



Public Utilities Commission

PUCO USE ONLY – Version 1.07		
Date Received	Case Number	Certification Number
	- GA-GAG	

CERTIFICATION APPLICATION OHIO NATURAL GAS GOVERNMENTAL AGGREGATORS

Please type or print all required information. Identify all attachments with an exhibit label and title (*Example: Exhibit B-1 – Authorizing Ordinance*). 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, 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

A-1 Applicant information:

Note: If filing as a township or village, please include the name of the County where the township or village is located in the applicant name. For example, Miami Township, Hamilton County

Legal Name Allen County

Address 204 North Main Street, Suite 301, Lima, OH 45801

Telephone No. 419-228-3700 ext. 8725

Web site address www.allencountyohio.com

Current PUCO Certificate Number

Effective Dates

County Allen

A-2 Contact person for regulatory or emergency matters:

Name Andrea Flowers

Title Program Manager

Business Address 5577 Airport Highway, Suite 101, Toledo, OH 43615

Telephone No. 419-539-9180

Fax No. 419-539-9185

Email Address aflowers@palmerenergy.com

A-3 Contact person for Commission Staff use in investigating customer complaints:

Name Andrea Flowers

Title Program Manager

Business address 5577 Airport Highway, Suite 101, Toledo, OH 43615

Telephone No. 419-539-9180

Fax No. 419-539-9185

Email Address aflowers@palmerenergy.com

A-4 Applicant's address and toll-free number for customer service and complaints:

Customer service address 5577 Airport Highway, Suite 101, Toledo, OH 43615

Toll-Free Telephone No. 877-410-5214


Fax No. 419-539-9185

Email Address aflowers@palmerenergy.com

SECTION B - APPLICANT AUTHORITY AND AGGREGATION PROGRAM INFORMATION

PROVIDE THE FOLLOWING AS SEPARATE ATTACHMENTS AND LABEL AS INDICATED

- B-1** Exhibit B-1 "Authorizing Ordinance," provide a copy of the adopted ordinance or resolution that reflects voter authorization to form a governmental aggregation program pursuant to Sections 4929.26 and 4929.27 of the Ohio Revised Code.
- B-2** Exhibit B-2 "Operation and Governance Plan," provide a copy of the applicant's plan for operation and governance of its aggregation program adopted pursuant to Sections 4929.26(C) or 4929.27(B) of the Revised Code. The Operation and Governance Plan should include all information pursuant to Rule 4901:1-28-03 of the Ohio Administrative Code.
- B-3** Exhibit B-3 "Automatic Aggregation Disclosure Notification," if the aggregation program provides for automatic aggregation in accordance with Section 4929.26(A) of the Revised Code, provide a copy of the disclosure notification required by Section 4929.26(D) of the Revised Code,
- B-4** Exhibit B-4 "Opt-Out Notice," provide a draft copy of the applicant's opt out notice that comports with the Opt-Out disclosure requirements pursuant to Rule 4901:1-28-04 of the Ohio Administrative Code. *(Ten days prior to public dissemination, the applicant shall docket with the Commission, the finalized Opt-Out notice that provides or offers natural gas aggregation service.)*
- B-5** Exhibit B-5 "Experience," provide a detailed description of the applicant's experience and plan for: providing aggregation services *(including contracting with consultants, broker/aggregators, retail natural gas suppliers)*; providing billing statements; responding to customer inquiries and complaints; and complying with all applicable provisions of Commission rules adopted pursuant to Section 4929.22 of the Ohio Revised Code and contained in Chapter 4901:1-29 of the Ohio Administrative Code.

Applicant Signature and Title  President

Sworn and subscribed before me this 22 day of November Month 2022 Year


Signature of official administering oath

Brittany N. Klingler
Print Name and Title

My commission expires on Jan. 24, 2023



BRITTANY N. KLINGLER
Notary Public, State of Ohio
My Commission Expires
January 24, 2023



The Public Utilities Commission of Ohio

Ohio Natural Gas Governmental Aggregation
Affidavit Form
(Version 1.07)

In the Matter of the Application of)

Allen County)

for a Certificate or Renewal Certificate to Provide)
Natural Gas Governmental Aggregation Service in)
Ohio.

Case No. [] -GA-GAG

County of [Allen]
State of [Ohio]

Brian Winegardner, President

[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

Brian Winegardner, President

Sworn and subscribed before me this

22

day of

November

Month

2022

Year

Brittany N. Klingler

Signature of Official Administering Oath
BRITTANY N. KLINGLER

Brittany N. Klingler, Clerk

Print Name and Title



Notary Public, State of Ohio
My Commission Expires
January 24, 2023

My commission expires on

Jan 24, 2023

Allen County

Exhibit B-1

**Authorizing
Ordinance/Resolution**

**RE: BOARD OF COUNTY COMMISSIONERS APPROVES AND ADOPTS
A PLAN OF OPERATION AND GOVERNANCE FOR ALLEN COUNTY
NATURAL GAS AGGREGATION PROGRAM ACORDING TO ORC
Section 4929.26.**

The Board of County Commissioners of Allen County, Ohio, met in regular session on the 22nd day of November, 2022 with the following members present: Cory Noonan and Brian Winegardner Not Present: Beth Sibert

Commissioner_Noonan___ moved for the adoption of the following:

RESOLUTION

WHEREAS, on November 8, 2022 a majority of voters in Allen County, Ohio approved a referendum that authorized the formation of an "opt-out" governmental aggregation in compliance with Section 4929.26 of the Ohio Revised Code regarding the governmental aggregation of natural gas rate payers; and

WHEREAS, these communities decided to utilize their aggregation authority jointly through Allen County as permitted under Section 4929.26 of the Ohio Revised Code; and

WHEREAS, Allen County anticipates that utilizing its aggregation authority will provide individual residential and small commercial consumers benefits such as price reductions that these consumers are typically unable to obtain since they lack the bargaining power, expertise and the economies of scale enjoyed by larger consumers; and

WHEREAS, under an opt-out aggregation program, all eligible residential and small business customers in the authorized areas of Allen County are automatically included as participants in the Aggregation Program unless they opt-out of the program by providing written notice of their intention not to participate. As required by Ohio Law, the various communities jointly participating in the Allen County governmental aggregation shall pass a resolution/ordinance, which authorizes submitting the selection of opt-out aggregation to the community's voters; and

WHEREAS, in addition to obtaining the necessary voter approvals, Allen County, Ohio is also required to comply with various PUCO regulations. As required by PUCO regulations, the County will file an application with the PUCO for certification as a Government Aggregator upon approval of the Aggregation Plan of Operations and Governance; and

WHEREAS, as required by regulations, the County shall advertise and conduct two (2) public hearings to discuss the Plan; and

WHEREAS, the County anticipates selection of a Provider prior o or shortly after receiving approval from the PUCO as a governmental aggregator. Upon Provider selection, an Opt-out notice for the County's Program will be sent to all eligible natural gas customers setting

forth the rates, terms and conditions of the program. This notice will provide potential aggregation participants at least 21 days to return an opt-out card or similar notice; and

WHEREAS, the supply contract negotiated between the Governmental Aggregator and the selected Provider shall be for firm full requirements power supply. Each aggregation participants shall be individually bound by the terms and conditions found in the opt-out notice and the Contract and shall be solely responsible for payment and performance. The natural gas supply charges for Aggregation participants shall be negotiated and included in the contract.

WHEREAS, the County's Retail Natural Gas Provider shall meet requirements as set forth in the Allen County Natural Gas Government Aggregation Plan of Operation and Governance, a copy of which is attached hereto and made a part hereof; and

WHEREAS, Government aggregation provides a means for residential consumers and small commercial consumers in the County to obtain economic benefits from Ohio's competitive retail electric market. The County Aggregation Program combines the natural gas loads of residential customers and small commercial consumers into a buying group, in which the County will act as Purchasing Agent; and

WHEREAS, the Board of Allen County Commissioners are aware that it is necessary to conduct public hearings for natural gas aggregation prior to adoption of the Allen County Natural Gas Government Aggregation Plan of Operation and Governance; and

BE IT RESOLVED, that the Board of County Commissioners of Allen County, Ohio, adopts the Allen County Natural Gas Governmental Aggregation Plan of Operation and Governance, which is attached hereto and made a part thereof; and be it further

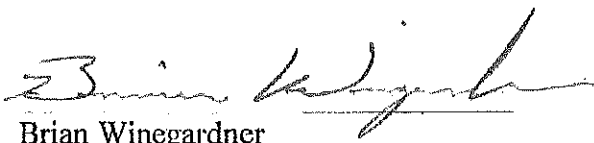
RESOLVED, this Board of County Commissioners hereby finds and determines that all formal actions relative to the adoption of this resolution were taken in an open meeting of this Board; and that all deliberations of this Board and of its committees, if any, which resulted in formal action, were taken in meetings open to the public in full compliance with applicable legal requirements, including Section 121.22 of the Revised Code.

Commissioner Winegardner seconded the resolution and upon the roll being called, the vote resulted as follows: Commissioner Seibert, Not Present; Commissioner Noonan, yes; Commissioner Winegardner, yes.


Adopted this 22nd
day of November 2022

**BOARD OF COUNTY COMMISSIONERS
ALLEN COUNTY, OHIO**

Beth Seibert


Brian Winegardner


Cory Noonan


Britany N. Woods

Allen County

Exhibit B-2

**Operation and
Governance Plan**

Allen County

Natural Gas Aggregation Program Plan of Operation and Governance

Approved _____, 202

Purpose

The goal of this “opt-out” governmental aggregation program is to facilitate additional choices for the supply of natural gas for eligible residential and commercial consumers, pursuant to Ohio Revised Code section 4929.26.

The Allen County Natural Gas Aggregation Program seeks to aggregate the retail natural gas loads of consumers located in the County to obtain the lowest price for the supply of natural gas. Participation in the County of Allen aggregation program is limited to individuals who are not already under contract with an alternative CRNGS.

This program is voluntary. Every eligible customer has the opportunity to decline to be a member of the aggregation program and to remain with Dominion East Ohio (WOG) or to enter into a natural supply contract with any other competitive retail natural gas services provider (CRNGS).

Process

On November 8, 2022, the Allen County, Ohio voters approved the development of a form of natural gas government aggregation, known as opt-out aggregation. The County shall follow the process of governmental aggregation as set out in Ohio Revised Code section 4929.26 and the rules set out by the Public Utilities Commission of Ohio (PUCO).

These communities decided to utilize their aggregation jointly through Allen County, Ohio as permitted under Section 4929.26 of the Ohio Revised Code. A municipal corporation may automatically aggregate its residents after passage of an opt-out ordinance, approval by a majority of the voters and adoption of a Plan of Operation. The County has accomplished all of these requirements.

The process will entail selection of a Competitive Retail Natural Gas Supplier (CRNGS), mailing opt-out notices to eligible customers, generating a list of participants who did not opt out, then transferring the participants to the chosen CRNGS.

County of Allen Aggregation Program

The purpose of the aggregation program is to reduce the amount consumers pay for natural gas. The County will not buy and resell the natural gas for the participants of the program. Instead, The County of Allen and its energy consultant will competitively bid and negotiate a contract with a CRNGS to provide natural gas to the members of the aggregation program.

The County of Allen will obtain the list of customers within its boundaries from Dominion East Ohio, either by zip code or by method provided by the utility. The County will have its CRNGS cleanse the data to ensure that it does not contain customers with alternate suppliers, PIPP customers, and any other excludable consumers, and only those who live within the jurisdictional boundary. The County will then have its CRNGS send an opt-out notice to each eligible customer which discloses the offered price for natural gas along with any applicable contract terms. The opt-out notice will clearly inform potential customers that they may opt-out of the program during the 21-day period following the mailing of the notification, along with instructions on how to opt-out. Customers who opt-out of the County's aggregation program during this initial notification period will remain with Dominion East Ohio(WOG) unless and until the customer chooses an alternative CRNGS or chooses to opt-in to the aggregation program at a later date.

Operation

All necessary technical analysis, competitive procurement of services, regulatory approvals, accounting and fiscal management, contract maintenance, communications, program coordination and administrative support will be professionally provided by existing staff and an energy consultant, as well as the chosen CRNGS.

Funding

The primary expenses associated with operating this program are printing and mailing cost of the opt-out notices, and fees for an energy consultant. Instead of paying for these costs upfront, it shall be The County's goal to have the chosen CRNGS absorb these fees into their offered rates of the program participants.

Notification of Customers

All eligible customers in The County of Allen will receive opt-out information in the mail. The County of Allen will adhere to all eligibility requirements of R.C. 4929.26. Essentially, eligible customers cannot be under contract to buy natural gas from an alternate CRNGS or a mercantile customer.

The opt-out notice shall clearly inform customers of the offered rate, and that they have the right to opt-out of The County's aggregation program within twenty-one days after the mailing of the notice without paying a switching fee. The opt-out notice will fully describe how to opt-out. After the completion of the opt-out process, the residents who did not opt out will be included in The County's aggregation program.

Customer opt-out

Customers may opt-out of The County of Allen aggregation program at no charge within the twenty-one day period following the mailing of the notice containing the rates and terms of the aggregation program. Customers who return the required opt-out notice will remain customers of Dominion East Ohio (WOG). The County will offer the twenty-one day period during which customers can opt-out of the aggregation program without charge at least every two years pursuant state law.

Customer opt-in

The County of Allen intends on having its supplier allow customers who move into or within The County of Allen to opt into The County's aggregation program by calling and voluntarily signing up with the supplier. The County will strive to provide these new customers with a rate similar to those who had been in the pool from the beginning. Additionally, the County's supplier may obtain a refreshed customer list from Dominion East Ohio approximately every six months. The County's supplier may then send aggregation information to those eligible customers identified on the refresher list. Whether this information is in opt-in or opt-out format will depend on the negotiated language of the supplier contract. If interim opt outs are to take place; a twenty-one day opt-out will occur in the manner described above.

Joining the Program at a later date

Residents of the County who initially chose to opt-out of the Program, for whatever reason, and wish to enroll at a later date, will be treated the same as a new resident. That is they will not automatically become part of the existing program, but will be given an opportunity to enroll. However, the County cannot guarantee that rates, terms and conditions to consumers enrolling in the Aggregation after the initial 21 day opt-out period, will match those of the initial enrollee.

Disputes

The procedure for handling complaints will be in accordance with the rules set by the PUCO, and handled by the retail natural gas supplier. Dispute resolution provisions will also be in accordance with PUCO regulations. The opt-out package will contain the telephone numbers and websites for the PUCO and the Ohio Consumers Counsel, as well as the supplier's toll-free number.

The County of Allen supplier will maintain this toll free number for all customer related questions and complaints. The County shall require that the personnel assigned to answer these calls be trained and provided the knowledge specific to The County's program.

Termination of natural gas supply program

The natural gas supply program may be terminated at the expiration of the supply contract without any extension, renewal or subsequent supply contract being negotiated.

In either event, the aggregation pool customers will return to Dominion East Ohio (WOG) unless and until they switch to an alternate supplier. Each individual customer receiving natural gas supply service under The County of Allen aggregation program will receive notification of the termination of the program before termination.

Rates

The Department of Public Utilities shall receive proposals from CRNGS using a competitive selection process. Bidders will be requested to provide a fixed price, floating price, a percent off rate, or a combination of the above. If consumers will have the option of choosing between fixed and floating prices, the opt-out package will contain ample and easy to understand information to aid the consumer in deciding which option best suits their natural gas needs. The County will decide which pricing structure(s), to offer based on the bids received, and an analysis of the current and projected market status as well as the bids received.

Billing and Payment

The County of Allen will continue to have Dominion East Ohio (WOG) bill customers monthly, using an itemized format approved by the PUCO. The County will not become involved in any payment delinquency issues and thus will not require any type of consumer credit or deposit. If The County's supplier wishes to pursue payment delinquency issues, details of the supplier's credit and deposit policies will be included in the opt-out package.

Dominion East Ohio (WOG) will continue to deliver the natural gas purchased on the County's aggregation program through its natural gas distribution system. Participants with questions or concerns regarding service delivery or safety, such as a natural gas outage or gas odor should continue to contact Dominion East Ohio (WOG). Meter readings and other billing questions should also continue to be directed to Dominion East Ohio (WOG).

Questions or concerns regarding the aggregation program should be directed to the CRNGS or the County of Allen.

Question or Concern	Contact	Telephone Number
Gas Odor or leaks	Dominion East Ohio Delivery	1-877-542-2630
Turn on or off gas service	Dominion East Ohio (WOG) Delivery	1-877-542-2630
Billing Disputes	Dominion East Ohio (WOG) Delivery	1-877-542-2630
Enroll or opt-out of program	CRNGS	1-800-XXX-XXXX
Program Questions or Concerns	CRNGS	1-800-XXX-XXXX
Unresolved Disputes	Public Utilities Commission of Ohio	1-800-686-7826 (voice) 1-800-686-1750 (TDD)
Unresolved Disputes	Ohio Consumers Council	1-877-742-5622 or occ@occ.state.oh.us

Liability

The County shall not be liable to Members in the Aggregation Group for any claims whatsoever arising out of the aggregation program or the provision of aggregation services by the County or the Provider. Aggregation Group members shall assert any such claims solely against the Provider pursuant to the Power Supply Agreement, under which such participants are express third-party beneficiaries.

Copies of Plan

Copies of this plan are available from the County of Allen free of charge. Call The County at 419-228-3700 ext. 8725, for a copy or for more information.

Consumer Right to Contact PUCO

Any natural gas customer, including any participant in The County of Allen Natural Gas Aggregation Program, may contact the Public Utilities Commission of Ohio (PUCO) for information, or make a complaint against the Program, the Provider, or Dominion East Ohio (WOG). The PUCO may be reached toll free at 1-800-686-7826. The PUCO may be reached at 1-800-686-1570 for all TDD/TYY calls. The Ohio Consumers' Counsel may be reached at 1-877-742-5622.

Allen County

Exhibit B-3 and B-4

Automatic Aggregation

Disclosure

Opt – Out Notice

DRAFT

Sample Customer
Sample Address
Sample City, OH Zip

This notification is in regards
to your gas service at:
Sample Address

Sample City, Oh Zip

Dec__ 2022

Dear Customer,

Allen County, Ohio is providing you the opportunity to join other residents to save money on the natural gas you use. Savings are possible through governmental aggregation, where your community officials bring together citizens to gain group buying power for the purchase of natural gas from a competitive retail natural gas service provider certified by the Public Utilities Commission of Ohio. Your community voters approved this program on November 8, 2022.

Your community has selected __XX Energy__ as the program supplier. XX Energy will provide a program that offers a variable price calculated monthly using the NYMEX last day settle price plus basis rate/Ccf beginning with _____ meter read cycle through _____ meter read cycle.

About the New Program

- Basis Rate \$0.000 per Ccf for June 20XX through May 20XX
- Dominion East Ohio (WOG) is still your utility and will continue to provide monthly billing and service.
- You will still contact Dominion East Ohio (WOG) for all service calls and emergencies.
- Budget billing and auto payments are still available from Dominion East Ohio (WOG).
- Call XX Energy Monday – Friday 7am- 7pm at 800-362-7557

You're Automatically Enrolled

There is no cost to enroll. Enrollment is automatic for those who are eligible, but participation is voluntary. You may opt-out of this program without penalty at any time for any reason by providing notice to XX Energy.

How to Opt-Out

You don't need to do anything to get this new rate; however, if you do not want to be automatically enrolled in the aggregation program, please respond with one of the options below by January __ 2023:

1. **Mail:** Return the form below in the pre-addressed envelope
2. **Phone:** Call XX Energy at 1-888-XXX-XXXX
3. **Web:** Visit www.XXEnergy.com

We look forward to providing this program
Sincerely,

XX Energy

DRAFT

To receive these savings, you do not have to do anything.

If you do not want to participate in the Allen County electric governmental aggregation program, Return the opt-out form in by the deadline date listed.

Option 1: Do nothing and save.
If you want to participate in this program and save, you do not need to return this form. Your enrollment is automatic.

OR

Option 2: Opt out by returning this form.
If you do not want to participate in this program, you must return this form before the due date.

OPT-OUT FORM

XX Energy

I do not want to participate in the Allen County Natural Gas Governmental Aggregation Program.

_____ Home Cell (please circle one) Opt Out Code: _____
Phone number

_____ City/State _____ Zip _____
Service Address

Dominion East Ohio (WOG) Account Number: _____

_____ Date _____
Account holder's signature

Allen County

Exhibit B-5

Experience

Experience

Allen County officials are experienced in negotiating and providing for common services for the County. However, due to the complexity of Governmental Aggregation, the County has selected Palmer Energy Company, to assist them in designing, implementing and maintaining the Program.

Allen County has been an active member in the natural gas and electric energy programs of the County Commissioners Association Service Corporation (CCAOSC). The CCAOSC Energy Programs were designed specifically to help counties save money on their natural gas and electric bills by utilizing the strength of group buying. By grouping together, counties can leverage their buying power when shopping the market, thus securing the best deals possible. The independent energy professionals of Palmer Energy Company, on behalf of the CCAOSC, obtained the best price for natural gas from various reputable suppliers through the RFP process

Palmer Energy Company is a Toledo based energy consulting firm founded in 1980. Palmer Energy was a natural gas industry pioneer by working on their customers' behalf as an external consultant. Purchased by Mark Frye in 1994, Palmer Energy has become a leader in unbiased energy management and consulting. While its evolution continues alongside the energy industry, Palmer Energy Company is dedicated to operating as an integral member of a client's energy management team.

Palmer Energy is also the energy consultant for The Northwest Ohio Aggregation Coalition (NOAC). NOAC is a coalition of communities in Lucas and northern Wood Counties providing governmental aggregation services for electric and natural gas customers within the Cities of Maumee, Northwood, Oregon, Perrysburg, Rossford, Sylvania, Toledo and Waterville, the Villages of Delta, Holland, Ottawa Hills and Walbridge, the Wood County Townships of Lake and Perrysburg, and all the unincorporated township areas of Lucas County (through the Board of County Commissioners, Lucas County, Ohio). Mark Frye, President of Palmer Energy, is NOAC's designated consultant and has testified on behalf of NOAC in several matters before the Public Utilities Commission of Ohio.

Palmer Energy Company will:

- Assist the day to day administration of program (problem resolution, press releases, PUCO compliance, supplier liaison, contract review, etc.)
- Design and issue the Request for Proposal, analyze supplier responses and provide recommendations for the supply agreement.
- Review customer data provided by the utility that would serve as the basis for an opt-out notice. Provide customer service support for consumers in the County to call for information during the 21-day enrollment and opt out period for the County's Aggregation Program.
- Respond to customer inquiries, billing questions and/or complaints. While the billing of customers for the retail generation supply will be provided through the natural gas utility Dominion East Ohio (WOG), and the billing process will be coordinated with WOG by the selected supplier, for the Aggregation Group, Palmer Energy will offer assistance as needed on behalf of the County.

- Write and prepare reports on a quarterly/annual basis to the County, PUCO, PUCO's Market Monitoring division, and the Ohio Consumers' Counsel.
- Palmer Energy is well versed in the rules adopted by the PUCO, and is thus in a position to ensure compliance with all applicable provisions of Section 4928.10 of the Revised Code, and the rules adopted by the Commission pursuant thereto.

Contact information for Palmer Energy Company

Mark R. Frye, President
5577 Airport Highway, Suite 101
Toledo, Ohio 43615
419-539-9180 (Office)
419-539-9185 (Fax)
Email: mfrye@palmerenergy.com

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

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in

Case No(s). 23-0100-GA-GAG

Summary: Application In the Matter of the Application of Allen County for
Certification as a Natural Gas Governmental Aggregator electronically filed by Mr.
Mark R. Frye on behalf of Andrea Flowers