

FAX

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

IN THE MATTER OF THE APPLICATION)
OF ENERGY ALLIANCES, INC. FOR)
RENEWAL OF CERTIFICATION AS A)
COMPETITIVE RETAIL ELECTRIC)
POWER BROKER/AGGREGATOR)


CASE NO. 09-1048 -EL-AGG

MOTION FOR EXTENSION OF TIME
AND REQUEST FOR EXPEDITED RULING

Now comes Energy Alliances, Inc. ("EAI"), and moves the Public Utilities Commission of Ohio or its Attorney Examiner to extend the expiration date of EAI's Certificate No. 09-179E(1), which authorizes it to provide aggregator and electric power broker services in the State of Ohio. The certificate expires on December 3, 2011, and EAI seeks to extend the expiration date until January 2, 2011 to allow for the 30-day review process of its renewal application filed herewith.

EAI also requests that the Commission issue an expedited ruling on its request pursuant to O.A.C. § 4901-1-12(C) & (F). EAI requests this extension and expedited ruling for the reasons set forth in the attached Memorandum in Support.

Respectfully submitted,



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MEMORANDUM IN SUPPORT

Energy Alliances, Inc. ("EAI") was issued Certificate No. 09-179E(1) to provide competitive retail electric aggregation and power broker service for the two-year period ending December 3, 2011. Unfortunately, due to an inadvertent administrative error, EAI believed its renewal application was due December 3, 2011, not realizing that the renewal application paperwork had to be filed not less than 30 nor more than 60 days beforehand. Upon being advised by Commission staff of its error, EAI is submitting the renewal application paperwork herewith. As is demonstrated in the Application, there has been no material change in EAI's business practices as defined by O.A.C. § 4901:1-24-10.

EAI respectfully requests that the Commission extend Certificate No. 09-179E(1) to January 2, 2011 to allow for the 30-day review process of its renewal application and to ensure that there will be no interruption in service to EAI's customers during that period. Due to an administrative oversight, EAI did not make the November 3, 2011 submission date. EAI apologizes for this administrative oversight and will take steps to ensure that this administrative oversight does not recur.

EAI also requests that an expedited ruling be issued on this motion pursuant to O.A.C. § 4901-1-12(C) & (F), considering that its current certificate will expire on December 3, 2011. Because EAI is the only party to this proceeding, an expedited ruling will not adversely affect the substantive right of any party.

The Commission has the plenary authority to extend the expiration date of EAI's certification for good cause shown. EAI mistakenly confused the December 3rd expiration date with the earlier deadline for submission of the renewal paperwork. The press of business compounded the problem as EAI was aware of the December 25 expiration date for its current

gas aggregation certification, and is preparing to file that renewal paperwork shortly. In any event, EAI's business practices and status as a successful aggregator and broker has not changed since the last certifications were issued in 2009.

Consequently, EAI respectfully requests a brief extension of the expiration date of its certification.

Respectfully submitted,



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