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August 19, 2010

VIA HAND DELIVERY

Public Utilities Commission of Ohio
Docketing Division
180 E. Broad Street
13th Floor
Columbus, Ohio 43215

PUCO

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Re: *In the matter of the Application of Volunteer
Energy Services, Inc. for Renewal of Certification
as a Competitive Retail Natural Gas Supplier
Case No. 02-1786-GA-CRS*

Dear Sir or Madam:

Enclosed please find an original and (11) eleven copies of the Motion to Supplement Filing with Exhibits D-1, D-2 and D-3 to be filed. Please return a time-stamped copy to us.

If you have any questions, please don't hesitate to contact me.

Very truly yours,

CARLILE PATCHEN & MURPHY LLP


John L. Einstein, IV

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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the matter of the Application of)	
Volunteer Energy Services, Inc. for)	
Renewal of Certification as a Competitive)	Case No. 02-1786-GA-CRS
Retail Natural Gas Supplier.)	

MOTION TO SUPPLEMENT FILING

Volunteer Energy Services, Inc. ("VESI") respectfully requests that the Public Utilities Commission of Ohio ("PUCO" or "Commission") grant its Motion to Supplement Filing to file its application for renewal of certification as a competitive retail gas supplier previously filed July 28, 2010. VESI seeks to supplement the filing with Exhibits D-1, D-2, and D-3. The undersigned had erroneously submitted the renewal application which omitted the Exhibits. A copy of Exhibits is attached hereto.

Respectfully submitted,

CARLILE PATCHEN & MURPHY LLP


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ATTORNEY FOR VOLUNTEER
ENERGY SERVICES, INC.

EXHIBIT D-1 "OPERATIONS"

VOLUNTEER ENERGY SERVICES, INC.

A. General Requirements

Volunteer Energy Services, Inc. (VESI) will purchase natural gas and will supply and deliver natural gas to customers that sign a natural gas sales agreement with VESI. VESI will purchase and sell natural gas to customers under the existing rules and tariff requirements of Columbia Gas of Ohio ("COH"), Dominion East Ohio Gas ("DEO"), Duke Energy Ohio ("Duke"), and Vectren Energy Delivery of Ohio ("VEDO") according to the rules and regulations of the Public Utilities Commission of Ohio ("PUCO").

Volunteer Energy Services, Inc. currently delivers wholesale supplies of natural gas to customers behind the gas companies, COH, Duke, DEO, and VEDO.

B. Point of Delivery

The Point Delivery for natural gas for purposes of passing title and determining a Proposal price shall be the inlet side of the city gate meter for the various gas companies. VESI shall have full responsibility for arranging transportation to the city gate on a daily basis within the balancing and banking tolerances permitted by each gas company. All expenses, fees, fines or costs associated with imbalances on both the transmission system and the local gas company shall be paid by VESI.

C. Natural Gas Quality Specifications

Natural gas tendered to the various gas companies city gate shall meet the pipeline quality standards established by each interstate transmission company and each local gas company. VESI shall take full responsibility for meeting the quality standards for both the interstate pipeline(s) and the local gas companies. To the degree that any gas tendered by VESI fails to meet thermal values, or falls below the established quality standards for moisture, sulfur or contaminants, the full cost for such failure to comply with pipeline/distribution quality standards shall be paid by VESI.

D. Supply and Distribution Plan

Volunteer Energy Services, Inc. currently delivers to its COH and DEO markets using various supply sources. This includes Gulf Coast supply delivered into Columbia Gulf Transmission and Dominion Transmission, Appalachian Production and Supply Pool volumes. VESI also uses supply originations from ANR Pipeline, Texas Gas Transmission, Tennessee Gas

Pipeline and Texas Eastern Transmission for market areas on COH's system, which may be better served through these interstate pipelines.

VESI currently owns Firm Transportation capacity and transports on Columbia Gas Transmission (TCO) using Firm Transportation Service (FTS) agreements and Storage Service Transportation (SST) agreements. Volunteer Energy Services, Inc. also has contracts for Firm Storage Service (FSS) on TCO.

EXHIBIT D-2 "OPERATIONS EXPERTISE"

VOLUNTEER ENERGY SERVICES, INC.

Since it has been in business, VESI has been engaged in all the activities described below. These activities shall continue in the future as VESI offer retail natural gas service.

Gas Supply Management Program

VESI's Gas Supply Management Program is custom tailored to the end-users needs, with service levels, pricing, and fee structure negotiated to meet each customer's specific requirements. In order to meet the goal and objectives as stated, VESI recommends establishing the natural gas energy management services for our customers as outlined below:

Gas Supply and Storage

VESI will evaluate interruptible, firm transportation options and storage arrangements on the LDC and upstream pipelines for each customer facility receiving gas supply from VESI.

VESI's natural gas supply strategy is focused on purchases of firm supplies under spot and long term arrangements directly from Ohio production areas, producers, supplemented with economical Gulf Coast production from various production areas and interstate pipelines. VESI currently owns and transports on Dominion Transmission and Columbia Gas Transmission (TCO) using Firm Transportation (FTS) agreements and Storage Service Transportation (SST) agreements. VESI also has contracts for Firm Storage Service (FSS) on TCO.

Firm Transportation/Capacity Release

VESI will continue to assess the availability of short term and long-term release of firm capacity rights on the interstate pipelines upstream of customer's facilities for our customers. In addition to monitoring of all relevant EBB's, VESI has established trading relationships with other marketers, LDC's and pipelines which have yielded discounted firm transportation via capacity release programs.

Requirement Estimates

VESI will prepare gas requirement forecasts and submit all necessary LDC and pipeline nominations. VESI will develop forecasting procedures that will provide adequate usage estimates and updates necessary to meet actual demand for VESI customers and to comply with pipeline and LDC balancing requirements as required.

Scheduling

VESI will do all necessary pipeline and LDC scheduling, dispatching and nominating required to deliver natural gas and to ensure that VESI customers have full advantage of any upstream pipeline discounts. VESI will schedule and monitor daily, all flowing gas on

upstream pipelines. VESI shall have full responsibility for arranging transportation to the city gate on a daily basis within the balancing and banking tolerances permitted by the various gas companies. All expenses, fees, fines, or costs associated with imbalances on both the interstate transmission system and the local gas companies shall be paid by VESI.

Customized Customer Reports

In conjunction with the performance review meetings with customers, various reports will be prepared for customers use. These reports can include: cost savings as compared to published Index and/or LDC's rates, consumption history, price projections for budgeting, etc.

Invoicing

VESI will provide a monthly invoice to each customer in a timely fashion, with a usage breakdown by account. Detailed information will be supplied regarding natural gas supplied and the appropriate cost of those supplies as per the natural gas sales agreement with each customer. VESI will reconcile volumetric consumption and transportation charges with the applicable utility delivery statements. VESI will provide savings analysis on a monthly basis to each GTS customer.

Customer Complaints

VESI provides a toll free number for customers inquiries. VESI will respond to customer inquiries and complaint in accordance with Commission rules adopted pursuant to Section 4929.22 of the Revised Code and contained in Chapter 4901:1-29 of the Ohio Administrative Code.

Pricing

VESI will present various pricing options for potential VESI customers. Practical consideration (such as base load expectations, peak day usage, availability of spot gas, and transportation alternatives) and commercial factors (alternative fuels, winter price spikes, tariff costs, long term gas market trends, etc.) will impact the pricing selection.

Price options VESI can provide now or in the future for customers are:

1. Fixed price for an established term
2. Fixed price with periodic adjustments tied to market tracking mechanism
3. "Cost Plus" methodology
4. NYMEX related pricing
5. Indexed pricing
6. Combinations of the above

The primary objectives of the VESI is to provide reliable, cost effective natural gas supplies and services, to insure that customers receive direct benefits from all transport discounts including capacity release utilization. VESI to become a supply partner and to work with customers to achieve savings, supply security, and competitive portfolio pricing that meets the customer's needs and expectations. VESI desires to be long-term energy partner with each and every customer.

EXHIBIT D-3 "Key Technical Personnel"

Volunteer Energy Services, Inc.

Richard A. Curnutte Sr. - Rick is President of Volunteer Energy Services, Inc. Rick participated in the re-formation of Volunteer Energy Services, Inc. in March of 2001. Rick was named President of the new company and began serving customers in May of 2001. Volunteer Energy Services, Inc.'s main focus is arranging for natural gas supplies and working with Energy Cooperatives and non-profit Buyers Groups.

Rick joined Volunteer Energy Corporation as Vice President, Sales/Marketing in 1995. Rick participated in the formation of Volunteer Energy Services, Inc. with the Williams Companies and was named President in 1996. Volunteer Energy Corporation and Volunteer Energy Services, Inc. was sold to First Energy Solutions in November of 1998.

Before joining Volunteer Energy Services, Inc. Rick was Principal/Vice President, Sales/Marketing for Broad Street Oil & Gas (BSO&G). BSO&G was later sold to Utilicorp/Aquila Energy. He has also held management positions with Unicorp Energy and Yankee Gas Resources/Access Energy/Enron Energy Services.

Prior to entering the natural gas business he was Director of Energy Management for Wendy's International. As Corporate Energy Manager for Wendy's, he was responsible for energy management for 1200 corporate owned Wendy's restaurants throughout the United States. While at Wendy's, Rick transacted the nations first commercial third party natural gas purchase by buying natural gas for 66 Wendy's and Sister's Chicken & Biscuits restaurants on the Columbia Gas of Ohio system.

Before Wendy's Rick was Energy Coordinator for Mid-Ohio Regional Planning Commission (MORPC) of Columbus, Ohio. Rick was responsible for administration of the Department of Energy's/Ohio Department of Development weatherization programs for MORPC/Franklin County Commissioners.

Rick has over 18 years experience in the natural gas industry dealing with the aggregation of residential/commercial and Industrial accounts throughout the United States.

Rick attended Trevecca Nazarene University in Nashville, Tennessee where he earned a B.A. degree in Social Sciences with a minor in economics.

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Jeffrey M. Horsley - Mr. Horsley is General Manager and manages Volunteer Energy Services, Inc.'s supply portfolio. His current responsibilities include assisting markets with procurement of natural gas supplies, interstate transportation agreements and management of the Gas Operations activities. Mr. Horsley was the Director of Energy Supply and Operations for The Energy Cooperative (TEC). Mr. Horsley also served as Director of Gas Operations for Volunteer Energy Corporation (VEC). During his tenure at TEC and VEC, Mr. Horsley was responsible for the administrative setup of the Ohio Schools Council natural gas management services program, which included the tracking of volumes, savings reports, aggregated billing and utility invoice auditing. Mr. Horsley has also held operational management positions with Broad Street Oil and Gas and Enron (Access Energy).

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Tina M. Perkins - Mrs. Perkins is an Operations Analyst, whose current focus is on the account management and nomination needs of the Columbia Gas Distribution Companies, including COH, as well as the Columbia Gas Transmission and Columbia Gulf Transmission interstate markets. Mrs. Perkins had held operational positions with The Energy Cooperative (TEC), Volunteer Energy Corporation (VEC) and Broad Street Oil and Gas (Utilicorp/Energy One.) During her tenure at TEC and VEC, Mrs. Perkins was responsible for the account management, nominations and billing for the Ohio School Council natural gas management service program.

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Brenda G. Hammons - Mrs. Hammons is an Operations Analyst. Her current focus is on the account management and nomination needs of the Dominion Distribution Companies, including the Dominion East Ohio and Dominion West Ohio gas companies, as well as the Dominion interstate pipeline market areas. Mrs. Hammons has held operational positions with The Energy Cooperative (TEC), Volunteer Energy Corporation (VEC) and NGO Development. During her tenure at TEC and VEC, Mrs. Hammons was involved in the management of over 70 school districts for the Ohio School Council natural gas management service program.

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