

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

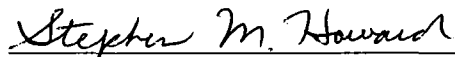
In the Matter of the Application of)	
Achieve Energy Solutions, LLC)	Case No. 12-2416-EL-AGG
for a Certificate to Provide Competitive)	
Retail Electric Service in Ohio)	

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, Achieve Energy Solutions, LLC ("Achieve") seeks an extension of Certificate No. 12-568E(1) which was issued in Case No. 12-2416-EL-AGG. The expiration date of Certificate No. 12-568E(1) is October 1, 2014. Due to a misunderstanding of the required renewal date and the return of its Renewal Application by the U.S. Post Office for using the wrong address, the applicant was not able to file its Renewal Application on time. It has now filed its Renewal Application on September 12, 2014. Achieve respectfully requests that the attorney examiner or the Commission extend Certificate No. 12-568E(1) from October 1, 2014 until October 12, 2014 or until the date that the new certificate is issued.

WHEREFORE, Achieve Energy Solutions, LLC respectfully requests that the Commission or its attorney examiner issue an expedited ruling extending Certificate No. 12-568E(1) to October 12, 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.

Respectfully submitted,



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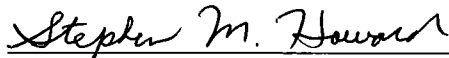
Attorneys for Achieve Energy Solutions, LLC

**MEMORANDUM IN SUPPORT OF
MOTION FOR EXTENSION**

Due to a misunderstanding of the required renewal dates in Ohio and the return of the Renewal Application by the U.S. Post Office for using the wrong address, Achieve did not meet the September 1, 2014 filing date for its Renewal Application in Case No. 12-2416-EL-AGG. Achieve sincerely apologizes for the delay and ensures the Commission that it will timely file renewal applications in the future. Achieve 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. Achieve 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 will expire on October 1, 2014. Because Achieve is the only party to this proceeding, an expedited ruling will not adversely affect the substantive right of any party.

The Commission has plenary authority to extend the expiration date of Achieve's certification for good cause shown. Achieve's delay in filing its Renewal Application was due to its misunderstanding of the required renewal application dates and its use of the wrong mailing address. Achieve respectfully requests an extension of the expiration date of Certificate No. 12-568E(1) issued in Case No. 12-2416-EL-AGG to October 12, 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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Case No(s). 12-2416-EL-AGG

Summary: Motion electronically filed by Mr. Stephen M Howard on behalf of Achieve Energy Solutions, LLC