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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the Application of)
Good Energy Consulting Services, LP)
for a Certificate to Provide Competitive)
Retail Electric Service in Ohio)

~~Case No. 12-1752-EL-AGG~~

Case No. 14-1350-EL-AGG

MOTION FOR EXTENSION AND REQUEST FOR EXPEDITED RULING

Pursuant to Rules 4901-1-12(C) and (F) and 4901-1-13 of the Ohio Administrative Code, Good Energy Consulting Services, LP ("Good Energy") seeks an extension of Certificate No. 12-532E(1) which was issued in Case No. 12-1752-EL-AGG. The expiration date of Certificate No. 12-532E(1) was July 7, 2014. Due to a misunderstanding of the required renewal date and the time it took to prepare the financial exhibits, the applicant was not able to file its renewal application on time. It will file a new application on August 6, 2014. Good Energy respectfully requests that the attorney examiner or the Commission extend Certificate No. 12-532E(1) from July 8, 2014 until September 5, 2014 or until the date that the new certificate is issued. Further, the applicant respectfully requests that during the pendency of the new application certification review, it be permitted to continue to operate in Ohio so that there will be no interruption in service to customers.

WHEREFORE, Good Energy Consulting Services, LP respectfully requests that the Commission or its attorney examiner issue an expedited ruling extending Certificate No. 12-532E(1) to September 5, 2014 or until a new certificate is issued and authorize it to continue to operate during the pendency of the new application certification review, so that there will be no interruption in service to customers.

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Respectfully submitted,

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**MEMORANDUM IN SUPPORT OF
MOTION FOR EXTENSION**

Due to a misunderstanding of the required renewal dates in Ohio and due to the time it took to prepare the financial exhibits, Good Energy did not meet the June 7, 2014 filing date for its Renewal Application in Case No. 12-1752-EL-AGG. Good Energy sincerely apologizes for the delay and ensures the Commission that it will timely file renewal applications in the future. Good Energy emphasizes its desire to continue to serve customers in Ohio and hopes the Commission will take this commitment into account when making its decision on the motion for extension. Good Energy requests that an expedited ruling be issued on this motion pursuant to Rule 4901-1-12(C) and (F) of the OAC, considering that its current certificate expired on July 7, 2014. Because Good Energy is the only party to this proceeding, an expedited ruling will not adversely affect the substantive right of any party. Good Energy also respectfully requests that it be authorized to continue to operate in Ohio during the pendency of the new certification application review process so that service to existing customers will not be interrupted.

The Commission has plenary authority to extend the expiration date of Good Energy's certification for good cause shown. Good Energy's delay in filing its Renewal Application was due to its misunderstanding of the required renewal application dates and due to the time it took to prepare the financial statements. Good Energy respectfully requests an extension of the expiration date of Certificate No. 12-532E(1) issued in Case No. 12-1752-EL-AGG to September 5, 2014 and authorization from the Commission to continue to operate in Ohio from July 8, 2014 through September 5, 2014 or until such time as a new certificate is issued so as not to interrupt service to customers.

Respectfully submitted,

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