

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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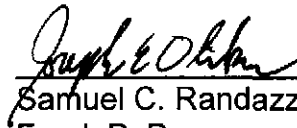
In the Matter of the Application for)
Approval of a Pilot Program Regarding)
Mercantile Applications for Special)
Arrangements with Electric Utilities and)
Exemptions from Energy Efficiency and)
Peak Demand Reduction Riders.)

Case No. 10-834-EL-POR

**MOTION TO EXTEND FILING DEADLINE AND MEMORANDUM IN
SUPPORT OF PLUG SMART ON BEHALF OF
UNIVERSITY HOSPITAL**

Plug Smart moves the Public Utilities Commission of Ohio ("Commission") for an Order extending the filing deadline on behalf of University Hospital ("UH") pursuant to the Second Entry on Rehearing issued by the Commission on May 25, 2011, in the above-captioned matter. Given that UH only recently became aware that its projects to increase energy efficiency were eligible for counting and incentives, Plug Smart did not have time prior to the Commission-imposed deadline to file a mercantile application on UH's behalf. Special circumstances warrant granting Plug Smart an additional ninety days to file an application on behalf of UH. For the reasons set out in the accompanying Memorandum, the Motion is warranted and should be granted.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Samuel C. Randazzo", is written over a horizontal line.

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On Behalf of Plug Smart

**BEFORE
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In the Matter of the Application for)	
Approval of a Pilot Program Regarding)	
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Arrangements with Electric Utilities and)	
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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 University Hospital ("UH") 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. UH 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 has granted extensions in recognition of the difficulty of navigating administrative procedures in the short time frame established by the Commission's Entry.

UH (a non-profit entity) is supplied electric, steam, and chilled water through the University of Cincinnati and has been paying into the electric rider associated with the rebate program. Until a very recent clarification from Duke Energy Ohio, Inc., UH did not realize that its projects to increase energy efficiency could be eligible for counting and incentives. Therefore, Plug Smart requests that it be allowed to apply for rebates for energy efficiency upgrade projects completed by UH in 2006 and 2007 because Plug Smart did not have sufficient time to file an application on behalf of UH. 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 UH.

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 University Hospital* was sent on August 11, 2011, via electronic transmission, hand delivery, or first class mail, postage prepaid.


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