

NC
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10-138-6A-CRS 30

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2010 FEB -5 AM 10: 58

PALMco

Electricity Sales - Natural Gas Sales
1350 60th Street, Brooklyn, New York 11219
Phone (718) 851-6655 - Fax (718) 851-2427
Family Owned - Affiliate Established 1938
www.PalmcoEnergy.com

PUCO

February 3, 2010

Public Utilities Commission of Ohio
Docketing Division, 11th Fl
180 East Broad Street
Columbus, Ohio 43215-3793

*Re: Palmco Energy OH, LLC - Natural Gas Supplier
Certification Application and Motion for Protective Order*

Dear Sir or Madam:

Enclosed for filing with the Public Utilities Commission of Ohio is the original notarized application of Palmco Energy OH, LLC ("Palmco Energy") for Certification as a Competitive Retail Natural Gas Supplier, signed by a principal officer of Palmco Energy, together with ten (10) copies of the application, including all exhibits, affidavits, and other attachments.

Also enclosed are an original and ten (10) copies of Palmco Energy's Motion for Protective Order and Memorandum in Support filed for certain confidential financial information contained in Exhibit C-4 of Section C-4 of the Application, together with three (3) unredacted sealed copies of the confidential information for which the Protective Order is sought.

Please date-stamp the enclosed postage pre-paid copy of this letter and return it to the undersigned for our records.

Very truly yours,

Palmco Energy OH, LLC

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business By: Robert Palmese
Technician SM Date Processed FEB 05 2010

Robert Palmese
President

STEPHEN MOSER
Notary Public State of New York
No. 01M0607438
Qualified in Richmond County
Commission Expires 07/06/2010

SWORN BEFORE ME THIS 3rd DAY
OF FEBRUARY 2010.

Stephen Moser

NC



FILE

PUCO USE ONLY - Version 1.07		
Date Received	Case Number	Certification Number
	10-137-GA-CRS	

**CERTIFICATION APPLICATION
COMPETITIVE RETAIL NATURAL GAS SUPPLIERS**

Please type or print all required information. Identify all attachments with an exhibit label and title (*Example: Exhibit A-16 - Company History*). All attachments should bear the legal name of the Applicant. Applicants should file completed applications and all related correspondence with the Public Utilities Commission of Ohio, Docketing Division, 13th Floor, 180 East Broad Street, Columbus, Ohio 43215-3793.

This PDF form is designed so that you may directly input information onto the form. You may also download the form by saving it to your local disk.

SECTION A - APPLICANT INFORMATION AND SERVICES

A-1 Applicant intends to be certified as: (check all that apply)

- Retail Natural Gas Aggregator Retail Natural Gas Broker Retail Natural Gas Marketer

A-2 Applicant information:

Legal Name Palmco Energy OH, LLC
 Address 1350 60 Street, Brooklyn, NY 11219
 Telephone No. 718 851-6655 Web site Address www.PalmcoEnergy.com

A-3 Applicant information under which applicant will do business in Ohio:

Name Palmco Energy OH, LLC
 Address 1350 60 Street, Brooklyn, NY 11219
 Web site Address www.PalmcoEnergy.com Telephone No. 718 851-6655

A-4 List all names under which the applicant does business in North America:

Palmco Energy OH, LLC

A-5 Contact person for regulatory or emergency matters:

Name Robert Palmese Title Member
 Business Address 1350 60 Street, Brooklyn, NY 11219
 Telephone No. 718 851-6655 Fax No. 718 851-2427 Email Address RVPalmese@PalmcoEnergy.com

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A-6 Contact person for Commission Staff use in investigating customer complaints:

Name Customer Service Title Supervisor
Business address 1350 60 Street, Brooklyn, NY 11219
Telephone No. 718 851-6655 Fax No. 718 851-2427 Email Address CustomerService@PalmcoEng

A-7 Applicant's address and toll-free number for customer service and complaints

Customer service address 1350 60 Street
Toll-Free Telephone No. 877 726-5862 Fax No. 718 851-2427 Email Address CustomerService@PalmcoE

A-8 Provide "Proof of an Ohio Office and Employee," in accordance with Section 4929.22 of the Ohio Revised Code, by listing name, Ohio office address, telephone number, and Web site address of the designated Ohio Employee

Name Jeanne Vargo Title Staff
Business address 4807 Rockside Road, Suite 400, Independence, Ohio 44131
Telephone No. 216 642-8244 Fax No. 718 851-2427 Email Address CustomerService@PalmcoEnergy.co

A-9 Applicant's federal employer identification number 32-0274223

A-10 Applicant's form of ownership: (Check one)

- Sole Proprietorship Partnership
 Limited Liability Partnership (LLP) Limited Liability Company (LLC)
 Corporation Other

A-11 (Check all that apply) Identify each natural gas company service area in which the applicant is currently providing service or intends to provide service, including identification of each customer class that the applicant is currently serving or intends to serve, for example: residential, small commercial, and/or large commercial/industrial (mercantile) customers. (A mercantile customer, as defined in Section 4929.01(L)(1) of the Ohio Revised Code, means a customer that consumes, other than for residential use, more than 500,000 cubic feet of natural gas per year at a single location within the state or consumes natural gas, other than for residential use, as part of an undertaking having more than three locations within or outside of this state. In accordance with Section 4929.01(L)(2) of the Ohio Revised Code, "Mercantile customer" excludes a not-for-profit customer that consumes, other than for residential use, more than 500,000 cubic feet of natural gas per year at a single location within this state or consumes natural gas, other than for residential use, as part of an undertaking having more than three locations within or outside this state that has filed the necessary declaration with the Public Utilities Commission.)

<input checked="" type="checkbox"/> Columbia Gas of Ohio	<input checked="" type="checkbox"/> Residential	<input checked="" type="checkbox"/> Small Commercial	<input checked="" type="checkbox"/> Large Commercial / Industrial
<input checked="" type="checkbox"/> Dominion East Ohi	<input checked="" type="checkbox"/> Residential	<input checked="" type="checkbox"/> Small Commercial	<input checked="" type="checkbox"/> Large Commercial / Industrial
<input checked="" type="checkbox"/> Duke Energy Ohi	<input checked="" type="checkbox"/> Residential	<input checked="" type="checkbox"/> Small Commercial	<input checked="" type="checkbox"/> Large Commercial / Industrial
<input checked="" type="checkbox"/> Vectren Energy Delivery of Ohio	<input checked="" type="checkbox"/> Residential	<input checked="" type="checkbox"/> Small Commercial	<input checked="" type="checkbox"/> Large Commercial / Industrial

A-12 If applicant or an affiliated interest previously participated in any of Ohio's Natural Gas Choice Programs, for each service area and customer class, provide approximate start date(s) and/or end date(s) that the applicant began delivering and/or ended services.

Columbia Gas of Ohio

<input type="checkbox"/> Residential	Beginning Date of Service	End Date
<input type="checkbox"/> Small Commercial	Beginning Date of Service	End Date
<input type="checkbox"/> Large Commercial	Beginning Date of Service	End Date
<input type="checkbox"/> Industrial	Beginning Date of Service	End Date

Dominion East Ohio

<input type="checkbox"/> Residential	Beginning Date of Service	End Date
<input type="checkbox"/> Small Commercial	Beginning Date of Service	End Date
<input type="checkbox"/> Large Commercial	Beginning Date of Service	End Date
<input type="checkbox"/> Industrial	Beginning Date of Service	End Date

Duke Energy Ohio

<input type="checkbox"/> Residential	Beginning Date of Service	End Date
<input type="checkbox"/> Small Commercial	Beginning Date of Service	End Date
<input type="checkbox"/> Large Commercial	Beginning Date of Service	End Date
<input type="checkbox"/> Industrial	Beginning Date of Service	End Date

Vectren Energy Delivery of Ohio

<input type="checkbox"/> Residential	Beginning Date of Service	End Date
<input type="checkbox"/> Small Commercial	Beginning Date of Service	End Date
<input type="checkbox"/> Large Commercial	Beginning Date of Service	End Date
<input type="checkbox"/> Industrial	Beginning Date of Service	End Date

A-13 If not currently participating in any of Ohio's four Natural Gas Choice Programs, provide the approximate start date that the applicant proposes to begin delivering services:

<input checked="" type="checkbox"/>	Columbia Gas of Ohio	Intended Start Date	6/1/2010
<input checked="" type="checkbox"/>	Dominion East Ohio	Intended Start Date	6/1/2010
<input checked="" type="checkbox"/>	Duke Energy Ohio	Intended Start Date	6/1/2010
<input checked="" type="checkbox"/>	Vectren Energy Delivery of Ohio	Intended Start Date	6/1/2010

PROVIDE THE FOLLOWING AS SEPARATE ATTACHMENTS AND LABEL AS INDICATED.

- A-14 **Exhibit A-14 "Principal Officers, Directors & Partners,"** provide the names, titles, addresses and telephone numbers of the applicant's principal officers, directors, partners, or other similar officials.
- A-15 **Exhibit A-15 "Corporate Structure,"** provide a description of the applicant's corporate structure, including a graphical depiction of such structure, and a list of all affiliate and subsidiary companies that supply retail or wholesale natural gas or electricity to customers in North America.
- A-16 **Exhibit A-16 "Company History,"** provide a concise description of the applicant's company history and principal business interests.
- A-17 **Exhibit A-17 "Articles of Incorporation and Bylaws,"** if applicable, provide the articles of incorporation filed with the state or jurisdiction in which the applicant is incorporated and any amendments thereto.
- A-18 **Exhibit A-18 "Secretary of State,"** provide evidence that the applicant is currently registered with the Ohio Secretary of the State.

SECTION B - APPLICANT MANAGERIAL CAPABILITY AND EXPERIENCE

PROVIDE THE FOLLOWING AS SEPARATE ATTACHMENTS AND LABEL AS INDICATED

- B-1 **Exhibit B-1 "Jurisdictions of Operation,"** provide a current list of all jurisdictions in which the applicant or any affiliated interest of the applicant is, at the date of filing the application, certified, licensed, registered, or otherwise authorized to provide retail natural gas service, or retail/wholesale electric services.
- B-2 **Exhibit B-2 "Experience & Plans,"** provide a current description of the applicant's experience and plan for contracting with customers, providing contracted services, providing billing statements, and responding to customer inquiries and complaints 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.
- B-3 **Exhibit B-3 "Summary of Experience,"** provide a concise and current summary of the applicant's experience in providing the service(s) for which it is seeking to be certified to provide (e.g., number and types of customers served, utility service areas, volume of gas supplied, etc.).
- B-4 **Exhibit B-4 "Disclosure of Liabilities and Investigations,"** provide a description of all existing, pending or past rulings, judgments, contingent liabilities, revocations of authority, regulatory investigations, or any other matter that could adversely impact the applicant's financial or operational

status or ability to provide the services it is seeking to be certified to provide.

- B-5 Exhibit B-5 "Disclosure of Consumer Protection Violations,"** disclose whether the applicant, affiliate, predecessor of the applicant, or any principal officer of the applicant has been convicted or held liable for fraud or for violation of any consumer protection or antitrust laws within the past five years.

No Yes

If Yes, provide a separate attachment labeled as Exhibit B-5 "Disclosure of Consumer Protection Violations," detailing such violation(s) and providing all relevant documents.

- B-6 Exhibit B-6 "Disclosure of Certification Denial, Curtailment, Suspension, or Revocation,"** disclose whether the applicant or a predecessor of the applicant has had any certification, license, or application to provide retail natural gas or retail/wholesale electric service denied, curtailed, suspended, or revoked, or whether the applicant or predecessor has been terminated from any of Ohio's Natural Gas Choice programs, or been in default for failure to deliver natural gas.

No Yes

If Yes, provide a separate attachment, labeled as Exhibit B-6 "Disclosure of Certification Denial, Curtailment, Suspension, or Revocation," detailing such action(s) and providing all relevant documents.

SECTION C - APPLICANT FINANCIAL CAPABILITY AND EXPERIENCE

PROVIDE THE FOLLOWING AS SEPARATE ATTACHMENTS AND LABEL AS INDICATED

- C-1 Exhibit C-1 "Annual Reports,"** provide the two most recent Annual Reports to Shareholders. If applicant does not have annual reports, the applicant should provide similar information, labeled as Exhibit C-1, or indicate that Exhibit C-1 is not applicable and why.
- C-2 Exhibit C-2 "SEC Filings,"** provide the most recent 10-K/8-K Filings with the SEC. If applicant does not have such filings, it may submit those of its parent company. If the applicant does not have such filings, then the applicant may indicate in Exhibit C-2 whether the applicant is not required to file with the SEC and why.
- C-3 Exhibit C-3 "Financial Statements,"** provide copies of the applicant's two most recent years of audited financial statements (balance sheet, income statement, and cash flow statement). If audited financial statements are not available, provide officer-certified financial statements. If the applicant has not been in business long enough to satisfy this requirement, it shall file audited or officer-certified financial statements covering the life of the business.
- C-4 Exhibit C-4 "Financial Arrangements,"** provide copies of the applicant's current financial arrangements to conduct competitive retail natural gas service (CRNGS) as a business activity (e.g., guarantees, bank commitments, contractual arrangements, credit agreements, etc.)
- C-5 Exhibit C-5 "Forecasted Financial Statements,"** provide two years of forecasted financial statements (balance sheet, income statement, and cash flow statement) for the applicant's CRNGS operation, along with a list of assumptions, and the name, address, email address, and telephone number of the preparer.

- C-6 **Exhibit C-6 "Credit Rating,"** provide a statement disclosing the applicant's current credit rating as reported by two of the following organizations: Duff & Phelps, Dun and Bradstreet Information Services, Fitch IBCA, Moody's Investors Service, Standard & Poors, or a similar organization. In instances where an applicant does not have its own credit ratings, it may substitute the credit ratings of a parent or affiliate organization, provided the applicant submits a statement signed by a principal officer of the applicant's parent or affiliate organization that guarantees the obligations of the applicant.
- C-7 **Exhibit C-7 "Credit Report,"** provide a copy of the applicant's current credit report from Experian, Dun and Bradstreet, or a similar organization.
- C-8 **Exhibit C-8 "Bankruptcy Information,"** provide a list and description of any reorganizations, protection from creditors, or any other form of bankruptcy filings made by the applicant, a parent or affiliate organization that guarantees the obligations of the applicant or any officer of the applicant in the current year or since applicant last filed for certification.
- C-9 **Exhibit C-9 "Merger Information,"** provide a statement describing any dissolution or merger or acquisition of the applicant within the five most recent years preceding the application, or at any time as a participant in the Ohio Natural Gas Choice programs.

SECTION D – APPLICANT TECHNICAL CAPABILITY

PROVIDE THE FOLLOWING AS SEPARATE ATTACHMENTS AND LABEL AS INDICATED.

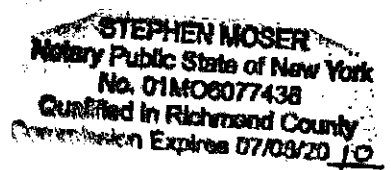
- D-1 **Exhibit D-1 "Operations,"** provide a current written description of the operational nature of the applicant's business. Please include whether the applicant's operations will include the contracting of natural gas purchases for retail sales, the nomination and scheduling of retail natural gas for delivery, and the provision of retail ancillary services, as well as other services used to supply natural gas to the natural gas company city gate for retail customers.
- D-2 **Exhibit D-2 "Operations Expertise,"** given the operational nature of the applicant's business, provide evidence of the applicant's current experience and technical expertise in performing such operations.
- D-3 **Exhibit D-3 "Key Technical Personnel,"** provide the names, titles, email addresses, telephone numbers, and background of key personnel involved in the operational aspects of the applicant's current business.

Applicant Signature and Title *Robert Palmer - Member*

Sworn and subscribed before me this 11 day of January Month 2010 Year

Stephen Moser
Signature of official administering oath

Print Name and Title



My commission expires on



The Public Utilities Commission of Ohio

Competitive Retail Natural Gas Service
Affidavit Form
(Version 1.07)

In the Matter of the Application of)
Palmco Energy OH, LLC)
for a Certificate or Renewal Certificate to Provide)
Competitive Retail Natural Gas Service in Ohio.)

Case No. - -GA-CRS

County of Kings
State of New York

Robert Palmese

[Affiant], being duly sworn/affirmed, hereby states that:

- (1) The information provided within the certification or certification renewal application and supporting information is complete, true, and accurate to the best knowledge of affiant.
- (2) The applicant will timely file an annual report of its intrastate gross receipts and sales of hundred cubic feet of natural gas pursuant to Sections 4905.10(A), 4911.18(A), and 4929.23(B), Ohio Revised Code.
- (3) The applicant will timely pay any assessment made pursuant to Section 4905.10 or Section 4911.18(A), Ohio Revised Code.
- (4) Applicant will comply with all applicable rules and orders adopted by the Public Utilities Commission of Ohio pursuant to Title 49, Ohio Revised Code.
- (5) Applicant will cooperate with the Public Utilities Commission of Ohio and its staff in the investigation of any consumer complaint regarding any service offered or provided by the applicant.
- (6) Applicant will comply with Section 4929.21, Ohio Revised Code, regarding consent to the jurisdiction of the Ohio courts and the service of process.
- (7) Applicant will inform the Public Utilities Commission of Ohio of any material change to the information supplied in the certification or certification renewal application within 30 days of such material change, including any change in contact person for regulatory or emergency purposes or contact person for Staff use in investigating customer complaints.
- (8) Affiant further sayeth naught.

Affiant Signature & Title

Robert Palmese - Member

Sworn and subscribed before me this 11 day of January Month 2010 Year

Stephen Moser

Signature of Official Administering Oath

Print Name and Title

STEPHEN MOSER
Notary Public State of New York
No. 01MO6077438
Qualified in Richmond County
Expires 07/08/2010

My commission expires on

Exhibit A-14 Principal Officers, Directors & Partners

There is only one name to give for Palmco Energy OH. Robert Palmese – Member.
Address - 1350 60 Street, Brooklyn, NY 11219. Phone – 718 851-6655

Exhibit A-15 Corporate Structure

Palmco Energy OH, LLC and each of its affiliates are owned by the same individuals. There is no holding company. Palmco Energy OH, LLC has the following affiliates:

Columbia Utilities, LLC – a licensed gas supplier in New York. No specific license number.
Columbia Utilities Power, LLC – a licensed electric supplier in New York. No specific license number.
Palmco Energy CT, LLC – a licensed gas supplier in Connecticut. License # 09-01
Palmco Power CT, LLC – waiting for license application processing in Connecticut.
Palmco Energy NJ, LLC – a licensed gas supplier in New Jersey. License # GSL-0033
Palmco Power NJ, LLC – a licensed electric supplier in New Jersey. License # ESL-0049
Palmco Energy PA, LLC – a licensed gas supplier in Pennsylvania. License # A-2009-2100320
Palmco Power PA, LLC – a licensed electric supplier in Pennsylvania. License # A-2009-2108338

Exhibit A-16 Company History

There is no company history for Palmco Energy OH, LLC. Palmco is a new company that has not generated any business yet. Once receiving approval from the PUCOH, we can begin to acquire customers and supply natural gas. Palmco is a for profit company. Our interests are to supply a product to a customer and in turn make a profit and keep customers for a long term. Long term customers are the only way to sustain a business.

Exhibit A-17 Articles of Incorporation and Bylaws

Please see the enclosed articles of incorporation from the State of Ohio.

Exhibit A-18 Secretary of State

Please see the enclosed articles of incorporation from the State of Ohio.

Exhibit B-1 Jurisdiction of Operation

There are no jurisdictions in which the Palmco or affiliations of Palmco currently provide retail or wholesale electric services. By the time this application is completely process, it is possible one or more of the affiliates listed above may have their license approved.

Exhibit B-2 Experience & Plans

Chief Officer - Robert Palmese is a graduate of Georgetown University 2002 with a Bachelor of Science in Business Administration. Robert Palmese has overseen the daily operations, including the purchase and scheduling of natural gas, for Columbia Utilities since 2002. Robert acquired the services of Quantum Gas and Power Services (Quantum) in Cypress, TX as agent, for Columbia, who handles the actual contract purchasing and contract nominating / scheduling of natural gas. For Palmco, Robert acquired the services of Quantum as agent for the same services. The above statements for this section B-2 satisfies our experience and providing contracted services.

The following statements will satisfy the remaining items in section B-2. In order to contract with customers we plan on using warm leads from customers who contact us for information. We also intend on using phone and door to door sales as allowable by law. We plan on billing our customers via

consolidated / LDC billing in which our charges appear on the Utility's bill. We have contracted with Energy Services Group (ESG) who will be handling our EDI and billing of customers' accounts.

Palmco has a customer service center set up. Our customer service representatives are knowledgeable in the deregulated markets and have satisfied customers in other states. A customer with a question can contact our office using our toll free number and speak to one of our customer service representatives. All pertinent information to the customers' account(s) is accessible by the Palmco representative. Should the customer not be satisfied, they have the right to ask for a supervisor. If one is available, they will be able to speak to the customer immediately. Should one not be available, the customer will be made aware of this and notified that they will receive a phone call from a supervisor as soon as one is available.

Exhibit B-3 Summary of Experience

Palmco is looking to supply natural gas in the Ohio deregulated market. Palmco's experience comes directly from the Chief Officer's experience at Columbia Utilities. In New York, Columbia serviced a peak of about 13,000 residential customers and about 2,000 commercial customers with a peak load of 5,000,000 therms per month with 8 Utility territories in New York being serviced.

Exhibit B-4 Disclosure of Liabilities and Investigations

There is nothing for Palmco to disclose for there is nothing in a negative nature that has occurred to the company to impact the financial or operational status or ability to provide services.

Exhibit C-1 Annual Reports

There are no annual reports for Palmco because Palmco has not commenced business yet. Once receiving a license from the Ohio Public Utility Commission we can acquire customers and begin generating sales.

Exhibit C-2 SEC Filings

Palmco is not a public company; therefore it does not have any such filings.

Exhibit C-3 Financial Statements

Palmco does not have any financial statements because it has not commenced business yet. Once receiving a license from the Ohio Public Utility Commission we can acquire customers and begin generating sales. However, please see enclosed the financial statements for Columbia Utilities. Columbia Utilities will guaranty the financial ability of Palmco. Please note that the financial statements are confidential. Columbia is a privately owned company and does not wish to have its financials released to the public.

Exhibit C-4 Financial Arrangements

Please see the enclosed letter from our Bank, Citibank about our relationship with them.

Exhibit C-5 Forecasted Financial Statements

Please see the enclosed forecasted financial statements. The name of our accounting firm / preparer is LaGuardia and Petrella, LLC, 12 Gloria Lane, Suite 1, Fairfield, NJ 07004. The phone number is 973 227-5444 and the email address is LaGuardia.Petrella@verizon.net. The name of the partner for our account is John DeLuca.

Exhibit C-6 Credit Rating

Please see the enclosed credit report by Dun and Bradstreet. Palmco is a new company and has not commenced business yet, so there is little to no information about the company. Palmco is a private company and only has a Dun and Bradstreet (DUNS) number, 830077736. It is not applicable to have a rating from any of the other rating companies because it is a private company.

Exhibit C-7 Credit Report

Please see the enclosed credit report by Dun and Bradstreet. Palmco is a new company and has not commenced business yet, so there is little to no information about the company. Palmco is a private company and only has a Dun and Bradstreet (DUNS) number. It is not applicable to have a rating from any of the other rating companies because it is a private company.

Exhibit C-8 Bankruptcy Information

There is no information regarding bankruptcy because the applicant nor any affiliate or parent has ever filed bankruptcy.

Exhibit C-9 Merger Information

There have been no dissolutions or mergers or acquisitions of or by Palmco. Palmco is a new company.

Exhibit D-1 Operations

Palmco is strictly a reseller of natural gas. Palmco will purchase natural gas, do whatever actions necessary to get the natural gas to our customers, i.e. nominate and schedule and resell it to our customers retail.

Palmco does not and will not sell natural gas wholesale. Palmco will not nominate or schedule natural gas for transmission and delivery for other firms or provide any other type of service for non-related firms. To repeat Palmco is in the business of purchasing natural gas and reselling to our customers retail.

Exhibit D-2 Operations Expertise

As stated in Exhibit B-2, our expertise is as follows. Chief Officer - Robert Palmese is a graduate of Georgetown University 2002 with a Bachelor of Science in Business Administration. Robert Palmese has overseen the daily operations, including the purchase and nominating / scheduling of natural gas, for Columbia Utilities since 2002. Robert acquired the services of Quantum Gas and Power Services (Quantum) in Cypress, TX, as agent, for Columbia, who handles the actual contract purchasing and contract nominating / scheduling of natural gas. For Palmco, Robert acquired the services of Quantum, as agent for the same services.

Exhibit D-3 Key Technical Personnel

The key technical personnel for Palmco are as follows:

Daily operations, natural gas procurement, scheduling, Regulatory matters, Customer service – Robert Palmese, Member, RVPalmese@PalmcoEnergy.com. Please see Exhibit D-2 for further information about Robert Palmese's background.

Accounting – we have an accounting department for payables, taxes and any other related issues, phone number 718 851-6655.

Customer Service – we have a customer service department staffed and able to field any questions of customers, CustomerService@PalmcoEnergy.com. Supervisors are also on staff and available to customers.

Support Staff – there is also a general support staff under Robert Palmese in order to handle daily operations and any items / issues while Robert is in the office or while he is away.

Natural Gas Scheduling – Quantum Gas and Power Services, www.QuantumGas.com. Quantum has experience in many deregulated markets and will be handling the scheduling of natural gas for Palmco.

Robert is the only key personnel, but has built a staff to handle all important aspects of the company.

Exhibit A-17

+
Exhibit A-18

200902902670

DATE	DOCUMENT ID	DESCRIPTION	FLING	EXPED	PENALTY	CERT	COPY
01/30/2009	200902902670	ARTICLES OF ORGNZTN/DOM. PROFIT LIM.LIAB. CO. (LCP)	125.00	100.00	.00	.00	.00

Receipt

This is not a bill. Please do not remit payment.

CORPORATION SERVICE COMPANY
ATTN: LISA VAIDO
887 SOUTH HIGH STREET
COLUMBUS, OH 43206

**STATE OF OHIO
CERTIFICATE**

Ohio Secretary of State, Jennifer Brunner

1832534

It is hereby certified that the Secretary of State of Ohio has custody of the business records for

PALMCO ENERGY OH LLC

and, that said business records show the filing and recording of:

Document(s):
ARTICLES OF ORGNZTN/DOM. PROFIT LIM.LIAB. CO.

Document No(s):
200902902670



United States of America
State of Ohio
Office of the Secretary of State

Witness my hand and the seal of the
Secretary of State at Columbus, Ohio
this 28th day of January, A.D. 2009.

Ohio Secretary of State

P1

Exhibit A-17
+
Exhibit A-18



www.sos.state.oh.us
e-mail: busserv@sos.state.oh.us

Prescribed by:
The Ohio Secretary of State
Central Ohio: (614) 466-3910
Toll Free: 1-877-SOS-FILE (1-877-767-3453)

Expedite this Form: (Select One)	
<input checked="" type="radio"/> Expedite	PO Box 1390 Columbus, OH 43216
*** Requires an additional fee of \$100***	
<input type="radio"/> Non Expedite	PO Box 870 Columbus, OH 43216

**ARTICLES OF ORGANIZATION FOR A DOMESTIC
LIMITED LIABILITY COMPANY**

Filing Fee \$125.00

THE UNDERSIGNED DESIRING TO FILE:

(CHECK ONLY ONE (1) BOX)

<input checked="" type="checkbox"/> (1) Articles of Organization for Domestic For-Profit Limited Liability Company (115-LCA) ORC 1705	<input type="checkbox"/> (2) Articles of Organization for Domestic Nonprofit Limited Liability Company (115-LCA) ORC 1705
---	---

Name of limited liability company: PALMCO ENERGY OH LLC

Name must include one of the following words or abbreviations: "limited liability company," "limited," "LLC," "L.L.C.," "Ltd.," or "Ltd"

Effective Date (Optional) _____ (The legal existence of the limited liability company begins upon the filing of the articles or on a later date specified that is not more than ninety days after filing)
mm/dd/yyyy

This limited liability company shall exist for (Optional) _____ Period of Existence
PERPETUAL

Purpose (Optional)

Check here if additional provisions are attached

CLIENT SERVICE CENTER
 2009 JAN 28 PM 4:53
 SECRETARY OF STATE

P2

Exhibit A-17

+
Exhibit A-18

ORIGINAL APPOINTMENT OF AGENT

The undersigned authorized member(s), manager(s) or representative(s) of

PALMCO ENERGY OH LLC

Name of Limited Liability Company

hereby appoint the following to be Statutory Agent upon whom any process, notice or demand required or permitted by statute to be served upon the limited liability company may be served. The name and address of the agent is

CSC-Lawyers Incorporating Service (Corporation Service Company)

Name of Agent

50 West Broad Street, Suite 1800

Mailing Address

Columbus

City

Ohio

State

43215

Zip Code

If the agent is an individual and using a P.O. Box, check this box to certify the agent is a resident of the state of Ohio.

ACCEPTANCE OF APPOINTMENT

The undersigned, named herein as the statutory agent for

PALMCO ENERGY OH LLC

Name of Limited Liability Company

hereby acknowledges and accepts the appointment of agent for said limited liability company

CSC-Lawyers Incorporating Service (Corporation Service Company)

Sonya L. Cordell

Assistant VP

By: Sonya L. Cordell

Agent's Signature

P3

Exhibit A-17
+
Exhibit A-18

REQUIRED
Articles and original
appointment of agent
must be (signed) by a
member, manager or
other representative.

Robert Palmese
Signature

JANUARY 26, 2009
Date

ROBERT PALMESE, MEMBER
Print Name

Signature

Date

Print Name

Signature

Date

Print Name

P4



Citibank, N.A.
One Court Square, 14th Floor
Long Island City, NY 11120

January 7, 2010

Public Utility Commission of Ohio
180 East Broad St.
Columbus, OH 43215

To whom it may concern,

Attached is requested information as follows:

1. History
 - a. Palmco Energy OH, LLC and Palmco Power OH, LLC and its related entities have been doing business with Citibank since 1940. All dealings with the company have been satisfactory to date with no derogatory history.
2. Balances
 - a. Present checking and savings account balances exceed low 8 figures.
 - b. Outstanding loan balances exceed mid 7 figures and are handled in a satisfactory manner.
3. Lines of credit
 - a. Existing lines of credit amount to \$10 million.

If you require any additional information, please do not hesitate to contact me. I can be reached at 718-248-6906 or kevin.r.mchale@citi.com.

Sincerely,

Kevin McHale, VP
Banker

P1

Exhibit C-5

Pro Forma
INCOME STATEMENT - PALMCO ENERGY OH, LLC
Year End 2010

	January 1 to December 31 <u>2010</u>
REVENUES:	
Sales - Natural Gas	\$ 145,000
Sales - Unbilled Natural Gas	<u>(10,000)</u>
Total Revenues from Sales	135,000
COST OF SALES:	
Purchases - Natural Gas	<u>75,000</u>
Total Cost of Sales	<u>75,000</u>
Gross Profit on Sales	<u>60,000</u>
LESS OTHER EXPENSES:	
Selling Expenses	2,000
General & Administrative Expense	1,000
Total Other Expenses	<u>3,000</u>
Net Income for Period Transferred to Members' Equity	<u>\$ 57,000</u>

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Exhibit C-5

Pro Forma
BALANCE SHEET - PALMCO ENERGY OH, LLC
Year End 2010

January 1 to
December 31
2010

ASSETS

CURRENT ASSETS:

Cash and Cash Equivalents	\$ 30,000
Accounts Receivable	40,000
Accounts Receivable - Unbilled	5,000
Total Current Assets	75,000

OTHER:

Security Deposits	<u>10,000</u>
Total Assets	<u>\$ 85,000</u>

LIABILITIES

CURRENT LIABILITIES:

Accounts Payable	\$ 10,000
Accrued Expenses	8,000
Total Current Liabilities	<u>18,000</u>

MEMBERS' EQUITY

Balance January 1, 20010	10,000
Add: Net Income for Period January 1 to December 31, 2010	57,000
Total Members' Equity December 31, 2010	<u>67,000</u>
Total Liabilities and Members' Equity	<u>\$ 85,000</u>

02

Exhibit C-5

Pro Forma
CASHFLOW STATEMENT - PALMCO ENERGY OH, LLC
Year End 2010

January 1 to
December 31
2010

CASH FLOWS FROM OPERATING ACTIVITIES:

Cash Received from Customers \$ 145,000
Cash Paid to Suppliers & Employees (85,000)

Net Cash Provided by (Used In) Operating Activities 60,000

Total Increase in Cash Equivalents 60,000
Cash Equivalents Beginning of Period 30,000

Cash & Cash Equivalents End of Period \$ 90,000

**Net Provided by (Cash Used) In Operating Activities
as Above** \$ 90,000

Exhibit C-5

Pro Forma
INCOME STATEMENT - PALMCO ENERGY OH, LLC
Year End 2011

	January 1 to December 31 <u>2011</u>
REVENUES:	
Sales - Natural Gas	\$ 152,250
Sales - Unbilled Natural Gas	<u>(10,500)</u>
Total Revenues from Sales	141,750
COST OF SALES:	
Purchases - Natural Gas	<u>78,750</u>
Total Cost of Sales	<u>78,750</u>
Gross Profit on Sales	<u>63,000</u>
LESS OTHER EXPENSES:	
Selling Expenses	2,100
General & Administrative Expense	1,000
Total Other Expenses	<u>3,100</u>
Net Income for Period Transferred to Members' Equity	<u>\$ 59,900</u>

For the Year 2011, we are assuming a growth of
5% to be conservative

P4

Pro Forma
 BALANCE SHEET - PALMCO ENERGY OH, LLC
 Year End 2011

January 1 to
 December 31
2011

ASSETS

CURRENT ASSETS:

Cash and Cash Equivalents	\$ 31,500
Accounts Receivable	42,000
Accounts Receivable - Unbilled	5,250
Total Current Assets	78,750

OTHER:

Security Deposits	10,000
Total Assets	\$ 88,750

LIABILITIES

CURRENT LIABILITIES:

Accounts Payable	\$ 10,500
Accrued Expenses	8,000
Total Current Liabilities	18,500

MEMBERS' EQUITY

Balance January 1, 2011	67,000
Add: Net Income for Period January 1 to December 31, 2011	59,900
Total Members' Equity December 31, 2010	126,900
Total Liabilities and Members' Equity	\$ 145,400

For the Year 2011, we are assuming a growth of
 5% to be conservative

Exhibit C-5

Pro Forma
CASHFLOW STATEMENT - PALMCO ENERGY OH, LLC
Year End 2011

January 1 to
December 31
2011

CASH FLOWS FROM OPERATING ACTIVITIES:

Cash Received from Customers \$ 152,250
Cash Paid to Suppliers & Employees (85,850)

Net Cash Provided by (Used In) Operating Activities 66,400

Total Increase in Cash Equivalents 66,400
Cash Equivalents Beginning of Period 31,500

Cash & Cash Equivalents End of Period \$ 97,900

**Net Provided by (Cash Used) In Operating Activities
as Above** \$ 97,900


For the Year 2011, we are assuming a growth of
5% to be conservative

P6

Exhibit C-6
 +
 Exhibit C-7

This DNB report is provided for your review it may not be used for any other purpose or provided to anyone else.

For: ROBERT PALMESE, Phone: 800-234-3867

		<h2>BUSINESS INFORMATION REPORT</h2>	
PALMCO ENERGY OH LLC 1350 60TH ST BROOKLYN NY 11219 TEL: 718 851-6655		DUNS: 83-007-7736 RATING DS NATURAL GAS DISTRIBUTION SIC NO. 4924 STARTED 2009 EMPLOYS 1 HISTORY CLEAR	
ROBERT PALMESE, MEMBER RECORD TYPE: DUNS SUPPORT			
SPECIAL EVENTS			
03/31/09 SELF REQUEST: This record was originally created on March 31, 2009 at the request of Robert Palmese, Member. On February 26, 2009, Robert Palmese, Member, confirmed company name, address, principals and operational information using Dun & Bradstreet's Internet-based update method (eUpdate) at www.dnb.com. <p style="text-align: center;">* * * CUSTOMER SERVICE * * *</p> If you have questions about this report, please call our Customer Service Center at 1-800-333-0505 from anywhere within the U.S. If you are outside the U.S. contact your local D&B office. *** Now you can review and make updates to your company's D&B information online at our secure site with D&B eUpdate. Just visit www.dnb.com/eUpdate to get started. Update Online, Anytime. *** <p style="text-align: center;">* * * SUMMARY ANALYSIS * * *</p> RATING SUMMARY A Summary Analysis is not available at this time.			

P1

PAYMENTS

D&B has not received a sufficient sample of payment experiences to establish a PAYDEX score.

D&B receives over 600 million payment experiences each year. We enter these new and updated experiences into D&B Reports as this information is received. At this time, none of those experiences relate to this company.

HISTORY

03/31/09

ROBERT PALMESE, MEMBER

The Ohio Secretary of State's business registrations file showed that Palmco Energy OH LLC was registered as a limited liability company on January 28, 2009, operating out of New York.

Business started 2009.

ROBERT PALMESE. Antecedents are unknown.

OPERATION

03/31/09

Engaged in natural gas distribution (100%).
Terms are undetermined. Sells to undetermined. Territory :
Undetermined.

EMPLOYEES: 1.

FACILITIES: Occupies premises in a building.

01-07(9HQ /045)

001081081

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PALMco

Electricity Sales – Natural Gas Sales
1350 60th Street, Brooklyn, New York 11219
Phone (718) 851-6655 – Fax (718) 851-2427
Family Owned – Established 1938
www.PalmcoEnergy.com

January 7, 2010

To Whom It May Concern:

Palmco has contracted the services of Quantum Gas & Power Services, Ltd (Quantum) in order to schedule its gas in the Ohio deregulated market.

Palmco and Quantum contracted in August 2009 in order for Quantum to provide its services to Palmco Eenergy OH and its affiliates in scheduling electricity in numerous states.


Quantum shall provide all services in order to schedule gas properly through pipeline system and citygates. This includes but is not limited to the physical gas, capacity, nominations, etc.

Quantum has been in business for over a decade and currently provides services for other clients in MD, NY, NJ, OH and PA. Quantum is very familiar with all aspects of scheduling in multiple markets.

Should any additional information be needed, please feel free to contact me, 718 851-6655 or RVPalmese@PalmcoEnergy.com.

Thank you.

Sincerely,



Robert Palmese

REDACTED
EXHIBIT C-4 OF SECTION C-4 OF
PALMCO ENERGY OH, LLC
NATURAL GAS CERTIFICATION APPLICATION

COLUMBIA UTILITIES, L.L.C.

AND

COLUMBIA UTILITIES POWER, L.L.C.

COMBINED FINANCIAL STATEMENTS

DECEMBER 31, 2007

**EXHIBIT C-4 OF SECTION C-4 OF
PALMCO ENERGY OH, LLC
NATURAL GAS CERTIFICATION APPLICATION**

**CONFIDENTIAL AND PROPRIETARY
INFORMATION OMITTED**

REDACTED
EXHIBIT C-4 OF SECTION C-4 OF
PALMCO ENERGY OH, LLC
NATURAL GAS CERTIFICATION APPLICATION

COLUMBIA UTILITIES, L.L.C.

AND

COLUMBIA UTILITIES POWER, L.L.C.

COMBINED FINANCIAL STATEMENTS

DECEMBER 31, 2008

**EXHIBIT C-4 OF SECTION C-4 OF
PALMCO ENERGY OH, LLC
NATURAL GAS CERTIFICATION APPLICATION**

**CONFIDENTIAL AND PROPRIETARY
INFORMATION OMITTED**