BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the Application of Commerce Energy, Inc. dba Just Energy for Renewal of its Certification as a Competitive Retail Natural Gas Supplier.

Case No. 02-1828-GA-CRS

COMMERCE ENERGY, INC. DBA JUST ENERGY'S MOTION FOR EXTENSION OF TIME

Now comes Commerce Energy, Inc. dba Just Energy ("Just Energy"), and moves the Public Utilities Commission of Ohio or its Attorney Examiner to extend the expiration date of Just Energy's Certificate No. 02-023G(5), which authorizes it to provide competitive retail natural gas marketer services in the State of Ohio. The certificate is due to expire on November 22, 2012, and Just Energy seeks to extend the expiration date until November 25, 2012 to allow for the 30-day review process of its renewal application, which will be filed on or before October 26, 2012.

Just Energy requests this extension be granted for the reasons set forth in the attached Memorandum in Support.

Respectfully submitted,

Stephen M. Howard

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Attorneys for Commerce Energy, Inc. dba Just Energy

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MEMORANDUM IN SUPPORT

On December 3, 2010, Commerce Energy, Inc. dba Just Energy ("Just Energy") was issued Renewal Certificate No. 02-023G(5) to provide competitive retail natural gas marketer service for the two-year period commencing November 12, 2010 and ending November 22, 2012. Unfortunately, due to an inadvertent administrative error, Just Energy will be filing its renewal application on October 26, 2012, three days after the October 23, 2012 deadline.

Just Energy respectfully requests that the Commission extend Certificate No. 02-023G(5) by three days to November 25, 2012 so that there will be no interruption in service to Just Energy's customers. Due to an administrative oversight, Just Energy was unable to meet the October 23, 2012 submission date. Just Energy apologizes for this administrative oversight and ensures the Commission that consistent with Just Energy's past practice, all reports and certifications required by the Commission will be timely filed in the future. Furthermore, Just Energy emphasizes its desire to continue to serve customers in Ohio and hopes the Commission will take into account this commitment and Just Energy's record of service in this state when making its decision on its Motion for Extension of Time.

The Commission has the plenary authority to extend the expiration date of Just Energy's certification for good cause shown. As demonstrated above, Just Energy's tardiness in filing its

Application was solely due to an inadvertent administrative error. Consequently, Just Energy respectfully requests a brief extension of the expiration date of its certification.

Respectfully submitted,

Stephen M. Heured M. Howard Petricoff

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Attorneys for Commerce Energy, Inc. dba Just Energy

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing document was served upon the following persons via electronic mail this 26th day of October, 2012.

Stephen M. Howard

John.jones@puc.state.oh.us sauer@occ.state.oh.us

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Summary: Motion Motion for Extension of Time electronically filed by Mr. Stephen M Howard on behalf of Commerce Energy, Inc. dba Just Energy