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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application for)
Approval of a Pilot Program Regarding)
Mercantile Applications for Special) Case No. 10-834-EL-POR
Arrangements with Electric Utilities and)
Exemptions from Energy Efficiency and)
Peak Demand Reduction Riders.)

**MOTION TO EXTEND FILING DEADLINE AND MEMORANDUM IN
SUPPORT OF PLUG SMART ON BEHALF OF
THE OHIO STATE UNIVERISTY**

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July 27, 2011

On Behalf of Plug Smart

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THE OHIO STATE UNIVERISTY**

Plug Smart moves the Public Utilities Commission of Ohio ("Commission") for an Order extending the filing deadline on behalf of the Ohio State University ("OSU") pursuant to the Second Entry on Rehearing issued by the Commission on May 25, 2011, in the above-captioned matter. The Commission previously determined that Plug Smart had demonstrated that special circumstances warrant granting Plug Smart an extension of the filing deadline. Plug Smart, however, received final authorization from OSU on July 25, 2011, which did not provide sufficient time for Plug Smart to file a mercantile application on OSU's behalf. Special circumstances warrant granting Plug Smart an additional ninety days to file an application on behalf of OSU. For the reasons set out in the accompanying Memorandum, the Motion is warranted and should be granted.

Respectfully Submitted,



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MEMORANDUM IN SUPPORT

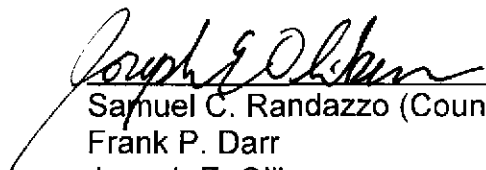
Plug Smart is an energy services company that helps commercial, industrial, non-profit, institutional, and utility companies implement a broad range of technology and energy solutions on both sides of the utility meter. Plug Smart's core capabilities include helping clients implement self-funding energy efficiency projects, leverage renewable energy resources, lower power generation and energy supply costs, and reclaiming investments in energy efficiency projects.

Plug Smart files this Motion to Extend the Filing Deadline on behalf of the Ohio State University ("OSU") pursuant to the Second Entry on Rehearing issued by the Public Utilities Commission of Ohio ("Commission") on May 25, 2011, in the above-captioned matter. OSU implemented energy efficiency and/or peak demand reduction ("EE/PDR") projects in 2006 and 2007.

On May 25, 2011, the Commission issued a Second Entry on Rehearing finding that EE/PDR projects implemented in 2006 and 2007 are eligible for counting and incentives if they are included in a pending application or if the application is filed within thirty days from the Commission's Entry. May 25, 2011 Entry at ¶15. The Commission

also provided that an applicant may seek an extension of “an additional thirty days if warranted due to special circumstances.” *Id.* Pursuant to this provision, the Commission recognized that special circumstances warranted granting Plug Smart an extension of the filing deadline. Administrative approvals, however, could not be obtained until July 25, 2011, which did not provide Plug Smart with sufficient time to file an application on behalf of OSU. Given the administrative procedures and the short time frame ordered by the Commission for the filing of new applications, special circumstances warrant granting Plug Smart an additional ninety days to file an application on behalf of OSU. In recognition of the challenges posed by the short time frame for filing these applications, the Commission granted the Second Application for Rehearing filed by FirstEnergy requesting that customers be granted until March 15, 2012, to file applications for 2006 and 2007 EE/PDR projects. Special circumstances warrant granting Plug Smart an additional ninety days to file an application.

Respectfully Submitted,



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On Behalf of Plug Smart

CERTIFICATE OF SERVICE

I hereby certify that a copy of the *Motion to Extend Filing Deadline of Plug Smart* on behalf of *The Ohio State University*, was sent on July 27, 2011, via electronic transmission, hand delivery, or first class mail, postage prepaid.



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