

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Avion
Energy Group, LLC for Certification as an
Aggregator/Power Broker

)
)
) Case No. 11-5838-EL-AGG
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**AVION ENERGY GROUP, LLC'S
MOTION FOR EXTENSION OF CERTIFICATE EXPIRATION DATE**

The Avion Energy Group, LLC respectfully requests the date for the expiration of its current certification as a Competitive Retail Electric Service Provider be extended until January 23, 2014. The reasons supporting this motion are contained in the Memorandum in Support attached hereto and incorporated herein.

Respectfully submitted on behalf of,
AVION ENERGY GROUP, LLC



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MEMORANDUM IN SUPPORT

Avion Energy Group, LLC (“Avion Energy”) respectfully requests that the effectiveness of its Competitive Retail Electric Service Provider Certificate Number 12-422E (1) be extended until January 23, 2014. Due to an administrative oversight, Avion Energy delayed the filing of its application for renewal of its certificate, rather than November 30, 2013, as Ohio Administrative Code (“O.A.C.”) Rule 4901:1-24-09(A) would otherwise require. As Avion Energy’s current certificate expires on December 31, 2013, and the Public Utilities Commission of Ohio (“the Commission”) has 30 days to review the application for renewal, an extension is necessary to ensure the continuity of certification.

Avion Energy was formed in July of 2010 in Atlanta, Georgia with the intent to serve commercial and industrial energy consumers by simplifying their energy decisions and providing them with best energy pricing. By June of 2011, Avion Energy had created relationships with 25 Energy Providers licensed to do business in 22 States, covering 59 electric utilities and 57 natural gas utilities. Avion Energy’s customer base is diverse, mostly comprised of small to medium sized energy consumers covering a broad base of industries. Avion Energy Certification for Aggregators/Power Brokers was first approved on December 31, 2011.

It is reasonable for the Commission to extend Avion Energy’s certification. See, *In the Matter of the Application of the City of Norwood*, Case No. 10-390-GA-GAG (Entry dated May

10, 2012) (where the Commission granted applicant's motion for extension of expiration date, although the expiration had already passed). Granting Avion Energy's request for extension of certification expiration date until its certificate is renewed will allow Avion Energy to continue to provide its services and avoid the administrative upheaval that could occur if its certification is cancelled.

Avion Energy submits that there is no reason or circumstance that warrants suspension or rescission of its certificate. There have been no material or adverse changes in its financial or operational status or its ability to provide the services it seeks certification to provide to Ohio customers. Avion Energy will continue to provide the Public Utilities Commission of Ohio ("PUCO") information as required by the PUCO regarding Avion Energy's activities in Ohio. Avion Energy will continue to comply with all Ohio rules and regulations.

Avion Energy respectfully requests that the Commission extend the current certificate through January 23, 2014 or such timeframe as to allow adequate time for processing of its renewal application.

Respectfully submitted on behalf of,
AVION ENERGY GROUP, LLC



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Summary: Motion electronically filed by Teresa Orahod on behalf of Dylan Borchers