

**BEFORE THE  
PUBLIC UTILITIES COMMISSION OF OHIO**

In The Matter of the Application	)	Case No 14-0428-EL-GAG
of City of Toronto for Certification	)	
As a Governmental Aggregator	)	Case No 12-0514-EL-GAG

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**MOTION FOR EXTENSION OF CERTIFICATE EXPIRATION DATE AND  
MEMORANDUM IN SUPPORT**

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**I. MOTION FOR EXTENSION**

Now comes FirstEnergy Solutions Corp. (“FES”) on behalf of the City of Toronto (“the City”) and moves that the Public Utilities Commission of Ohio (“Commission”) grant an extension of the expiration date of its certificate to provide governmental aggregation services granted by the Commission under Case No. 12-0514-EL-GAG. FES is the current supplier for the City’s governmental aggregation program. FES routinely assists governmental aggregation communities it serves, like the City, with making their required renewal filings to the PUCO. Due to the timing of the City’s meeting, the only opportunity for renewal applications to be formally reviewed and signed, FES was unable to obtain signatures for the renewal application from the City prior to February 3, 2014. As a result of this timing problem a complete renewal application was not submitted within the 30–60 day advance window set forth in rule 4901:1-24-09 of the Ohio Administrative Code (“OAC”). Given that the time for the renewal has passed, the City has filed an application for a new certificate concurrent with this motion, and the City seeks an extension of its current certificate’s expiration during the pendency of the Commission’s considering review of the City’s new certificate application.

## **II. MEMORANDUM IN SUPPORT**

The City was granted the authority to provide governmental aggregation services and without extension its current certificate will have expired on March 4, 2014. Due the City's meeting schedule, where renewal applications would be reviewed and signed, the application could not be reviewed in a timely manner. The City has filed a new application concurrent with this motion. While the Commission considers the new application, the City requests an extension of the expiration date of its certificate from March 4, 2014, to April 17, 2014 to allow for the thirty day Commission review period from the March 17, 2014 date of new certificate application.

The City's request for an extension is reasonable under the circumstances and should be granted. If the Commission does not grant this request to extend its certificate under Case No. 12-0514-EL-GAG, the City's ability to legally provide aggregation services would be in question, this would put the City's aggregation participants at a disadvantage in that they may not be able to receive the lower electric rates they currently enjoy since they would potentially be forced back to higher priced SSO service. Although a renewal application was not filed within the 30-60 day window as set forth in Rule 4901:1-24-09 (A), in substance there have been no material changes in the City's operation of its aggregation program as is clear from its new certificate application. The City has done nothing that would warrant suspension or rescission of its authority. An extension would allow the City to obtain a new certificate under this case number (14-0428-EL-GAG) without causing undue hardship or inconvenience to its participants. The City respectfully submits that an extension of its certificate expiration date under Case No. 12-0514-EL-GAG is in the public interest.

Wherefore, FirstEnergy Solutions Corp on behalf of the City of Toronto respectfully urges the Commission to grant the extension.

Respectfully submitted,

/s/ Jacob A. McDermott

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Summary: Motion For Extension electronically filed by Mr. Jacob A McDermott on behalf of FirstEnergy Solutions Corp.