BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the Application of Choose Energy, Inc. for a Certificate to Provide Competitive Retail Electric Service in Ohio

Case No. 12-2696-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, Choose Energy, Inc. ("Choose") seeks an extension of Certificate No. 12-588E(1) which was issued in Case No. 12-2696-EL-AGG. The expiration date of Certificate No. 12-588E(1) is November 9, 2014. Due to a misunderstanding of the required renewal date, the applicant was not able to file its renewal application on time. It has now filed its renewal application on October 16, 2014. Choose respectfully requests that the attorney examiner or the Commission extend Certificate No. 12-588E(1) from November 9, 2014 until November 15, 2014 or until the date that the new certificate is issued.

WHEREFORE, Choose Energy, Inc. respectfully requests that the Commission or its attorney examiner issue an expedited ruling extending Certificate No. 12-588E(1) to November 15, 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,

Stephen M Howard

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Attorneys for Choose Energy, Inc.

MEMORANDUM IN SUPPORT OF MOTION FOR EXTENSION

Due to a misunderstanding of the required renewal dates in Ohio, Choose did not meet the October 10, 2014 filing date for its Renewal Application in Case No. 12-2696-EL-AGG. Choose sincerely apologizes for the delay and ensures the Commission that it will timely file renewal applications in the future. Choose 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. Choose 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 November 9, 2014. Because Choose 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 Choose's certification for good cause shown. Choose's delay in filing its Renewal Application was due to its misunderstanding of the required renewal application dates. Choose respectfully requests an extension of the expiration date of Certificate No. 12-588E(1) issued in Case No. 12-2696-EL-AGG to November 15, 2014 or until such time as a new certificate is issued so as not to interrupt service to customers.

Respectfully submitted,

Stephin M. Howard

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Summary: Motion Motion for Extension and Request for Expedited Ruling electronically filed by Mr. Stephen M Howard on behalf of Choose Energy, Inc.