

THE PUBLIC UTILITIES COMMISSION OF OHIO

IN THE MATTER OF THE COMPLAINTS OF

**JOSHUA LEESER,
KARL CROSKEY,
PATTI HOEGLER,
JENNIFER FOUTS,
MELBA GASQUE & MONICA TATSUMI,
MELBA GASQUE,
LESLIE BAKER,
FRED MCKINNEY,
RONALD E. WRIGHT,
THERESA CHRISMAN,
GREGORY HOEGLER,
VIKTORIA & MATTHEW LEE,
JEFF BRYAN,
ROBERT & DATLENE KAIL,
SHERRIE & RAY JANZ,
JAMES CLIMES,
MICHELLE NEITZEL,
MARY KRISOPP,
ROCKY POINT LICENSEES ASSOCIATION,**

Case Nos.

**22-836-WS-CSS
22-837-WS-CSS
22-838-WS-CSS
22-839-WS-CSS
22-840-WS-CSS
22-841-WS-CSS
22-842-WS-CSS
22-843-WS-CSS
22-844-WS-CSS
22-845-WS-CSS
22-846-WS-CSS
22-847-WS-CSS
22-848-WS-CSS
22-849-WS-CSS
22-850-WS-CSS
22-851-WS-CSS
22-852-WS-CSS
22-853-WS-CSS
22-1183-WS-CSS**

COMPLAINANTS,

vs.

SALT FORK UTILITY COMPANY,

RESPONDENT.

NOW COMES Defendant Salt Fork Utility Company who hereby respectfully submits its answer to Plaintiffs' Complaints. As numerous complaints have been filed by numerous plaintiffs but all known complaints make the same allegations and claims, defendant hereby answers all plaintiffs' complaints in this Answer. Defendant reserves the right to supplement, modify, revise, or provide additional answers in the future if needed.

ANSWER

1. Defendant admits the water has been shut off but denies all other allegations contained in paragraph one for lack of information or knowledge sufficient to form a belief.
2. Defendant admits the water has been shut off but denies all other allegations contained in paragraph 2 for lack of knowledge or information sufficient to form a belief.
3. Defendant denies all other allegations and claims contained in plaintiffs' complaints which defendant has not expressly admitted to herein.

AFFIRMATIVE DEFENSES

1. In Plaintiffs' complaints, the individuals listed as Plaintiffs are not direct customers of Salt Fork Utility and do not have a service agreement with Defendant. As such, they lack standing to pursue these claims.
2. Defendant states it was necessary to shut off the water to avoid significant damage to the property and/or to prevent the potential of physical harm to individuals on the property.
3. Defendant was obligated to shut off services to prevent the loss of utility, to provide for the integrity of the utility and future services, and to prevent damage to the campground and facility.

WHEREFORE, Defendant Salt Fork Utility Company, having fully answered Plaintiffs' Complaints, requests that the matter be dismissed with prejudice, at Plaintiffs' cost, and Defendant further requests to be awarded a reimbursement of all attorney's fees, expenses, and costs incurred in responding to and defending against this claim. Defendant also respectfully requests to be provided any and all further and other relief to which they are or may be entitled and of which is deemed fair and equitable.

Respectfully submitted,

/s/ Braden A. Blumenstiel

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that true copy of the foregoing has been served upon counsel below by electronic mail and US mail, on Tuesday, August 15, 2023:

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CSS, 22-0844-WS-CSS, 22-0845-WS-CSS, 22-0846-WS-CSS, 22-0848-WS-CSS,
22-0849-WS-CSS, 22-0850-WS-CSS, 22-0851-WS-CSS, 22-0852-WS-CSS, 22-
0853-WS-CSS, 22-1183-WS-CSS**

**Summary: Answer electronically filed by Mr. Braden Blumenstiel on behalf of Salt
Fork Utility Company.**