BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of The East Ohio Gas Company d/b/a Dominion East Ohio for Authority to Increase Rates for its Gas Distribution Service.

In the Matter of the Application of The East Ohio Gas Company d/b/a Dominion East Ohio for Approval of an Alternative Rate Plan for its Gas Distribution Service

In the Matter of the Application of The East Ohio Gas Company d/b/a Dominion East Ohio for Approval to Change Accounting Methods

In the Matter of the Application of The East Ohio Gas Company d/b/a Dominion East Ohio for Approval of Tariffs to Recover Certain Costs Associated with a Pipeline Infrastructure Replacement Program Through an Automatic Adjustment Clause, And for Certain Accounting Treatment

Case No. 07-829-GA-AIR

Case No. 07-830-GA-ALT

Case No. 07-831-GA-AAM

Case No. 08-169-GA-UNC

MEMORANDUM CONTRA MOTION TO DISMISS DOMINION EAST OHIO'S PIPELINE INFRASTRUCTURE APPLICATION BY THE OFFICE OF THE OHIO CONSUMERS' COUNSEL

AND

REPLY TO MEMORANDA CONTRA DOMINION EAST OHIO'S MOTION TO CONSOLIDATE BY THE OFFICE OF THE OHIO CONSUMERS' COUNSEL AND OHIO PARTNERS FOR AFFORDABLE ENERGY

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The East Ohio Gas Company d/b/a Dominion East Ohio ("DEO" or "Company"), pursuant to Rules 4901-1-12 and 4901-1-14, Ohio Administrative Code, files its Memorandum Contra the Motion to Dismiss Dominion East Ohio's Pipeline Infrastructure Application by the

Office of the Ohio Consumers' Counsel and its Reply to the Memoranda Contra Dominion East Ohio's Motion to Consolidate by the Office of the Ohio Consumers' Counsel and Ohio Partners for Affordable Energy. For the reasons that follow, the Commission should deny OCC's Motion to Dismiss and grant DEO's Motion to Consolidate.

I. INTRODUCTION

OCC's Motion to Dismiss DEO's Pipeline Infrastructure Application should be denied. The application was filed under the statute that most clearly authorized it, R.C. 4929.11.

OCC's argument that DEO does not satisfy R.C. 4929.11 because its application fails an extrastatutory test of OCC's own creation is wrong. Simply put, there is no such "test." Even if OCC's suggested requirements for an application under R.C. 4929.11 were correct, the application at issue satisfies those criteria.

OCC and OPAE both suggest that this case should have been filed as an application for an increase in rates. But rates will *not* increase upon approval of DEO's application. A rate case is not required to approve a statutorily authorized automatic adjustment mechanism. *River Gas Co. v. Pub. Util. Comm.* (1982), 69 Ohio St.2d 509, 513.

The movants' argument that the application is an alternative rate plan erroneously relies on reading R.C. 4929.01(A) as authorizing automatic adjustment mechanisms and requiring that applications therefore should be part of an alternative rate plan. This argument fails because, among other reasons, the argument would read Section 4929.11, which clearly authorizes these mechanisms, out of the Revised Code.

OCC's and OPAE's opposition to consolidation also has no merit. By consolidating the review of the application with the pending rate case, the parties opposing the application would fully participate in the investigation, discovery and hearings related to the application. Thus, consolidation will not prejudice either party. Although OCC and OPAE assert that they now

face discovery burdens, this is simply not true. The application here merely presents a methodology for recovering certain costs; any costs to be potentially recovered will be reviewed later. (OCC, in fact, has already begun its discovery relating to the application by submitting discovery requests on that subject.)

However the Commission responds, the rate case should not be tolled. The Commission has no authority to do so.

For these reasons, as demonstrated below, DEO respectfully requests that the Commission deny OCC's Motion to Dismiss and grant DEO's Motion to Consolidate.

II. ARGUMENT

A. Because DEO's Application Was Authorized By and Appropriately Filed Under R.C. 4929.11, the Application Should Not Be Dismissed.

Under R.C. 4929.11, the Commission possesses the authority to approve applications for automatic adjustment mechanisms, such as the one filed in this case. The statute provides:

Nothing in the Revised Code prohibits, and the public utilities commission may allow, any automatic adjustment mechanism or device in a natural gas company's rate schedules that allows a natural gas company's rates or charges for a regulated service or goods to fluctuate automatically in accordance with changes in a specified cost or costs.

As the Commission has noted, "The plain language of [R.C. 4929.11] enables the Commission to consider and implement an adjustment mechanism The fundamental question . . . is whether the proposed adjustment mechanism is just and reasonable." In re Joint Application for Approval of an Adjustment Mechanism to Recover Uncollectible Expenses ("The Uncollectible Expenses Rider Case"), Finding & Order, Case No. 03-1127-GA-UNC (Dec. 17, 2003).

DEO's application falls squarely within R.C 4929.11. DEO seeks approval of "an automatic adjustment mechanism" that will allow DEO's "rates or charges for a regulated service" (i.e., "rate schedules GSS, ECTS, LVGSS, LVECTS, GTS, TSS, and DTS") to

"fluctuate automatically in accordance with changes in a specified cost or costs" (i.e., the "costs associated with a 25-year Pipeline Infrastructure Replacement program"). (Application at 1.)

R.C. 4929.11 is not only an appropriate statute; it is the *most* appropriate statute under which to seek approval of this application.

The Commission has approved automatic adjustment mechanisms under R.C. 4929.11 and, contrary to the movants' suggestion, not as alternative rate plans or as a result of rate cases. See, e.g., The Uncollectible Expense Rider Case, Case No. 03-1127-GA-UNC. Indeed, OCC recently vouched in a stipulation that Commission approval of an infrastructure rider (like DEO's, filed under R.C. 4929.11 and the UNC designation) "violate[d] no regulatory principle or precedent." See In re the Application of Columbia Gas of Ohio, Inc. for Approval of Tariffs to Recover Through an Automatic Adjustment Clause Costs Associated with the Establishment of an Infrastructure Replacement Program and for Approval of Certain Accounting Treatment, Case No. 07-478-GA-UNC, Amended Stipulation & Recommendation, at 2 (Dec. 28, 2007).

Although R.C. 4929.11 authorizes DEO's application, it does not state which procedures govern applications for automatic adjustment mechanisms. This may be a moot point. If the pending motion to consolidate is granted, the procedures that apply to the application will be those applicable to the remainder of the rate case. If the consolidation motion is denied, then the Commission would be free to fashion its own procedures in compliance with R.C Chapter 4903 which provides the Commission with the general power to investigate and hold hearings in the exercise of its powers and duties. R.C. 4903.02 states that the "commission may . . . examine under oath . . . any officer, agent, or employee of any public utility . . . or any other person, in relation to the business and affairs of such public utility" and "may compel the attendance of such witness" to assist it "in the performance of any" of its "powers or duties." (Emphasis added.) See also, e.g., R.C. 4903.03 (allowing examination of records); R.C. 4903.04 (allowing compulsion of witnesses). These statutes provide a procedural vehicle for the Commission to carry out "any" of its "powers and duties," including its authority under R.C. 4929.11 to "allow[] any automatic adjustment mechanism."

These procedural powers are discretionary. The Commission "may" use them, but it need not. See, e.g., R.C. 4903.02. Thus, in The Uncollectible Expense Rider Case, Case No. 03-1127-GA-UNC, the Commission acted lawfully and appropriately when it did "not believe a hearing was necessary" to evaluate a joint, uncollectible-expense-rider application. Id., Finding & Order at 4. As in this case, that application was filed under R.C. 4929.11 and the UNC designation.

Of course, if the Commission consolidates the Pipeline Infrastructure Application with DEO's rate case, the procedures for the review of the application will be those that apply to the remainder of the rate case. Consolidation will provide OCC and OPAE with procedural rights, including discovery (which OCC has already begun) and participation in a hearing, with the ability to present evidence and make arguments on the application.

Citing the Commission's order in *The Uncollectible Expense Rider Case* (which approved an R.C. 4929.11 rider without a hearing), OCC asserts that this Commission has established a "three-prong test" to "qualify for the special treatment under R.C. 4929.11." (OCC Memo. at 11.) According to OCC, DEO must establish: (1) there is extreme volatility in the expenses to be collected by the rider; (2) DEO lacks control over the volatility; and (3) the current amount of money allotted for the costs is no longer appropriate. (*Id.*) Neither R.C. 4929.11 nor any other part of the Revised Code contains such a test. OCC's test is revisionist history of the Commission's analysis.

In *The Uncollectible Expense Rider Case*, the Commission expressly stated the test to be applied under R.C. 4929.11: "The fundamental question before us is whether the proposed adjustment mechanism is just and reasonable." *Id.*, Finding & Order at 10, Case No. 03-1127-GA-UNC (Dec. 17, 2003). The Commission then noted that it "accept[ed] *the applicants'* rationale supporting the adjustment mechanism." *Id.* at 10–11 (emphasis added). That rationale included the underlying volatility of uncollectible expense and the inability of the companies to control the causes of volatility. *Id.* The Commission also rejected arguments that current base rates adequately covered these costs. *Id.* at 11. Consequently, contrary to OCC's mischaracterization of precedent, DEO's application must be judged by whether it is just and reasonable, not by whether the specific rationale that justified an uncollectible expense rider also justifies a pipeline infrastructure replacement rider.

Even if OCC's suggested test *did* govern, the instant application would pass it. First, the costs to be recovered potentially under the rider here will change constantly as DEO replaces aging infrastructure of varying vintage, type, and condition across a large, diverse geographic area over a 25-year period. It is inconceivable that annual spending within the program will be

stable or predictable over that entire time span. Second, DEO has no control over the cause of these costs. Recent events like the water main breaks at Cleveland's Public Square and Columbus's Convention Center remind that the need for infrastructure repair and replacement are like "time and tide" because each "waits for no one." Nor does DEO have total control over the timing of these costs. In addition to the exigencies of dealing with managing infrastructure that must exist in rugged conditions, any proposed costs sought to be recovered must be reviewed with Staff and approved by the Commission. As acknowledged on page 13 of the application, DEO will seek Staff review of "the nature, timing, and magnitude of capital expenditures in the PIR program." Third, OCC does not suggest (nor could it) that DEO's current rates cover the proposed projects.

Ultimately, whatever the substantive test, OCC misses the point by raising these issues at this stage of the proceeding. Whether DEO's application is substantively "just and reasonable"—or passes some other test (e.g., whether the costs to be recovered potentially are "volatile")—is a matter for hearing and not proper grounds for dismissal.

B. The Rider Application Is Neither an Application for an Increase in Rates Nor An Alternative Rate Plan Application.

Despite the plain authorization for its application found in R.C. 4929.11, OCC and OPAE suggest that DEO misfiled its application. They suggest that DEO's application is in fact either:

(a) an application for an increase in rates that must be filed in accordance with Chapter 4909 and the Standard Filing Requirements (see OCC Memo. at 6; OPAE Memo. at 3); or (b) an alternative rate plan that must be filed in accordance with R.C. 4929.05 (see OCC Memo. at 13; OPAE Memo. at 2). OCC and OPAE are wrong on both counts.

1. Because Rates Will Not Increase upon Approval of DEO's Application, this Application, Like Rider Applications Generally, Is Not for an Increase in Rates.

OPAE and OCC's argument that this is a rate increase application is fundamentally flawed because the application here will not presently increase rates. The extensive procedural requirements of R.C. 4909.18 only apply "[i]f the commission determines that [the] application is for an increase in any rate." The proposed tariff sheet filed with DEO's application provides that the initial charges for each gas service schedule is "\$0.00/month" or "\$0.00/Mcf," depending on the schedule. Rates simply will not increase upon approval of this application.

To support its contention the instant application is an application to increase rates, OCC relies solely on the cumulative dollar amount that DEO now proposes to spend over 25 years and potentially to collect over 75 or more years. But a later rate impact does not transform a rider application into a rate case. More specifically, even if an application increases the amount customers must pay, it is not necessarily an R.C. 4909.18 rate increase application. For example, in *Ohio Consumers' Counsel v. Pub. Util. Comm.*, 110 Ohio St.3d 394, 2006-Ohio-4706, the Ohio Supreme Court recently affirmed that the Commission acted lawfully when it approved a rate increase resulting from settlement of an R.C. 4905.26 complaint case. There, OCC argued that the Commission "should have enforced various statutory requirements that apply to utility rate increases" in approving an agreement, reached in a complaint proceeding, that allowed recovery from customers of billing-related costs. *Id.* ¶ 24. The Court rejected this argument, noting that it had "repeatedly held that utility rates may be changed by the PUCO in an R.C. 4905.26 complaint proceeding such as this, without compelling the affected utility to apply for a rate increase under R.C. 4909.18." *Id.* ¶ 29.

Similarly, the Court has held that automatic adjustment mechanisms, similar in operation to the one proposed here, do not constitute ratemaking. In *River Gas Co. v. Pub. Util. Comm.*

(1982), 69 Ohio St.2d 509, 513, the Court held that variable mechanisms that pass costs through to consumers do not "constitute[] ratemaking in its usual and customary sense," even though such mechanisms have an impact on rates. That case involved the purchased gas adjustment statute, R.C. 4905.302. The question presented was whether the Commission, by ordering refunds under that statute, "engaged in unlawful, retroactive ratemaking." *Id.* at 512.

The Court pointed out that "before there can be retroactive ratemaking, there must, at the very least, be ratemaking." *Id.* The Court explained that approval of the pass-through mechanism was *not* ratemaking: "In contrast [to rate-increase applications under Chapter 4909], the fuel cost adjustment provisions . . . represent a statutory plan which authorizes a utility to pass variable [gas] costs directly to consumers." *Id.* Although "[r]ates are thereby varied," they varied "independently from the formal rate-making process"; therefore, it did "not appear that application of the UPGA constitutes ratemaking in its usual and customary sense." *Id.* (internal quotation marks omitted); *see also Consumers' Counsel v. Pub. Util. Comm.* (1979), 57 Ohio St.2d 78, 82–83 (same holding in context of electric fuel cost recovery under R.C. 4905.301).

Given that variable pass-through mechanisms do not constitute ratemaking, the movants' argument that DEO's application is for an increase in rates is simply wrong. The application, authorized by R.C. 4929.11, is part of "a statutory plan which authorizes a utility to pass variable [pipeline infrastructure replacement] costs directly to consumers." *See River Gas Co.*, 69 Ohio St.3d, at 513. The fact that a different kind of cost was involved in *River Gas* (gas costs) than here (pipeline infrastructure replacement costs) is a distinction without a difference. Both costs are variable; both costs have a rate effect; both costs are passed directly through to consumers; and both mechanisms are authorized by statute. As was the case for the parties in *River Gas*, OCC and OPAE here will receive all necessary procedural protections—notice of the

application, full discovery rights (indeed, OCC has already submitted discovery), and a hearing at which it will have the opportunity to present and cross-examine witnesses. Like *River Gas*, this case does not involve a request to increase rates, and this application need not comply with the requirements governing rate increase applications.

2. DEO's Application Is Not for an Alternative Rate Plan.

OCC and OPAE also argue that DEO should have filed an alternative rate plan under R.C. 4929.05. OCC and OPAE are wrong again. Automatic adjustment mechanisms are authorized by R.C. 4929.11. That section does not require that applications for such mechanisms must be filed as alternative rate plans or be approved otherwise under R.C. 4929.05. Indeed, no statute requires that automatic adjustment mechanisms be filed in any particular way.

OCC points to the definition of the term "alternative rate plan" in R.C. 4929.01(A) and argues that this definition requires all rider applications be filed as alternative rate plans. OCC misreads the statute. In fact, the Commission has previously rejected the argument that OCC makes here. In re Applications of Pike Natural Gas Co. for Approval Pursuant to Revised Code Section 4929.11, of Tariffs to Recover Uncollectible Expense Pursuant to an Automatic Adjustment Mechanism, Case No. 04-1339-GA-UEX, Finding & Order at 4 (Jan. 26, 2005). In that case, involving an application to approve an uncollectible expense rider, OCC moved to dismiss the application, arguing that R.C. 4929.11 "does not . . . permit the filing of these applications absent the filing of an alternative rate plan." Id. at 4. The Commission held that "OCC's motion to dismiss is not well made and should be denied." Id. at 7. That case was correctly decided.

R.C. 4929.01(A) does not state that automatic adjustment mechanisms either constitute or must be filed as alternative rate plans. R.C. 4929.01(A) states, "Alternative rate plans also may include, but are not limited to, automatic adjustments based on a specified index or changes in a

specified cost or costs." (Emphasis added.) The statutory language is permissive—not mandatory—regarding the inclusion of automatic adjustments within an alternative rate plan. In contrast, OCC reads the statute to *mandate* inclusion. The statute contemplates that alternative rates could include automatic adjustments, among other things. It also contemplates that automatic adjustments could not be part of such plans. There is nothing in the statute which says that an alternative rate plan must include automatic adjustments or that an automatic adjustment mechanism must be filed as part of an alternative rate plan.

Indeed, OCC ignores differences between R.C. 4929.01(A) and R.C. 4929.11, which describe different subjects and accomplish different purposes. R.C. 4929.01(A) allows "alternative rate plans" to include "automatic adjustments." R.C. 4929.11 authorizes an "automatic adjustment mechanism or device." Thus, R.C. 4929.01(A) allows an alternative rate plan to include an automatic adjustment of some kind, whereas R.C. 4929.11 authorizes a standalone "mechanism" that exists independently from an alternative rate plan.

Importantly, if R.C. 4929.01(A) was to be interpreted as OCC suggests, then there would be no reason for R.C. 4929.11. Under OCC's reading, which equates "automatic adjustments" with "automatic adjustment mechanism," R.C. 4929.11 would merely restate an authorization already present in R.C. 4929.01(A). Thus, R.C. 4929.11 would be redundant and unnecessary.

There can be no dispute that "[s]tatutes should not be construed to be redundant, nor should any words be ignored." *East Ohio Gas Co. v. Pub. Util. Comm.* (1988), 39 Ohio St.3d 295, 299. Contrary to what OCC suggests, R.C. 4929.11 must be read to independently provide authority for automatic adjustment mechanisms in order to give full effect to both sections. Thus, under R.C. 4929.05, a company may apply for an alternative rate plan that "may include," among other things, automatic adjustments. Or, under R.C. 4929.11, a company may apply for a stand-

alone automatic adjustment mechanism that operates independently from traditional rates.

OCC's interpretation, on the other hand, would simply read Section 4929.11 out of the Revised Code.

C. Even If the Application Should Be Considered to Be an Alternative Rate Plan, the Application Need Not Be Filed as a Rate Case.

OCC argues that an alternative rate plan must always be filed as a rate case. This is not true. Assuming that the application is such a plan, it need not be filed as part of a rate case.

Thus, even if the application here is an alternative rate plan, DEO's application is proper.

OCC relies on R.C. 4929.05(A), which provides, "As part of an application filed pursuant to section 4909.18 of the Revised Code, a natural gas company *may* request approval of an alternative rate plan." (Emphasis added.) This is a permissive statement—a company "may" file an alternative rate plan as part of an application under R.C. 4909.18.²

OCC not only insists that this permissive statement *mandates* that all alternative rate plan applications be filed in the course of rate increase applications, but goes much further. OCC asserts that this statement incorporates into alternative rate plan cases all the procedural and substantive requirements of an application for an increase in rates. This would include the prefiling notice requirements, the standard filing requirements, and application of the R.C. 4909.15 rate formula. (*See* OCC Memo. at 9 ("Whenever a utility desires to increase its rates and collect more money from its customers, it must comply with the procedures set forth in R.C. 4909.18 and R.C. 4929.05 *and* the rate formula promulgated under R.C. 4909.15") (emphasis added).) OCC's position is not tenable.

² This is precisely what DEO did in its rate case, as its proposed decoupling rider was filed under R.C. 4929.05.

To begin with, as it did with its interpretation of R.C. 4929.01(A), OCC turns a permissive statement in R.C. 4929.05(A) into a mandatory one. Nothing requires that an alternative rate plan be filed as part of a rate case. As R.C. 4929.05(A) states, such plans "may" be filed as part of a rate case.

Other statutory language in Chapter 4929 also undercuts OCC's argument. For example, OCC's position conflicts with the definition of an alternative rate plan. According to R.C. 4929.01(A), an alternative rate plan is "a method, alternate to the method of section 4909.15 of the Revised Code, for establishing rates and charges." (Emphasis added.) It would be simple nonsense to have this language mean, as OCC would suggest, that an "alternate method to using R.C. 4909.15" requires using R.C. 4909.15.

Although the language of the statutes control, common sense and state policy confirm the rejection of OCC's position. R.C. 4929.05, by its terms, is intended in part to "minimize the costs and time expended in the regulatory process." *See also* R.C. 4929.02(A)(6) (stating that Ohio policy is to encourage the "development and implementation of flexible regulatory treatment"). OCC's suggestion that alternative rate case applications are no different (or even more onerous) than rate-increase applications is inconsistent with the language of Chapter 4929 and the policy underlying those statutes. OCC's position should be rejected.³

³ If the Commission finds that the application is governed by R.C. 4929.05, dismissal is not required. If any part of DEO's filing is noncompliant, it will not be difficult to bring its filing into compliance.

As part of its pending case 07-830-GA-ALT, DEO is already applying for the findings required under R.C. 4929.05. These findings are largely company—not plan—specific. See R.C. 4929.05(A)(1) (requiring a finding that "[t]he natural gas company is in compliance with section 4905.35 of the Revised Code and is in substantial compliance with the policy of this state specified in section 4929.02 of the Revised Code") (emphasis added). To the degree DEO must update any of its current filings to reflect the addition of the PIR rider, it can do so.

Procedurally, R.C. 4929.05 merely requires "notice, investigation, and a hearing," and DEO has already provided notice to OCC and OPAE, as well as all parties to its rate case and to the public officials listed in Exhibit B to this Memorandum. (Exhibit A is the letter that was sent to those officials.) The remaining requirements (an investigation and hearing) will also be satisfied following consolidation. To the degree any Commission-created regulatory requirement was missed, the Commission is empowered to "waive any provision in [the alternative-rate-

D. Consolidation Will Not Prejudice OCC or OPAE.

If the application is consolidated with the rate case, OCC and OPAE will be entitled to participate in the proceedings, call and cross-examine witnesses, and present arguments on the application. They do not contest this, but argue that consolidation would "severely limit[] the ability of OCC and other intervenors to exercise their rights to ample discovery." (E.g., OCC Memo. at 18.) The movants, however, severely overstate the additional discovery burden the application poses.

Although OCC makes much of the cumulative total investment anticipated for pipeline infrastructure replacement, DEO's application does not require OCC (or anyone else) to conduct a massive cost audit now. No costs are being proposed for recovery at this time. Any costs potentially to be recovered are deferred for annual review at some future time. The application simply proposes a methodology for future cost recovery. OCC and OPAE do not face a crushing discovery burden as a result of this application. Indeed, OCC has already submitted a set of discovery regarding the application.

And it is not as if DEO's application presents issues of first impression to OCC. It has participated in at least three proceedings besides DEO's evaluating riders recovering the costs of varying levels of infrastructure replacement. See In re the Application of Columbia Gas-Ohio for Approval of Tariffs to Recover Through an Automatic Adjustment Clause Costs Associated with the Establishment of an Infrastructure Replacement Program, Case No. 07-478-GA-UNC; In re the Application of Duke Energy Ohio for Approval of an Alternate Rate Plan, Case No. 07-

⁽continued...)

plan] rules upon a motion for good cause shown, or upon its own motion." Ohio Admin. Code § 4901:1-19-03(A). DEO, if necessary, can cure any unmet requirement that the Commission does not see fit to waive.

590-GA-ALT; In re the Application of CG&E for Approval of an Alternative Rate Plan for Its Gas Distribution Service, Case No. 01-1478-GA-ALT.

Without a showing of prejudice, OCC's cries of prejudice ring hollow. See, e.g., Holladay Corp. v. Pub. Util. Comm. (1980), 61 Ohio St.2d 335, 335 ("The Supreme Court will not reverse an order of the Public Utilities Commission unless the party seeking the reversal demonstrates that the order has a prejudicial effect as applied to that party."). Consolidation, in short, will not prevent this case from running smoothly.

E. Whatever the Commission Does, It Should Not Toll DEO's Rate Case.

OCC suggests that the Commission, if it consolidates the cases, should toll DEO's rate case. OCC states that doing so "would essentially start the entire case over again." (OCC Memo. at 21.)

The problem with OCC's suggestion is that that the Commission lacks authority to do so. R.C. 4909.42, unlike R.C. 4929.01(A) and R.C. 4929.05(A), speaks in mandatory terms admitting no exception:

If the proceeding on an application filed with the public utilities commission under section 4909.18... requesting an increase on any rate... has not been concluded and an order entered... at the expiration of two hundred seventy-five days from the date of filing the application, the proposed increase *shall* go into effect upon the filing of an undertaking by the public utility.

(Emphasis added.) It would be an exercise in legislative futility if a statute designed to prevent the Commission from sitting on rate-increase applications could simply be tolled by Commission fiat. As the Supreme Court has stated, "The General Assembly has granted utilities the unequivocal right" to "place . . . proposed rates in effect . . . under R.C. 4909.42 without the PUCO's consent or interference." Columbus S. Power Co. v. Pub. Util. Comm. (1993), 67 Ohio. St.3d 535, 547 (reversing the Commission and holding that it was "unreasonable to deny

recovery of the expenses incurred to obtain timely rate relief through R.C. 4909.42") (emphases added). Even if some exception could be made for intransigent or disintegrating companies, DEO is not such a utility.

Notably, the authority relied upon by OCC does not lead to a different conclusion. The cases cited by OCC, all 20-years old or more, either contain only dicta, see In re Application of Cincinnati Bell, Case No. 84-1272-TP-AIR, at 4 ("we do not find it necessary to rule upon the Staff's motion [to toll] at this time"), or otherwise are not on point, see, e.g., In re Application of Lake Buckhorn Util., Case No. 86-518-WW-AIR (applicant failed to complete its application through filing of the two-month update and filed a petition for bankruptcy mid-case).

III. CONCLUSION

For the above reasons, DEO respectfully requests that the Commission grant DEO's Motion to Consolidate and deny OCC's Motion to Dismiss.

Respectfully submitted,

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ATTORNEYS FOR THE EAST OHIO GAS COMPANY D/B/A DOMINION EAST OHIO

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Memorandum Contra the Motion to Dismiss Dominion East Ohio's Pipeline Infrastructure Application by the Office of the Ohio Consumers' Counsel and its Reply to the Memoranda Contra Dominion East Ohio's Motion to Consolidate by the Office of the Ohio Consumers' Counsel and Ohio Partners for Affordable Energy was sent by ordinary U.S. mail and by e-mail to the following parties on this 26th day of March, 2008.

Interstate Gas Supply, Inc. John Bentine, Esq. Chester, Wilcox & Saxbe LLP 65 East State Street, Suite 1000 Columbus, OH 43215-4213 jbentine@cwslaw.com

The Neighborhood Environmental Coalition, The Empowerment Center of Greater Cleveland, The Cleveland Housing Network, and The Consumers for Fair Utility Rates Joseph Meissner, Esq.
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Ohio Partners for Affordable Energy David Rinebolt, Esq. P.O. Box 1793 Findlay, OH 45839-1793 drinebolt@aol.com Dominion Retail Barth E. Royer 33 South Grant Avenue Columbus, OH 43215-3927 barthroyer@aol.com Industrial Energy Users-Ohio Samuel C. Randazzo, Esq. McNees Wallace & Nurick LLC 21 East State Street, 17th Floor Columbus, OH 43215 sam@mwncmh.com

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mhpetricoff@vorys.com

Dominion East Ohio

Dominion East Ohio 1201 East 55th Street, Cleveland, OH 44103 Mailing Address: P.O. Box 5759 Cleveland, OH 44101-0759

Robert W. Varley
Managing Director, State & Local Affairs-Midwest

February 29, 2008

Dear Public Official:

I want to inform you that Dominion East Ohio has filed an application with the Public Utilities Commission of Ohio (PUCO) seeking approval to implement a major pipeline replacement program. It is important that you are aware of this proposal and what it will mean to you and your constituents.

The proposed 25-year program is designed to replace nearly 20 percent of the company's 21,000-mile pipeline system. Under the program, Dominion East Ohio is also requesting approval to assume ownership and responsibility for natural gas service lines, which connect our mainlines to customers' premises. Currently, customers own these service lines and are solely responsible for any necessary repair or replacement.

Like other utilities with an aging infrastructure, this is a major investment to modernize and protect the integrity of our pipeline system. We plan to utilize a focused, methodical and prioritized approach to replacing approximately 4,100 miles of Dominion's system to ensure continued safe and reliable natural gas service to customers in the future. The pipelines recommended for replacement are older pipelines that are either cast- or wrought-iron or bare steel pipelines that do not have the coating or corrosion protection used today.

The total cost of the program is expected to exceed \$2.6 billion in 2007 dollars. If the application is approved as filed, Dominion estimates that the additional cost to residential customers will be \$1.12 per month beginning in November 2009. Thereafter there would be annual adjustments of no more than \$0.90 per month. The program would result in approximately a 1-percent increase in annual bills.

Dominion East Ohio will work closely with the PUCO staff in formulating specifics for the program. We also look forward to working closely with you and other officials in your community in planning gas pipeline replacement projects. We want to coordinate our pipeline replacement work with any other infrastructure projects planned for your community, such as water or sewer line replacement and road widening or repaving, to maximize efficiency and minimize traffic and other potential disruptions.

Please feel free to contact me by telephone, (216) 736-6207, or by e-mail at Robert. W. Varley@dom.com, if I can address any questions or concerns you might have.

Sincerely,

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Newton Falls Jack Haney	Mentor John I	Louisville Thoma	Kent Dave Ruller		East Palestine Patrick			Chargrin Falls Bent Himes	Canal Fulton Mark Cozy		Ashtabula City Anthor				Bath Township -Allen Co. William		sioners	æk - Allen Co.				Sity Heights					Marie Heichts Robert	Š	ghts		äghts		d Heights			7	Bratenahi Village Fred Fritte		_		Euclid Lisa N	Wadsworth Chris	Macedonia Rob J	Marietta Willian			Shaker Heights Karin	1 (2)(3)
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City Manager	City Manager	City Manager	City Manager	City Manager	City Manager	City Manager	City Manager	City Manager	City Menager	City Manager	City Manager	City Engineer & Service Director	Chief Building Commissioner	Chairman- Trustees	Chairman of Trustees	Chairman of Trustees	Chairman Commissioner	Chairman - Trusteesc	Building, Zoning and Utilities Commissic 3487 South Smith Road	Building Commissioner	Building Commissioner	Building Commissioner	Building Commissioner	Building Commissioner	Building Commissioner	Building Commissioner	Building Commissioner		Building Commissioner	Building Commissioner	Building Commissioner	Building Commissioner	Building Commissioner	Building Commissioner	Building Commissioner	Building Commissioner	Building Commissioner	Building Commissioner	Asst. to Mayor for Economic Developme 46 North Avenue	Assistant to the City Manager	Assistant To Mayor	Assistant Service Director	Assistant Service Director	Assistant Safety Service Director	Assistant Clerk & Secretary to Commiss 105 Main St.	Administrative Asst. to Mayor/Clerk of C 4863 East 71st Street	Administrative Asst. to Mayor	
19 North Canal Street	8500 Civic Center	215 South Mill Street	319 S. Water Street	44 North Forest Street	75 East Main Street	294 Main St	244 Main Street	21 W. Washington Street	155 E. Market	165 Center Road	4717 Main Avenue	14340 Euclid Avenue	10075 Ravenna Road	2530 Fort Amanda Road		Sugar Creek Township Administration	214 W. Livingston	4130 W. Lincoln Highway	ic 3487 South Smith Road	28730 Ridge Rd.	6848 Hathaway Road	2300 Warrensville Ctr. Road	34200 Bainbridge Road	3400 Lee Road	7325 Suramit View Drive	5206 Dover Center Road	5353 Lee Road	LOCAL DISCONDING TALL	7311 Valleyview Rd.	29555 Pettibone Road	5407 Turney Road	585 E. 222nd Street	40 Severance Circle	7619 Memohis Avenue	6361 Engle Road	9543 Broadview Road	411 Rratenahi Road	5/6 West Park Avenue	ne 46 North Avenue	27 E. Main Street	585 E. 222nd Street	120 Maple Street	9591 Valleyview Rd.	301 Putnam Street	ss 105 Main St.	C 4863 East 71st Street	3400 Lee Road	OLO LEIGHE CHAN
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Angelo Nuzzo Kerry Metzger	Randall DeVaul	Larry C. Kleinhans	Dorothy Montgomery	Don Madden	Edward Kenily	Scott Wiccam	App Obsorbe	Haber Diat	Michell Schumacher	Mark Forni	John N. Bergman	Hugh Core	No Kramer	Clair Dudgeon	Clair Dudgeon	Dale DeLoye	Daniel P. Troy	Raymond (E.) Sines	Vincent T. Schroeder	Robert A. Riepenhoff	James (Jim) Seldenright		Larry Steinel	Sam Cook	Dan Relff	Sam Bassett	Greg Sneary	Gerald Potter	Inny F Cross	Russell W. Ludwig	Edward Ingold	David Spahr	Emily Weston	Kathleen Thompson	Grant Daughtery	Jimmy Dimora	Timothy F. Hagan	Mary Samide	William Young	Craig Albert	Bud Nuding	Arry Elszaz	Joa Schlegel	Thomas B. (Tom) Smith	Diane Austen	Teresa Smith	Linda Biniker	Judy Began	Robert C. Downey Jr.	Rifa C. McMahon	
Commissioner, Dept. of Airport Relation: 6161 Engle Road Commissioners 125 E. High Ave.	Commissioner of Engineering & Constru601 Lakeside Ave.	Commissioner - Chair	Commissioner	Commissioner	Commissioner	Commissioner	Commissioner	Commissioner	Commissioner	Commissioner	Commissioner	Commissioner	Commissioner	Commissioner	Commissioner	Commissioner	Commissioner	Commissioner	Commissioner	Commissioner	Commissioner	Commissioner	Commissioner	Commissioner	Commissioner	Commissioner	Commissioner	Commissioner	Commissioner	Commissioner	Commissioner		Commissioner	Commissioner	Commissioner	Commissioner	Commissioner	Commissioner	Commissioner	Commissioner	Commissioner	Clerk, Lake County Commissioners	Clerk of Trustees	Clerk of Commissioner's Office	Clerk of Commissioners	Clerk of Commissioners	Clerk - Troy Township Trustees	City Manager's Secretary	City Manager & Public Safety Director	Cay Managay	
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	Room 518	129 E. Court									Room 201	Rom 201	Room 201			129 E. Court									Room 30	Room 30	Room 30	Suite 100	Suite 100	Suite 100																				P.O. Box 601	
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Brian Hurtuk	David H. Roche	John Fulmer	William Horvath	Lyte Baker	David Handwerk	Dale Boroff	Beatrice Greenlee	Daryl Revoldt	Jeannine Case	Sunsan C. Renda	William Buckholtz	Glenn Gamber	Paul Bertram	Jackie Albers	Jan Tulkey	John Burkhart	Kevin Lammon	David Beazley	William Goncy	Danita Jo Love-Marshall	Dan Stechschulte	Roberi (R) Rosebrugh	Mauro Novello	Nancy Marincic	Norman Bringman	Anthony F. Bertone	Edmund Gudenas	Chuck Hillier	Derek Elshaw	Gary Norton	Alvin McGee	Ralph Jarvis	Lorilai Livingston	Frank Stocz	James Jones	James Lauer	W. Woody Wolters	Bill Self	Allen Schulmen	William Vansuch	Noel Ebling	Richard Balbier	John E. Frey	Michael Gammella	Mary Beckenbach	Dave Ferguson	Phil Saunders	Tanya Cady	Karen Carmen	Menybeth Vaughn	Barbara Mohnacsky	Robert E. (Bob) Aufuldish
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21012 Hilliard Blvd.	457 Richmond Road	3758 Center Road	P.O. Box 601	207 North Main Street	207 North Main Street	PO Box 246	10455 Northfield	145 North Main Street	75 Prentiss Street	4350 SOM Center Road	6821 Wilson Mills Road	100 City Hall Street S.E.	301 Putnam Street	5353 Lee Road	9699 Valleyview Rd.	156 North Water Street	142 E. Main Street	111 W. Franklin	45 E Boston Mills Rd.	3700 Northfield Road	203 N Main St	44 North Forest Street	1470 Chargrin River Road	5407 Turney Road	20777 Lorain Rd.	220 Third Street	585 E. 222nd Street	35150 Lakeshore Blvd.	35150 Lakeshore Blvd.	14340 Euclid Avenue	130 South Cedar Street	24 S. Portage St	110 W Main St	400 North High Street	294 Main St.	244 Main Street	610 West Sycamore St.	202 N Main St	218 Cleveland Avenue S.W.	351 Tenney Avenue	519 Wall St	7619 Memphis Avenue	7619 Memphis Avenue	6161 Engle Road	411 Bratenahi Road	715 Park Dr.	5661 Perkins Road	6800 Brecksville Rd.	25325 Fairmount BL.	470 Main Street - Bldg. #4	470 Cerrier Street - Bidg. #4	105 Main St.
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Rocky River	Richmond Heights	Perry	Painesville	Orville	Onville	Ohio City	Northfield	North Canton	Munroe Falls	Moreland Hills	Mayfield Village	Massillon	Marietta	Maple Heights	Macedonia	Loudonville	t (Leipsic	Kenton	Hudson	Highland Hills	Glandorf	Geneva	Gates Milts	Garfield Heights	Fairview Park	Fairport Harbor	Euclid	Eastlake	Eastlake	East Cleveland	East Canton	Doylestown	Cridersville	Contiand	Conneaut	Conneaut	SiColdwater	et Celina	Canton	Campbell	Cairo	Brooklyn	Brooklyn	Brook Park	Bratenahi	Belpre	Bedford Heights	independence	Beachwood	Chardon	Chardon	Painesville
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Kathleen Meckstroth	John Ferlito	Alfred (Bill) McNicoli	Sally Kennedy	Ron Winne	Richard (Dick) D'Antonio	Jeff Fusco	David Lieberth	James Masturzo	Laraine Duncan	Robert Bowman	Cathie DeFazio	Gary D. Adams	Anthony Trafficanti	John McMale	Pichard Lude	Paul Helizei	Daniel Polivka	Christopher Smeiles	Maureen Frederick	Charles W. Keiper, II	James (Jim) Hoppel	Dave Cranmer	Deborah Newcomb	Bob Boggs	Joseph Moroski	Thomas (Tom) Wheaton	Jane Vignos	Todd Bosley	Gregory Kurtz	Robert M. Seelie	Richard Bashore	Johnston Miller	Inomas Marrie	Helen Dunlap	Martin J. Sweeney	Charles Sammarone	Ed Knowton	James Jordon	Jim Moore	Wilhelmina Kamis	William Reid	Donald Bolden	Stephen Henderson	Thomas Stricker	Thomas Perk	Anthony Protogogo	Ed Barnett	
Health Commissioner	Health Commissioner	Health Commissioner	Health Commissioner	Executive Assistant to the Mayor	Deputy Service Director	Deputy Service Director	Deputy Mayor/Administration	Deputy Mayor - Labor Relations	Deputy Mayor - Intergovernmental Relat 166 S. High Street	Deputy Mayor - Economic Development 166 S. High Street	County Commissioner, Chair	County Commissioner - Vice Chair	County Commissioner	County Commissioner	County Commissioner	County commissioner	County Commissioner	County Commissioner	County Commissioner	County Commissioner	County Commissioner	County Commissioner	County Commissioner	County Commissioner	County Commissioner	County Commissioner	County Commissioner	County Commissioner	Councilman/Vice Mayor	Council President -Ward 3	Council President Ward 2	Council President Pro-Tem	Council President Pro Tem	Council President Pro Tem	Council President - Ward 20	Council President	Council President	Council President	Council President	Council President	Council President	Council President	Council President	Council President	Council President	Council President	Council President	
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CAM decident	Fairlawn			Eastlake	East Palestine	East Cleveland	East Canton	Daviestown	Dover	Dennison	Deiphos	Cuyahoga Heights	Cuyahoga Falls	Cridersville	Cortland	Conway	Columbus Grove	Coldwater	Clinton	Cleveland Heights	Linndale	Cleveland	Chargrin Falls	Celina	Canton	Canal Fulton	Campbell	Cairo	Burton Village	Brooklyn Heights	Brooklyn	Brook Park	Broadview Heights	Bracksville	Bratenahl Village	Botkins	Blufflon	Beverly	Belpre City Hall	Bedford Heights	Bedford	Beaverdam	Beachwood	Barberton	Village Of Reminderville	Aurora	apple creek	Anna	Alliance	New Franklin Village	Akron	Hudson	Youngstown
	Vallian Room	Bill Convenily	Ron Klonenstein	Ted Andrzeiewski	Raymond S. Hull	Eric J. Brewer	Reginald McGee	Terry Lindeman	Richard Homrighausen	Paul Collins	Gerald A. Neumeier	Jack Bacci	Don Robart	Robert E. Conner	Curt Moll	Bradley Guest	Michael Bogart	LaVern Stammon	Phyllis Mayberry	Edward Kelly	Joann Toczek	Frank Jackson	Thomas Brick	Paul Amold	William Healy	John Grogan	John E. Dill	Gerald Lamb	George Chittle	Michael Procuk	Kenneth Patton	Mark Elliott	Sam Alai	Jerry N. Hruby	John LiCastro	James King	Fred Rodabaugh	Clem Beidenbach	Mike Lorentz	Fletcher Berger	Daniel S. Pocek	John M. Howard	Merie S. Gorden	Bob Genet	Samuel Alonso	Lynn McGill	at miller	Julie Eheman	Toni Middleton	Al Bollas	Don Plusquellic	Douglas Elliott	Neil Altman
rea g C	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Interim City Manager	Health Commissioner
Stor South Sings Road	9497 CARRIO CARRO	SBS E 222nd Street	109 W North St	35150 Lakeshore Blvd.	75 East Main Street	14340 Euclid Avenue	130 South Cedar Street	24 S. Portage Street	100 E 3rd	302 Grant	608 N Canal St	4863 East 71st Street	2310 2nd Street	110 W Main St	400 North High Street	P.O. Box 310	113 E. Sycamore St.	610 West Syacamore St.	7871 Main St.	40 Severance Circle	4016 West 119 Street	601 Lakeside Ave.	21 W. Washington Street	202 N Main St	218 Cleveland Avenue S.W.	155 E. Market Str E #A	351 Tenney Avenue	519 Wall St	Village of Burton	345 Tuxedo Avenue	7619 Memphis Avenue	6161 Engle Road	9543 Broadview Road	9069 Brecksville Road	411 Bratenahi Road	210 S. Mill Street	101 W. Main Streett	609 Mitchell Ave.	715 Park Dr.	5661 Perkins Road	165 Center Road	101 W Main St	25325 Fairmount BI.	576 West Park Avenue	3601 Glenwood Blvd.	130 South Chillicothe	63 E. Main St.	209 W Main St.	504 E. Main St.	5611 Manchester Road	166 S. High Street	27 E. Main Street	345 Oak Hill Avenue
					646 West Clark StreEast Palestine											P.O. Box 297		505 W. Elizabeth Si Coldwater										P.O. Box 251	P.O. Box 408										PO Box 160									P.O. Box 444					
CHICARO	Fairlean			Eastlake	trr East Palestine	East Cleveland	East Canton	Doviesiown	Dover	Dennison	Delphos	Cuyahoga Heights	Cuyahoga Falls	Cridersville	Cortland	Convoy	Columbus Grove	SiColdwater	Clinton	Cleveland Heights	Cleveland	Cleveland	Chagrin Falls	Celina	Canton	Canal Fulton	Campbell	Cairo	Burton	Brooklyn Heights	Brooklyn	Brook Park	Broadview Heights	Brecksville	Bratenahi	Botkins	Bluffton	Beverly	Belpre	Bedford Heights	Bedford	Beaverdam	Beachwood	Barberton	Aurora	Aurora	Apple Creek	Anna	Alliance	Akron	Akron	Hudson	Youngstown
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4400000	44333-3007	44193-2000	45807	44095	44413	44112	44703	44230	44622	44621	45833	4125	44221	45806	44410	45832	45830	45828	44216-9485	44118	44135	44114	44022	45822	44702	44614	44405	45820	44021	44131	44142	44142	44147	44141	4 108	45306	45817	45715	45714	44146	44146	45808	44148	44203	44202	44202	44606	45302	440801	44319	44308	44236	44503

Struthers	City of Strutters	Sugar Bush Knolls	Streetsboro	Stow	St Marys	St. Henry	Spencerville	South Russell	South Firefict	Solon Cityai Cana	Silver Lake	Shreve	Shaker Heights	Seven Hills	Scott	Rocky River	Rockford	Richmond Heights	Richfield	Ravenna	Brady Lake	Poland	Peny Village	Perry Village	Pepper Pike	Peninsula	Pandora	Ottawa	Onville	Orange	Ohio City	Deleased Village	North	NOAN KANDAR	North Perry Village	North Olmsted	North Kingsville Village	N. Kingsville Village	North Canton	Niles	Newton Falls	Newburgh Heights	New Philadelphia	New Middletown	Matemoras Village	Munroe Falls	Moreland Hills	Mogadore	Mineral City	Middlepoint	Middlefield
Teny Stocker	Danki C. (Dan) Mamua	Raymond Venovec	Mark Pavlick	Karen Fritschei	Greg Freewalt	Laverne Schulze	Lynn Cummins	Matthew E. Brett	Georgine Web	Kevin A Patton	Warner Mendenhall	Keith Rickett	Earl Leiken	David Bentkowski	Fred Strawser	Pamela Bobst	Jerry Pontsler	Daniel J. Ursu	Michael Lyons	Kevin Poland	Hai Lehman	Christine Yash	Laurence Logan	John Fulmer	Bruce H. Akers	Michael Kaplan	Gary Hilly	Kenneth Maag	Dennis Steiner	Kathy Mulcahy	Buck Werts	Gary V Gottschalk		Carro Raioni	Inomas vallams	Thomas O'Grady	Ronald McVey	Cart D. Oxley	David Held	Ralph Infante	Thomas Moorehead	Derrick Klader	Ron Brodzinski	Robert T. (Bob) Carson	Johnny (JJ) Howell	Frank Larson	Charles M. DeGross	Steve Marks	Terry Nill	Chad Adams	Bill Poole Jr.
mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor
o Exil Sueet		PO BOX 212/	9164 Wate Route 43	3760 Darrow Road	103 E. Spring St.	121 W Washington St.	116 S. Broadway	5205 Chillicothe Road	1349 South Green	34200 Bainbridge Road	2961 Kent Road	150 W. McConkey	3400 Lee Road	7325 Summit View Drive	PO Box 111	21012 Hilliard Blvd.	142 N. Main St.	457 Richmond Road	441- W. Streetsboro Road	210 Park Way	2123 Merrill Road	308 South Main	3758 Center road	3758 Center Road	28000 Shaker Blvd.	6086 Riverview Road	102 S. Jefferson St.	136 N. Oak St.	207 North Main Street	4600 Lander	PO Box 246	24800 Broadway Avenue	4080 Columbia Whods Drive	A DARR NOTHER TORIC	9449 LOCKWOOD RO.	5206 Dover Center Road	Municipal Building	3541 E. Center Street	145 North Main Street	34 West State Street	19 North Canal	4000 Washington Park Blvd.	116 E. High Ave.	10711 Main Street	PO Box 693	43 Monroe Avenue	4350 SOM Center Road	135 S. Cleveland Avenue	8501 Short St.	103 N. Adems St.	14860 N. State Ave.
							316 E. Fourth St (h) Spencerville														,						PO Box 193										P.O. Box 253													PO Box 191	
Official	Struthore	Shuthan	Streetsboro	Stow	St. Marys	St. Henry	h)Spencerville	South Russell	South Euclid	Solon	Silver Lake	Shreve	Shaker Heights	Seven Hills	Scott	Rocky River	Rockford	Richmond Heights	Richfield	Ravenna	Ravenna	Poland	Perry Village	Репу	Pepper Pike	Peninsula	Pandora	Ottawa	Orrville	Orange Village	Ohio City	Oakwood Village	Norton	Northfield	North Randall	NORTH CHINGE	North Kingsville	North Kingsville	North Canton	Niles	Newton Fails	Newburgh Heights	New Philadelphia	New Middletown	New Matamoras	Munroe Falls	Moreland Hills	Mogadore	Mineral City	Middlepoint	Middlefield
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Aurora	Ashfabula City	Rocky River	Brooklyn Heights	Niles	New Middletown	Kirtland	Jefferson Village	Hubbard	Green	Eastlake	Cuyahoga Falls	Ashtabula City	Akron	Conneaut	Onville	Girard	Belpre City Hall	Struthers	Kenton	North Olmsted	Waite Hill Village	Wayne County Commissioners	Washington County	Watton Hills	Glenwillow	Glandorf	Kent	Youngstown	Wooster	Woodsheld	Woodmens	Windham	Wilshim	Willowick	Willoughby Hills	WICKING	Warrensvine Heights	Warren	Wapakoneta	Walton Hills	Waite Hill Village	Wadsworth	Chardon	Van Wert	Valley View	University Heights	Uhrichsville	Twinsburg	Timberlake	Talimadge	Sugarcreek
John Trew	Jim Rodgers	David Winterich	Ed Hatgas	Mina Miller	Janet Smith	Sally A. Harber	Michelle Ashley	Marytin Busek	Arny Sehm	Lois Sbrocco	Linda Williams	Lorraine Gonzalez	Gail Fielding	Patricia (Pat) Beckwith	Backy Jewell	Jerry Lambert	Dale Myers	John P. Sveda	Ronald R. Shaffer	Angelo Cammarato	Gary Danielson	Cheryi Noah	John Grimes	Jane Nowicki	Daisy Walker	Gene Warnecke	John Fender	Jay Williams	Bob Breneman	L. (William) Bolon	Yolanda E. Brodie	Jess Starkey	Sharon Krall	Richard J Ronda	kennath Lorenz	TOTAL ANGELOR	Marcia Fuoge	Michael O'Brien	Don Wittwer	Mariene Anielski	Arthur Baldwin II	Robin Laubaugh	TBA TBA	Don Farmer	Randali Westfali	Beryl E. Rothschild	James (Bucky) Myers	Katherine Procop	John Roskos	Christopher Grimm	Jeri Middaugh
Service Director	Service Director	Service Commissioner	Service & Street Commissioner	Secretary to the Mayor	Secretary to Mayor	Secretary To Mayor	Secretary To Mayor	Secretary to Mayor	Secretary to Mayor	Secretary To Mayor	Secretary to Mayor	Secretary To Mayor	Secretary to Mayor	Secretary To City Manager	Safety/Service Director	Safety/Service Director	Safety/Service Director	Safety Service Director	Safety Service Director	Public Works Commissioner	Public Service Director	President of Commissioners	President of Commissioners	Mayor's Secretary	Mayor's Secretary	Mayor/Zoning Inspector	Mayor and President of Council	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor	Mayor
158 West Pioneer Trail	4717Main Avenue	21012 Hilliard Blvd.	345 Tuxedo Avenue	34 West State Street	10711 Main Street	9301 Chillicothe Road	27 East Jefferson Street	220 West Liberty	P.O. Box 278	35150 Lakeshore BMd.	2310 2nd Street	4400 Main Avenue	166 S. High Street	244 Main Street	207 North Main Street	100 West Main Street	715 Park Dr.	6 Elm Street	111 Franklin St	24291 Lorain Rd.	7215 Eagle Rd.	428 West Liberty	205 Putnam St.	7595 Walton Road	29555 Pettibone Road	PO Box 154	319 S. Water Street	26 South Phelps Street	538 North Market Street	221 S. Main St.	27899 Chargrin Blvd.	9621 East Center Street	313 State St	30435 akeshore Blvd	35405 Chardon Rd	One Bublic Sales	4301 YESTERSYSTE CERTER ROAD	141 South St. SE	P.O. Box 269	7695 Walton Road	7215 Eagle Rd.	120 Maple Street	111 Water Street	515 E. Main Street	6848 Hathaway Road	2300 Warrensville Ctr. Road	305 E. 2nd St.	10075 Ravenna Road	11 Eastshore Blvd.	46 North Ave.	202 N. Broadway
																			PO Box 220																				701 Pariatte Court Wapakonela	•											
Aurora	Ashtabula	Rocky River	Brooklyn Heights	Niles	New Middletown	Kirtland	Jefferson	Hubbard	Greensburg	Eastlake	Cuyahoga Falis	Ashlabula	Akron	Conneaut	Onville	Girard	Belpre	Struthers	Kenton	North Olmsted	Waite Hill	Wooster	Marietta	Walton Hills	Gienwillow	Glandorf	Kent	Youngstown	Wooster	Woodsfield	Woodmere	Windham	V/Kishing	Willowick	Willoughby Hills		Wall Glisville	Warren	Wapakonela	Walton Hills	Waite Hill	Wadsworth	Village of Chardon	Van Wert	Valley View	University Heights	Uhrichsville	Twinsburg	Timberlake	Tallmadge	Sugarcreek
•	OH 44004	Ohio 44116	Ohio 44131	Ohio 44446	Ohio 44442		OH 44047	0	Ohio 44232-0278	_			0		Ohio 44667	Ohio 44420	Ohio 45714	Ohio 44471	Ohio 43326	Ohio 44070	Ohio 44094	Ohio 44691	Ohio 45750	Ohio 44146	Ohio 44139		_	Ohio 44503	Ohio 44691	_				_		Ohio 44094	Chio 4400			0	Ohio 44094		0	Ohio 45891	Ohio 44125	Ohio 44118	Ohio 44683		Ohio 44095	Ohio 44278	Ohio 44881

North Olmsted	Niles	Newburgh Heights	New Philadelphia	Mentor-On-The-Lake	Mayfield Village	Mayfield Village	Mayfield Heights	Massillon	Maple Heights	Macedonia	Lyndhurst	Louisville	Lakeline Village	Kirtland	Independence	Hunting Valley	Boston Heights	Hubbard	Hram	Highland Hills	Highland Heights	Geneva	Gates Mills	Garfield Heights	Fairlawn	Euclid	Eastake	East Cleveland	Dover	Delphos	Circahoga Hainhis	Concerno Falls	Copies Township	Concord Township	Corrord Township	Cleveland	Chester Township	Chardon Village	Canton	Campbell	Brooklyn	Brook Park	Broadview Heights	Brecksville	Bratenahi Village	Bedford Heights	Bedford	Beaverdam	Beachwood	Bath Township	Barberton
Duane Limpen	Maurice Guardino	Richard Pereces	Gary Espenschied	Dwayne Bailey	Doug Metzung	Douglas Metzung	Andrew Fornaro	Michael Loudiana	Lynn Rogens	Jim Crevar	Frederick Glady III	Walter Metzger	Greg Geisse	Carm Catania	David Snyderburn	George Evans	Charles Riedel	Al Patrick	Oran R. Dickson	Art Timmons	Tom Evans	Craig Zins	Dave Biggert	im McLauchlin	John Sellars	Hank Gulich	Mike Semik	Dwight E. Roach	David Douglas	Gnea Berauist	Soot Waldemarson	Volorie Way Carr	Donald William	Al lamas	Clay City	Mark Ricchuro	Chuck Mascella	Gayland Moore	Tom Bernabei	William J. VanSuch	Bob Kappier	George Hunt, Jr.	Ray Mack	Robert (Bob) Pech	Joseph (Joe) Zalar	Nick Baucco	Clint Bellar	Mack Shepherd	Dale Pekarek	John Peltier	Elwood Paimer
Selvice Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director
pzgo Posel Celles Knag	54 Vest Otate Oreg	AUDU VVSSnington Fair bivo.	116 E. High Ave.	5860 Andrews Rd.	6621 Wilson Mills Road	8621 Wilson Mills Road	6154 Mayfield Road	151 Lincoln Way East	5353 Lee Road	9691 Valleyview Rd.	5301 Mayfield Road	215 South Mill Street	33801 Lakeshore Bivd.	9301 Chillicothe Road	6800 Bracksville Rd.	38251 Fairmount Blvd	45 E. Boston Mills Road	220 West Liberty	P.O. Box 94	3700 Northfield Road	5827 Highland Road	44 North Forest Street	1470 Chargrin River Road	5407 Turney Road	3487 South Smith Road	585 E. 222nd Street	35150 Lakeshore Blyd.	14340 Euclid Avenue	100 E, 3rd.	608 N Canal St	4863 East 71st Street	2310 2nd Street	400 North High Street	1540 S. Cleveland-Massillon Rd.	7229 Rayenna Road	AD Contestance Tirely	12/01 Chilicothe	111 Water Street	218 Cleveland Avenue S.W.	351 Tenney Avenue	7819 Memphis Avenue	6161 Engle Road	9543 Broadview Road	9069 Brecksville Road	411 Bratenahl Road	5661 Perkins Road	165 Center Road	101 W Main St	25325 Fairmount BL	3864 W. Bath Road	576 West Park Avenue
																																																		P.O. Box 1186	
MOSCH CHINACO	North Olmehad	Niles	New Plaiadelphia	Mentor-On-Tine-Lake	Mayrield Village	Mayfield Village	Mayfield Heights	Massillon	Maple Heights	Macedonia	Lyndhurst	Louisville	Lakeline Village	Kirtland	Independence	Hunting Valley	Hudson	Hubbard	Hiram	Highland Hills	Highland Heights	Geneva	Gates Mills	Garfield Heights	Fairlawn	Euclid	Eastlake	East Cleveland	Dover	Delphos	Cuyahoga Heights	Cuvahoga Falis	Cortland	Copley	Concord Twp.	Cleveland Heinhis	Chestenand	Chardon Village	Canton	Campbell	Brooklyn	Brook Park	Broadview Heights	Brecksville	Bratenahl	Bedford Heights	Bedford	8eaverdam	Beachwood	Bath	Barberion
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	44070	4446	44505	44000	44143	44143	44124	44545	44737	44056	44124	44641	44095	44094	44131	44022	44236	44425	44234	44122	44143	44041	44040	44126	44333	44123-2099	44095	44112	44622	45833	44125	44221	44410	44321-1998	44077	44118	44114	44026 44024-0489	44/02	44405	44142	44142	44147	44141	44108	44146	44146	45808	44146	44210-1188	44203

Munson	Newbury Township	Newbury Township	Auglaize Township	Auglaize Township	Nelson Township	Chester Township	Bainbridge Township	Bainbridge Township	Chardon Township	Munson	Munson	Franklin Township (Summit Co.)	Franklin Township (Summit Co.)	Convoy	Walton Hills	Grand River Village	Clinton	Anna	Glenwillow	Willowick	North Randall	Woodmere	Willoughby Hills	Warrensville Heights	Wapakoneta	Walton Hills	Valley View	University Heights	Uhrichsville	Twinsburg	Timberlake	Tallmedge	Streetsboro	St Marys	St. Henry	South Russell	South Euclid	Solon	Silver Lake	Shaker Heights	Seven Hills	Rocky River	Rackford	Richmond Heights	Richfield	Ravenna	Pepper Pike	Painesville	Ottawa	Orange	Oakwood Village	Northfield
Frank J. Gliha	William Skomrock Jr.	Janice Blair	Anita Fetter	Blaine Brock	James Turos	Pat Mula	John Racic	Chris Hom	Donald F. Welker	Todd Ray	Mary E. Samide	Frances Kalapodis	Paul Adamson	Paul Kelly	Dan Stucky	Gery Buchs	Terry Siegenthaler	Jon Huismeyer	Robert Zahuranec	Joe Dominick	Charles Horvath	James A. Fisher	Nate Catania	A.P. Williams	Rex Katterheinrich	Mark Wilhelm	Ladd Soldat	Chris Vild	Jim Myers	Chris Campbell	James M. (Jim) Glasier	Dave Kline	Robert Langham	Mike Weadock	Donald Hess	Darrall Johnson	Ed Gallagher	Jim Stanek	Richard Ferwick	Bill Boad	William Bishilany	Jim Lindan	Jeff Long	Don Lazar	Melanie Tibbs	Donald J. Kainrad	Robert Girardi	Kevin Lynch	Jack Williams	Bruce White	Tom Haba	Anthony Fiorelli
Township Trustee Chairman	Township Trustee	Township Trustee	Township Trustee	Township Trustee	Township Trustee	Township Trustee	Township Trustee	Township Trustee	Township Trustee	Township Trustee	Township Trustee	Township Trustee	Fownship Trustee	Street Commissioner/Zoning Inspector	Street Commissioner	Street Commissioner	Street Commissioner	Service Director/zoning Inspector	Service Director/Street Commissioner	Service Director/Chief Bldg. Official	Service Director/Bldg. Commissioner	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director	Service Director
Munson Township	14899 Auburn Road	14899 Auburn Road	7726 Beliefontaine Road	7726 Bellefontaine Road	Nelson Community House	12701 Chillicothe	17828 Chillicothe Road	17826 Chillicothe Road	12340 Pearl Road	12210 Auburn Road	12210 Auburn Road	5611 Manchester Road	5611 Manchester Road		7595 Walton Road	205 Singer Avenue	2749 North Street	209 W Main St	_	31230 Vine Street	21937 Miles Road	27899 Chargrin Blvd.	35405 Chardon Rd.	4301 Warrensville Center Road	P.O. Box 269	7595 Walton Road	6848 Hathaway Road	2300 Warrensville Ctr. Road	City Hall	10075 Ravenna Road	11 Eastshore Blvd.	1178 Grovewood	2094 State Route 303	103 E. Spring St.	121 W Washington St	5205 Chillicothe Road	1349 South Green	6600 Cochran Road Road	2951 Kent Road	15600 Chagrin Blvd.	7325 Summit View Drive	21012 Hilliard Blvd.	142 N. Main St.	457 Richmond Road	4410 W. Streetsboro Road	210 Park Way	28000 Shaker Blvd.	7 Richmond St.	136 N. Oak St.	4600 Lander	24800 Broadway Avenue	10455 Northfield
12210 Aubum Road Chardon	P. O. Box 257	P. O. Box 257			PO Box 377													P.O. Box 140							701 Parlatte Court Wapakoneta				305 E. 2nd St.																			P.O. Box 601				
ac Chardon	Newbury	Newbury	Harrod	Harrod	Garrettsville	Chesterland	Chargrin Falls	Chargrin Falls	Chardon Township	Chardon	Chardon	Akron	Akron	Canvoy	Walton Hills	Grand River	Clinton	Anna	Glenwillow	Willowick	North Randall	Woodmere	Willoughby Hills	Warrensville	Wapakoneta	Walton Hills	Valley View	University Heights	Uhrichsville	Twinsburg	Timberlake	Tallmadge	Streetsboro	St Marys	St Henry	South Russell	South Euclid	Solon	Silver Lake	Shaker Heights	Seven Hills	Rocky River	Rockford	Richmond Heights	Richfield	Ravenna	Pepper Pike	Painesville	Ottawa	Orange Village	Oakwood Village	Northfield
Ohio	Ohio	OH _I O	오	오	오	Ohio	ᅋ	Ohio	Ohio	O D D	OHO.	OHO	Ohio	OHIO	Ohio	오	Ohio	OHO OHO OHO OHO OHO OHO OHO OHO OHO OHO	Ohio	암	Ohlo	오	OHIO	Ohio	오	OHO	Onio	Ohio	Qió	Q _{lio}	Ohio	<u>О</u> hio	Ohio	Ohio	O Dio	양	0,00	OFF	全	슬	Q _{lio}	OF OF	오	Ohio	양	<u>Ohio</u>	Ohio	Ohio	Ohio	Ohio	Ohio	Ohio
44024	44065	44065	45850	45850	44231	44026	44022	44022	44024	44024	44024	44319	44319	45832	44146	44045	44216	46302	44139	44095	44128	44122	44084	41128	45895	44146	4125	44118	44683	44087	44095	44278	44241	45885	45883	44022	4121	44139	44 22 4	44120	4131	£116	45882	44143	44286	44286	44124	44077	45875	44022	44146	44087

Deerfield Township	Perry Township - Allen Co.	Perry Township - Allen Co.	Perry Township - Allen Co.	Bazetta Township	Bazetta Township	Bazetta Township	Copley Township	Copley Township	Franklin Township	Franklin Township	Franklin Township	Concord Township	Concord Township	Monroe Township	Monroe Township	Monroe Township	Chester Township	Chester Township	Chester Township	Bainbridge Township	Chardon Township	Chardon Township	Canton Township	Canton Township	Canton Township	Canfield Township	Braceville Township	Braceville Township	Braceville Township	Boardman	Boardman	Richland Township	Richland Township	Richland Township	Bath Township	Bath Township	Barlow	Austintown Township	Austintown Township	Auburn Township	Atwater Township	Atwater Township	Savbrook Township	Ashtabula Township	Springfield Township	Springfield Township	Coventry Township	Coventry Township	Wood County	Wood County	Bainbridge Township	Aubum Township
Randy Wilbum	Dick Accordius	Frank Lamer	Jerry Mason	Jeffrey Bates	Michael (Mike) Piros	William (Bill) Glancy	Date Panovich	Scott Dressler	C. Arthur Sheam	Lynn Mikeseil	Kenneth Kohman	John W. Sherwood	Caroline N. (Connie) Luhta	John K. Van Meter	Richard L. Shafer	Steven L. Beam	Charles Stevens	Judy Caputo	Ron Cottman	Jeffrey Markley	Michael Brown	Steven Borawski	Jim Wilcox	Christoper Nichols	William Smith	Judith M. Bayus	Aaron Young	Clyde Luther	Dennis Kuchta	Thomas (Tom) Costello	Elaine R. Mancini	Donald C. Brauen	Gary Lugibihi	Rod Goldsberry	Elaina E. Goodnich	Jim Nelson	Don Yost	Jeffrey J. (Jeff) Groat	Warren (Bo) Pritchard	Eugene McCune Jr.	Gerald Loudin, II	Gerald Wiley	Peggy Carlo	Joseph J. Pele	Vince Mealy	Deborah Davis	Laurie Kieffer	Dave Buigrin	Robert Emans	Earl Hago	Susan Angelino	Susan Playcan
Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustae	Trustae	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Troy Township Trustee	Troy Township Trustee	Township Trustee Clerk	Township Trustee Clerk
1450 SR 14	2408 E. Breese Road	2408 E. Breese Road	2408 E. Breese Road	3372 State Route 5, N.E.	3372 State Route 5, N.E.	3372 State Route 5, N.E.	1540 S. Cleveland-Massillon Road	1540 S. Cleveland-Massillon Rd.	202 State St. PO Box 206	202 State St. PO Box 206	202 State St. PO Box 206	7229 Ravenna Road	7229 Ravenna Road	8500 Slabtown Road	8500 Slabtown Road	8500 Slabtown Road	12701 Chillicathe	12701 Chillicothe	12701 Chillicothe	17826 Chillicothe Road	12340 Pearl Road	9949 Mentor Rd.	4711 Central Ave. SE	4711 Central Avenue S.	4711 Central Avenue S.	21 South Broad Street	586 Nwfl-Braceville Robinson Road	586 Nwfl-Braceville Robinson Road	586 Nwfl-Braceville Robinson Road	8299 Market Street	8299 Market Street	8435 N. Dixie Highway	8435 N. Dixie Highway	8435 N. Dixle Highway	3864 W. Bath Road	3864 W. Bath Road	10507 SR 339	82 Ohliown Road	82 Ohllown Road	11010 E. Washington Street	1219 SR 183	1219 State Route 183	7247 Center Road	2716 North Ridge East	2458 Canfield Road	2459 Canfield Road	68 Portage Lakes Drive	68 Portage Lakes Drive	112 Main Street	215 Broadview	17826 Chillicothe Road	11010 E. Washington Street
																																			P.O. Box 1188	P.O. Box 1188					PO Box 117					2692 Hayne Road						
Deerfield	Cridersville	Cridersville	Cridersville	Contland	Contland	Contland	Copley	Copley	Conesville	Conesville	Conesville	Concord Twp.	Concord Twp.	Columbus Grove	Columbus Grove	Columbus Grove	Chesterland	Chesterland	Chesterland	Chargrin Falls	Chardon Township	Chardon	Canton	Canton	Canton	Carrileto	Braceville	Braceville	Braceville	Boardman	Boardman	Bluffton	Bluffton	Bluffton	Bath	Bath	Barlow	Austintown	Austintown	Auburn Township	Atwater	Atwater	Ashtabula	Ashtabula			Akron	Akron	Luckey	Luckey	Chargrin Falls	Aubum Township
Ohio	오	오	유	Ohio	Ohio	ONO	Q.	OHO	오	皇	오	2	£	오	웊	오	OHio	Ohio	Ohio	알	Ohio	알	Onio	Ohio	Ohio	Ohio	오	오	오	Ohio	Ohio	皇	모	오	숅	아	오	앍	오	OH:	오	9	오	ì	Ohio	Ohio	Ohio	Ohio	오	오	Ohio	Ohio
44411	45806	45806	45806	44410	44410	44410	44321-1998	44321-1998	43811	43811	43811	44077	44077	45830	45830	45830	44026	44028	44026	44022	44024	44024	44707	44707	44707	44406	44444	44444	44444	44512	44512	45817	45817	45817	44210-1188	44210-1188	45712	44515	44515	44023	44201	44201	44004	44004	44312	44312	44319	44319	43443	43443	44022	44023

Nimishillen Township	Nittishillett i Ownship	Ministrico Township	Showned Township	Bath Township Allen Co.		Warren Township	Warren Township	Warren Township	Jackson Township - Allen County	Jackson Township - Atten County	Jackson Township - Allen County	Franklin Township	Franklin Township	Brimfield Township	Brimfield Township	Brimfield Township	Jefferson Township	Jefferson Township	Shawnee Township	Hubbard Township	Hubbard Township	Hubbard Township	Hiram Township	Hiram Township	Hiram Township	Lake Township	Lake Township	Lake Township	Auglaize Township	SugarCreek - Allen Co.	Gomer	Nelson Township	Nelson Township	Freedom Township	Coordon Township	Fowler Township	Fowler Township	American Township Trustees	American Township Trustees	American Township Trustees	Chippewa Township	Chippewa Township	Chippewa Township	Palmyra Township	Palmyra Township	Palmyra Township	Marion Township	Marion Township	Marion Township	Deerfield Township	Deerfield Township
open open Lisa Shafer	MING CAUCH	Circle Cooki	Christi Brown	Michael Maeks	Doy Hollenbacker	Morm Ashley	Terry Ambrose	Kay Anderson	Thad Staley	Sam McClure	Mike Criblez	Mark Beckwith	Gary Faistad	Mike Kostensky	Sue Fields	Dan Tronge	Ken Boczar	Martha L. Demshar	William W. Seiling	Fred Hanley	Howard Bradley	Joseph (Joe) Gleydura	Jack Groselle	Terry Kulka	Tom Bosma	Sue Ruley	Ellis Erb	Galen Stoll	Melvin K. Winegardener	Brian Overholf	Rodney Watkins	William Wilson	Tom Matola	.t.1 ppd	robeit (bod) schlick	Albert Krabs	James (Jim) Haun	Paul Basinger	H. Don. Leis	Ron Dan. Bible	Earl Kerr	Jeff Prebish	Lenny Broome	James Deffenbaugh	Barbara McKenzie	Henry Michael	Joseph Youngpeter	Joe Burgei	Jerry Gilden	David Pettigrew	Michael (Mike) Rach
Trustee		Tractor	Truettae	Totales	Triotop	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Totaled	Trucks	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee
4422 Maplegrove Ave.	4422 Maplegrove Ave.	AADO Maniegrave Ave	2530 Fort Amenda Road	2880 Ada Road	2980 Arts Road	3765 West Market Street	3765 West Market Street	3765 West Market Street	225 E. Sugar Street	225 E. Sugar Street	225 E. Sugar Street	218 Gougler	218 Gougler	1333 Tallmadge Rd	1333 Tailmadge Rd.	1333 Tallmadge Rd.	27 E. Jefferson Street	27 €. Jefferson Street	2530 Fort Amanda Road	2600 Elmwood Extension	2600 Elmwood Extension	2600 Elmwood Extension	11616 Garfield Rd	11616 Carfield Rd	11616 Garfield Rd	12360 Market Avenue North	12360 Market Avenue North	12360 Market Avenue North	7726 Bellefontaine Road	4130 W. Lincoln Highway	Sugar Creek Township Administration	Nelson Community House	Nelson Community House	Freedom Township Road	Creedom Tougetin Dood	3364 Youngstown-Kingsville Road	3364 Youngstown-Kingsville Road	102 Pioneer Road	102 Pigneer Road	102 Pioneer Road	14228 Galehouse Rd.	14228 Galehouse Rd.	14228 Galehouse Rd.	2966 SR 255	2956 SR 255	2956 SR 255	5405 Kiggins Road	5405 Kiggins Road	5405 Kiggins Road	10018 Mottown Road	1242 State Roule 14
PO Box 181 Louisville		PO Box 181 Originale	lima		lima	Leavittsburg	Leavittsburg	Leavittsburg	Lafayette	Lafayette	Lafayette	Kent	Kent	Kent	Kent	Kent	Jefferson	Jefferson	ima	Hubbard Twp	Hubbard Twp	Hubbard Twp.	Hiram	Hiram	Hiram	Hartville	Hartville	Hartville	Harrod	Gomer	con His		PO Box 377 Garrettsville	Freedom	Franciom	1 7 Q 2 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4	FOWIER	1455 N. Cole Street Elida	102 Roger St. (hom Elida	1707 Bittersweet Dr Elida	Doylestown	Doylestown	Doylestown	Diamond	Diamond	Diamond	Delphos	Delphos	Delphos	Deerfield	Deerfield
Ohio		U			2	OKO		rg Ohio	오			0	_	_	_	_				Onio	Ohio	Onto				0	_	Ohio			오	皇	皇								Ohio	Ohio	Ohio							0	-
44641	4	44841	45805	4580	45 801	44430	44430	44430	45854	45854	45854	44240	44240	44240	4240	44240	44047	44047	45805	44425	44425	4425	44234	44234	44234	44632	44632	44632	45850	45807	45809	44231	44231	44288	44298	44418	44418	45607	45807	45807	44230	44230	44230	4412	44412	4412	46833	45833	45833	44411	44411

Spencer Township	Spencer Township	Spencer Township	Sagamore Hills Township	Sagamore Hills Township	Rootstown Township	Edinburg Township	Edinburg Township	Richfield Township	Richfield Township	Rootstown Township	Rootstown Township	Ravenna Township	Ravenna Township	Parts Township	Paris Township	Paris Township	Edinburg Township	Charlestown Township	Charlestown Township	Randolph Township	Randolph Township	Randoiph Township	Perry Twp, Lake County	Boston Township	Boston Township	Boston Township	Painesville Twp	Leroy Township	Leray Township	Northfield Center Township	Northfield Center Township	Northfield Center Township	North Jackson Township	North Jackson Township	North Jackson Township	Plain Township	Plain Township	Newbury Township	Springfield Township	Springfield Township	Bethlehem Township	Bethlehem Township	Bethiehem Township	Perry Township	Perry Township	Jackson Township	Jackson Township	Shalersville Township	Shalersville Township	Mantua Township	Mantua Township	Madison Township
Allen McMichael	Geraid D. Keller	Ron E. Lefflel	Richard Barrett	Rose Mary Snell	Diane Dillon	Sandra Templeton	Thomas Repcik	Shano Cica-Mraz	David Wyatt	David Armentrout	Bonnie M. Howe	Pat Artz	Melvin E. Cole	Thomas (Tom) Smith	Dan Spicer	Raiph Graham	Diane Hargett Austin	Edward Boles	Tim Patrick	Michael T. Lang	George W. Klag	Gary Homing	James Secor	Amy Anderson	Randolph Bergdorf	John Puchalsky	Angelo Cicconetti	Richard Van Pett	Chuck Kico	Mary Catalano	Richard Reville	Marc Pepera	Charles (Chuck) Booth	Steve Gondol	John Jakubec	Pam Bossart	Louis (Lou) Giavasis	Glen Quigley	Robert Orr	Rick Jones	Dean Goodman	Ronald Wendling	David Regula	James (Jim) Holmes	Anna Capaldi	William Burger	John Pizzino	Lawrence Solak	Frank R. Ruehr	Connie Leedom	Victor W. Grimm	Mary Lou McCracken
Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustae	Trustæe	Trustee	Trustae	Trustee	Trustee-Chairman	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee
13080 Kolter Road	13080 Kelter Road	13080 Kolter Road	11551 Valley View Road	11551 Valley View Road	3988 SR 44	6703 Tallmadge Road	5856 Tallmadge Rd.	4410 West Streetsboro Road	4410 West Streetsboro Road	4819 Smith Ave.	3149 Queen Road	6638 Peck Road	6473 Marchinn Road	5975 McClintockburg Road	6180 St. Rt. 225	5974 State Route 225	4396 S.R. #14	6375 Rock Spring Rd.	6375 Rock Spring Rd.	1492 State Route 44	5054 Waterloo Road	1639 SR 44	3750 Center Rd	P.O. Box 123	P.O. Box 123	P.O. Box 123	55 Nye Rd.	5920 Paine Road	5920 Paine Road	9546 Brandywine Rd.	9546 Brandywine Rd	9546 Brandywine Rd.	P.O. Box 400	P.O. Box 400	P.O. Box 400	2600 Easton N.W.	2600 Easton N.W.	14899 Auburn Road	3475 E. South Range Road	3475 E. South Range Road	8600 Blough Ave. SW	8600 Blough Ave. SW	8600 Blough Ave. SW	3111 Hilton N.W.	3111 Hilton NW	5735 Wales Road N.W.	5735 Wales Road N.W.	9090 SR 44	9692 Infirmary Rd.	12517 S.R. 44	4574 Harner Rd.	2065 Hubbard Road
								P.O. Box 191	P.O. Box 191														P.O. Box 65	7680 Riverview Ro: Peninsula														P. O. Bax 257														
Spencerville	Spencerville	Spencerville	Sagamore Hills	Sagamore Hills	Rootstown	Rootstown	Rootstown	Richfield	Richfield	Ravenna	Ravenna	Ravenna	Ravenna	Ravenna	Ravenna	Ravenna	Ravenna	Ravenna	Ravenna	Randolph	Randolph	Randolph	Perry Twp.	o: Peninsula	Peninsula	Peninsula	Painesville	Painesville	Painesville	Northfield Center	Northfield Center	Northfield Center	North Jackson	North Jackson	North Jackson	North Canton	North Canton	Newbury	Springfield Township	Springfield Township	Navarre	Navarre	Navarre	Massillon	Massillon	Massillon	Massillon	Mantua	Mantua	Mantua	Mantua	Madison
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45887	45887	45887	44087	44087	44272	44272	44286	44286-0191	44286-0191	44266	44266	44266	44266	44266	44266	44266	44266	44266	44266	44265	44201	44265	44081	44264	44264	44264	44077	44077	44077	44067	44067	44067	44451	44451	44451	44721	44721	44065	44443	44443	44662	44662	44662	44646	44646	44846	44646	44255	44255	44255	44256	44057

Boardman	Ashtabula Township	Vienna Township	Madison Township	Twinsburg Township	Perry Twp, Ashtabula County	Saybrook Township	Jackson Township	Copley Township	Ashtebula Township	Austintown Township	Jackson Township	Charlestown Township	Perry Twp, Lake County	Palnesville Twp.	Painesville Twp.	Leray Township	Ptain Township	Perry Township	Shalersville Township	Madison Township	Jefferson Township	Freedom Township	Concord Township	Auburn Township	Atwater Township	Saybrook Township	Springfield Township	Twinsburg Township	Sagamore Hills Township	Richfleld Township	Springfield Township	Canfield Township	Liberty Township	Liberty Township	Liberty Township	Windham Township	Windham Township	Windham Township	Howland Township	Howland Township	Howland Township	Champion Township	Champion Township	Champion Township	Barlow	Barlow	Vienna Township	Vienna Township	Twinsburg Township	Suffield Township	Suffield Township	Suffield Township
John C. Cox	Sam C. Bucci	Mark Finamore	Peter Wayman	Thomas Schmidt	Thomas C. Haas	Greg Staida	Steven Meeks	Helen Humphrys	Mary Ann Smith	David C. (Dave) Ditzler	Randy Gonzalez	James Eskridge	Philip Haskell	Jeanette Cristip	James Falvey	Linda Burhenne	Al Leno	Craig Chessler	John Bujak	William Brotzman	Timothy J. Skidmore	Bill McDowell	Michael P. (Mike) Lynch	P.J. Cavanagh	James Conley	Robert J. (Bob) Brobst	R. Bruce Killian	William LeFalver	Paul Schweikert	Laurie Peters-Gilmore	Gerald Guterba	Paul F. Moracco	Patricia (Patty) Metzinger	Jodi Stovak	Jack Simon	Brian Miller	Dann Timmons	Howard Furi	Sally Wehmer	Richard Orwig	Rick Clark	Jeff Hovanic	Keith Bowser	Tim Downs	John Hannan	Darren Roddy	Glen Wireman	Jeffrey Draves	Gregory Glover	David Polen	Ronald (Ron) Mishler	David Vartenuk
Trustee, Chairman	Trustee Vice-President	Trustee Vice-Chairman	Trustee Vice-Chairman	Trustee Vice Chairman	Trustee Vice Chairman	Trustee Vice Chairman	Trustee President	Trustee President	Trustee President	Trustee Ditzler	Trustee Clerk	Trustee Chairman	Trustee Chairman	Trustee Chairman	Trustee Chairman	Trustee Chairman	Trustee Chairman	Trustee Chairman	Trustee Chairman	Trustee Chairman	Trustee Chairman	Trustee Chairman	Trustee Chairman	Trustee Chairman	Trustee Chairman	Trustee Chairman	Trustee Chairman	Trustee Chair	Trustee Chair	Trustee Chair	Trustee	Trustee - Chairman	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee	Trustee
8299 Market Street	2718 North Ridge East	848 Youngstown-Kingsville Road	2065 Hubbard Road	9833 Ravenna Rd.	3750 Center Rd.	7247 Center Road	5735 Wales Road N.W.	1540 S. Clevetand-Massillon Rd.	2718 North Ridge East	82 Ohltown Road	5735 Wales Road N.W.	6375 Rock Spring Rd.	3750 Center Rd.	55 Nye Rd.	55 Nye Rd.	5920 Paine Road	2600 Easton N.W.	3111 Hilton N.W.	9692 Infirmary Rd.	2065 Hubbard Road	27 E. Jefferson Street	Freedom Township Road	7229 Ravenna Road	11010 E. Washington Street	1219 State Route 183	7247 Center Road	2459 Canfield Road	9833 Ravenna Rd.	11551 Valley View Road	4410 West Streetsboro Road	3475 E. South Range Road	21 South Broad Street	1315 Churchill-Hubbard Road	1315 Churchill-Hubbard Road	1315 Churchill-Hubbard Road	9011 N. Main St.	9011 N. Main St.	9011 N. Main St.	169 Niles-Contend Road	169 Niles-Cortland Road	169 Niles-Cortland Road	149 Cernter Street	149 Center Street	149 Center Street	2424 Layman Rd.	9457 SR 339	648 Youngstown-Kingsville Road	848 Youngstown-Kingsville Road	9833 Ravenna Rd.	2328 Steffy Road	1268 Congress Lake Road	679 Congress Lake Road
													P.O. Box 65														2734 Hayne Road			P.O. Box 191																						
Boardman	Ashtabula	Vienna	Madison	Twinsburg	Perry Twp.	Ashtabula	Maggillon	Copley	Ashtabula	Austintown	Massillon	Ravenna	Perry Twp.	Painesville	Painesville	Painesville	North Canton	Massillon	Mantua	Madison	Jefferson	Freedom	Concord Twp.	Aubum Township	Atwater	Ashtabula	Akron	Twinsburg	Sagamore Hills	Richfield	Springfield Township	Canfield	Youngstown	Youngstown	Youngstown	Windham	Windham	Windham	Warren	Warren	Warren	Warren	Warren	Warren	Vincent	Vincent	Vienna	Vienna	Twinsburg	Suffield	Suffield	Suffletd
Ohio	오	Qhio	오	오	Qhio	오	오	Ohio	오	Ohio	Ohio	오	일	오	Ohio	오	Ohio	Ohio	OHO OHO	오	오	오	오	OHO	Q _{ii} o	오	<u>Chio</u>	오	오			ONio	Q S	아 이	<u>유</u>	오	皇	오	암	암	유	Qhio	오	Ohio	오	오	양	Ohio	皇	Ohio	OH O	Ohio
44512	44004	44473	44057	44087	44081	44004	44546	44321-1998	44004	44515	44646	44266	44081	44077	44077	44077	44721	44646	44255	44057	44047	44 288	44077	44023	44201	44004	44312	44087	44087	44286-0191	44443	444 06	44505	44505	44506	44288	44288	44288	44484	44484	44484	44481	44481	44481	45712	45712	44473	44473	44087	44260	44260	44260

Wood County	Wood County	Wood County	Mentor	SugarCreek - Allen Co.	Glenwillow	Bedford	Shaker Heights	Cleveland Heights	Gomer	Cleveland Heights	Canfield Township	Coventry Township	Ravenna Township	Mentua Township	Franklin Township
Tim W. Brown	Alvin L. Perkins	James S. Carter	Ray Kirchner	William Williams	John Baca	Marilyn Zolata	Jan M. Devereaux	Kenneth Montack	Brian Overholt	Dennis Zentarski	William R. (Bill) Weaver	Val Sawhill	Robert A. Cherry	Steven (Steve) Oros	Ke就h Benjamin
Wood County Commissioner	Wood County Commissioner	Wood County Commissioner	Vice-Mayor/Vice-President	Vice-chairman-Trustee	Vice Mayor, Ward 2	Vice Mayor / Councilman	Vice Mayor	Vice Mayor	Vice Chair - Trustees	Utilities Commissioner	Trustee-Chairman	Trustee-Chairman	Trustee/Chairman	Trustee/Chairman	Trustee/Chairman
1 Courthouse Square	1 Courthouse Square	1 Courthouse Square	8500 Civic Center	4130 W. Lincoln Highway	29556 Petiibone Road	65 Columbus Road	3400 Lee Road	40 Severance Circle	Sugar Creek Township Administration	40 Severance Circle	21 South Broad Street	68 Portage Lakes Drive	6552 Peck Road	4522 Wayne Road	218 Gougler
Bowling Green	Bowling Green	Bowling Green	Mentor	Gomer	Glenwillow	Bedford	Shaker Heights	Cleveland Heights	4130 W. Lincoln Hit Gomer	Cleveland Heights	Canfield	Akron	Ravenna	Mantua	Kent
오	오	오	OHIO	오	양	Ohio	양	애	皇	Ohio	Ohio	Ohio	Ohio	Ohio	Ohio
43402	43402	43402	44060	45807	44139	44148	44120	44118	45809	44118	44406	44319	44266	44255	44 240