

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

ANNATIONETTE CAMPBELL,)	
)	
Complainant,)	
)	
vs.)	CASE NO. 22-0904-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 Anntionette Campbell (the “Complainant”) states:

Complainant’s Complaint consists of one page with an unspecified allegation concerning allegedly inaccurate bills. 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 Anntionette Campbell is the customer of record for the CEI account associated with service address 9820 South Blvd., Cleveland, Ohio, 44108.

2. In response to the sole sentence in the Complaint, CEI denies that Complainant’s electric utility bills were inaccurate. Responding further, CEI denies both that Complainant was overbilled, and that Complainant overpaid for her electrical services.

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 17th day of October 2022. A service copy has been mailed by Regular U.S. Mail this same date to:

Anntionette Campbell
9820 South Blvd.
Cleveland, Ohio, 44108
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). 22-0904-EL-CSS

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