. IGS reserves the right to raise additional affirmative defenses or to withdraw any of the foregoing affirmative defenses as may become necessary during the investigation and discovery of this matter.

## **CONCLUSION**

**WHEREFORE**, having fully answered, Interstate Gas Supply, Inc. respectfully moves this Commission to dismiss the portion of the Complaint filed against it by Brad Eubanks with prejudice and grant IGS all other necessary and proper relief.

Respectfully submitted,

**/s/ Evan Betterton**

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Interstate Gas Supply, Inc.

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing Answer has been served upon the following persons, via regular U.S. mail, postage prepaid, this 7<sup>th</sup> day of October 2022.

/s/ *Evan Betterton*  
Evan Betterton  
Attorney for Respondent  
Interstate Gas Supply, Inc.

**SERVICE LIST**

Brad Eubanks  
1125 Utica Way  
Cambridge, Ohio 43725

Aspen Energy Corporation  
Sandra Jackson  
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Dublin, Ohio 43016

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

**10/11/2022 1:37:46 PM**

**in**

**Case No(s). 22-0889-EL-CSS**

Summary: Answer electronically filed by Mr. Evan F. Betterton on behalf of  
Interstate Gas Supply, Inc.