



Public Utilities Commission

Competitive Retail Natural Gas Service
(CRNGS)
Abandonment Application (**With customers**)

Case Number: 02 - 1786 - GA - CRS

Please complete all information. Identify all attachments with a label and title (example: Exhibit C-2 Financial Statements). For paper filing, you can mail the original and three complete copies to the Public Utilities Commission of Ohio, Docketing Division, 180 East Broad Street, Columbus, Ohio 43215-3793.

A. Application Information

A-1. Applicant's legal name and contact information.

Provide the name and contact information of the business entity.

Legal Name: Volunteer Energy Services, Inc.
Street Address: 790 Windmill Drive
City: Pickerington State: OH Zip: 43147
Telephone: (800) 977-8374 Website: www.volunteerenergy.com

A-2. Contact person for regulatory matters.

Name: Kurt J. Boehm
Street Address: 36 East Seventh Street, Suite 1510
City: Cincinnati State: OH Zip: 45202
Telephone: (513) 421-2255 Email: kboehm@bkllawfirm.com

A-3. Certification Information.

Certification case number: 02-1786-GA-CRS Certificate number: 02-022(1)

B. Operation Information

Provide a response or attachment for each of the sections below.

B-1. Date applicant will cease operations.

Date: See attached Motion

B-2. Customer transfer.

Indicate whether contracts will be assigned or if customer contracts will be switched back to their Utility.

Contracts will be assigned



Customers will be switched back to their Utility.



B-3. If contracts were/will be assigned, to whom?

If applicable, please provide the name of which company will be taking over customer contracts.

See attachment

B-4. Billing Cycle.

In which month's billing cycle will the customer be switched or assigned?

Billing cycle month: See attachment

B-5. Number of Ohio customers.

How many customers are currently served by the applicant in each Utility service area?

Columbus Gas of Ohio: See Attachment	Dominion Energy Ohio:	Duke Energy Ohio:	Vectren Energy Delivery of Ohio:
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C. Additional Exhibits

Provide an attachment for each of the sections below.

C-1. Notice to Director of the Service Monitoring and Enforcement Department.

Provide a dated copy of the notice of applicant's intent to assign customer contracts, pursuant to 4901:1-21-11 and/or 4901:1-29-10 of the Ohio Administrative Code, that was sent to the PUCO Service Monitoring and Enforcement Department Director.

C-2. Utility notice.

Provide a dated copy of the notice of the applicant's intent to cease providing service, pursuant to 4901:1-24-12 and/or 4901:1-27-12 of the Ohio Administrative Code, that was sent to each LDC or EDU in each certified territory in which the provider operates.

C-3. Customer notice.

Provide a dated copy of the notice of the provider's intent to abandon service, pursuant to 4901:1-24-12 and/or 4901:1-27-12 of the Ohio Administrative Code, that was sent to customers.

As authorized representative for the above company/organization, I certify that all the information contained in this application is true, accurate and complete. I also understand that failure to report completely and accurately may result in penalties or other legal actions.

Signature _____

May 4, 2022

Date _____

Counsel for Volunteer Energy Services, Inc.
Title

Attachment: Responses to B-3, B-4 & B-5

B-3: Direct Energy Services, LLC.

B-4: The utilities took responsibility for customer gas supply on 4/1/22 with the vast majority of customers being switched/assigned on the April billing cycle. A small number of customers appear to be being switched/assigned on in May and June.

B-5: Below is a chart of customers as of 5/1/22 that have yet to be transitioned.

Utility	Customer Count	End Date
Columbia Gas of Ohio	0	5-10-2022
Dominion Energy Ohio	33	5-14-2022
Duke Energy Ohio	3,592	6-9-2022
Vectren Energy Delivery of Ohio	105	5-10-2022

**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 Retail Natural Gas Supplier	: : : :	Case No. 02-1786-GA-CRS
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**VOLUNTEER ENERGY SERVICES, INC.’S
MOTION FOR WAIVER OF OAC RULE 4901:1-27-12(B)**

OAC Rule 4901:1-27-12(B) prescribes that the Commission will issue an order approving abandonment applications 90 days after filing. Volunteer Energy Services, Inc. (“Volunteer Energy”) respectfully moves that the Public Utilities Commission of Ohio instead delay approving Volunteer Energy’s Abandonment Application for 180 days after its abandonment application is filed.

MEMORANDUM IN SUPPORT

Volunteer Energy Services, Inc. (“Volunteer Energy”) was granted a Certification as a Competitive Retail Natural Gas Supplier in the above captioned docket. On March 25, 2022 (the “Petition Date”), Volunteer Energy filed a voluntary petition (the “Bankruptcy Case”) for chapter 11 relief under title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the Southern District of Ohio (the “Bankruptcy Court”). A portion of Volunteer Energy’s customers have been returned to default service while other customers have been assigned to another CRNGS. On May 4, 2022, Volunteer Energy filed its Application to Abandon its CRNGS Certification.

OAC Rule 4901:1-27-12(B) prescribes that the Commission will issue an order approving abandonment applications 90 days after filing. There is good cause for the Commission to grant Volunteer Energy's Motion to waive this Rule and instead approve Volunteer Energy's application after 180 days. Volunteer Energy is working diligently in its Bankruptcy Case to conduct an orderly winddown of its affairs while concurrently working to ensure an orderly transition of its customers. In the short time since the Petition Date, Volunteer Energy has: (i) obtained an emergency order from the Bankruptcy Court authorizing Volunteer Energy to take all necessary actions to transition and transfer its customers to local distribution companies ("LDCs"); (ii) consummated a sale of thousands of customers to an alternative retail energy supplier; (iii) obtained Bankruptcy Court approval to reject Volunteer Energy's remaining customer contracts and orderly transition such customers to default service; and (iv) worked closely with LDCs to complete the foregoing tasks. Volunteer Energy has accomplished many tasks; however, additional time is needed to ensure that there are no impediments to concluding Volunteer Energy's orderly winddown, including abandoning its CRNGS Certification. Although Volunteer Energy intends to abandon its CRNGS Certification, it is unlikely that Volunteer Energy's orderly winddown will be completed within 90 days. Accordingly, Volunteer Energy asserts that there is good cause to waive the 90-day requirement set forth in OAC Rule 4901:1-27-12(B) and extend the requirement to 180 days. If at any time Volunteer Energy's winddown is completed in advance of the 180 days, Volunteer Energy will notify the Commission.

WHEREFORE, Volunteer Energy respectfully requests that the Public Utilities Commission of Ohio issue an order granting Volunteer Energy's Motion to delay approving Volunteer Energy's Abandonment Application for 180 days after its abandonment application is filed.

Respectfully submitted,

/s/ Kurt J. Boehm

Kurt J. Boehm, Esq.

BOEHM, KURTZ & LOWRY

36 East Seventh Street, Suite 1510

Cincinnati, Ohio 45202

Ph: (513) 421-2255 Fax: (513) 421-2764

E-Mail: kboehm@BKLawfirm.com

May 4, 2022

CERTIFICATE OF SERVICE

In accordance with Rule 4901-1-05, Ohio Administrative Code, the PUCO's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the service list of the docket card who have electronically subscribed to this case. In addition, the undersigned certifies that a courtesy copy of the foregoing document is also being served via electronic mail (when available) or Regular U.S. Mail on the 4th day May, 2022 to the following:

/s/ Kurt J. Boehm

Kurt J. Boehm, Esq.

*EINSTEIN IV, ESQ., JOHN L. MR.
VOLUNTEER ENERGY SERVICES
790 WINDMILLER DRIVE
PICKERINGTON OH 43147

CURNUTTE, RICHARD PRESIDENT
VOLUNTEER ENERGY SERVICES
790 WINDMILLER DRIVE
PICKERINGTON OH 43147

*MEYER, TAMMY M. MRS.
DUKE ENERGY
139 EAST 4TH STREET 12TH FLOOR
CINCINNATI OH 45202

*FISCHER, MARY E. MS.
PUCO
180 E. BROAD ST.
COLUMBUS OH 43215

*KENNEDY, CHRISTOPHER T.
WHITT STURTEVANT LLP
88 EAST BROAD STREET SUITE 1590
COLUMBUS OH 43215

VAYSMAN, LARISA
DUKE ENERGY OHIO INC
139 EAST FOURTH STREET, ML 1303
CINCINNATI OH 45202

*THOMPSON, MELISSA L. MS.
COLUMBIA GAS OF OHIO, INC.
290 W. NATIONWIDE BLVD
COLUMBUS OH 43215

*MAGAZINER-TEMPESTA, ALLA MS.
180 E BROAD ST
COLUMBUS OH 43015

D'ASCENZO, ROCCO O.
DUKE ENERGY OHIO
139 EAST FOURTH ST 1303-MAIN
CINCINNATI OH 45202

**This foregoing document was electronically filed with the Public Utilities
Commission of Ohio Docketing Information System on**

5/4/2022 2:00:27 PM

in

Case No(s). 02-1786-GA-CRS

Summary: Application Volunteer Energy Services Application to Abandon CRES
Certification electronically filed by Mr. Kurt J. Boehm on behalf of Volunteer Energy
Services, Inc.