## BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of	)	
Progressive Energy Group, LLC for a	)	Case No. 14-2291-EL-AGG
Certificate to Provide Competitive	)	Case No. 12-2916-EL-AGG
Retail Electric Service in Ohio	)	

## **MOTION FOR EXTENSION**

Pursuant to recently effective Rule 4901:1-24-04 of the Ohio Administrative Code, Progressive Energy Group, LLC ("PEG") seeks an extension of Certificate No. 12-609E(1) which was issued in Case No. 12-2916-EL-AGG. The expiration date of Certificate No. 12-609E(1) was December 6, 2014. Due to a misunderstanding of the required renewal date, PEG was not able to file its renewal application prior to the expiration date of its certificate. It has now filed a new application on December 19, 2014 which is less than sixty days after the December 6, 2014 expiration date. PEG respectfully requests that Certificate No. 12-609E(1) be automatically extended from December 6, 2014 until January 18, 2015 or until the date that the new certificate is issued.

WHEREFORE, Progressive Energy Group, LLC respectfully requests that Certificate No. 12-609E(1) be automatically extended to January 18, 2015 or until a new certificate is issued and authorize it to continue to operate during the pendency of the renewal application certification review, so that there will be no interruption in service to customers.

Respectfully submitted,

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## MEMORANDUM IN SUPPORT OF MOTION FOR EXTENSION

Due to a misunderstanding of the required renewal dates in Ohio, PEG did not meet the November 6, 2014 filing date for its Renewal Application in Case No. 12-2916-EL-AGG. PEG sincerely apologizes for the delay and assures the Commission that it will timely file renewal applications in the future. PEG emphasizes its desire to continue to serve customers in Ohio.

Recently effective Rule 4901:1-24-04 provides that a motion requesting an extension of a certificate will be deemed automatically approved (unless ruled otherwise by the Commission or an Attorney Examiner within three business days), if a new application is filed within sixty days after the expiration date of the certificate. PEG submits that it has met the criteria and respectfully requests an automatic extension of the expiration date of Certificate No. 12-609E(1) issued in Case No. 12-2916-EL-AGG to January 18, 2015 or until such time as a new certificate is issued so as not to interrupt service to customers.

Respectfully submitted,

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Summary: Motion Motion for Extension electronically filed by Mr. Stephen M Howard on behalf of Progressive Energy Group, LLC