

IN THE SUPREME COURT OF THE UNITED STATES

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No. 23-48

INDIANA MUNICIPAL POWER AGENCY, MISSOURI JOINT MUNICIPAL ELECTRIC UTILITY  
COMMISSION, NORTHERN ILLINOIS MUNICIPAL POWER AGENCY,  
AMERICAN MUNICIPAL POWER, INC., ILLINOIS MUNICIPAL ELECTRIC AGENCY,  
AND KENTUCKY MUNICIPAL POWER AGENCY,  
*Petitioners,*

v.

UNITED STATES OF AMERICA,  
*Respondent.*

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**CERTIFICATE OF WORD COUNT**

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Pursuant to Rule 33.1(h) of the Rules of this Court, I certify that the accompanying Reply Brief for Petitioners, which was prepared using Century Schoolbook 12-point typeface, contains 2,995 words, excluding the parts of the document that are exempted by Rule 33.1(d). This certificate was prepared in reliance on the word-count function of the word-processing system (Microsoft Office Word 2016) used to prepare the document.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 1, 2023.



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David C. Frederick  
*Counsel of Record for Petitioners*