BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Harlem) Township for Renewal of Certification as a) Case No. 14-151-EL-GAG Competitive Retail Electric Service Provider) Governmental Provide Aggregation) to Services.

MOTION TO EXTEND CERTIFICATION

In accordance with Ohio Adm. Code 4901:1-24-09(B), Harlem Township files this motion for an extension of Certificate No. 14-784E(1) issued by the Public Utilities Commission of Ohio (Commission), which certified Harlem Township as a competitive retail electric service provider to provide governmental aggregation services effective March 2, 2014. Harlem Township requests that the Commission extend the certificate by 30 days, such that the certificate will continue to be effective for the period of time during which the Commission reviews Harlem Township's forthcoming renewal application. The basis for this motion is set forth in the accompanying memorandum in support.

Respectfully submitted,

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Counsel for Harlem Township

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MEMORANDUM IN SUPPORT

The Commission issued Certificate No. 14-784E(1), which certified Harlem Township as a competitive retail electric service provider to provide governmental aggregation services effective March 2, 2014. By its terms, the certificate will expire on March 2, 2016. Unfortunately, given the unavailability of some township trustees due to illness and travel, a renewal application to extend the effectiveness of the certificate will not be filed within the time period prescribed by Ohio Adm. Code 4901:1-24-09(A). Accordingly, additional time is needed to prepare the renewal application and compile the supporting exhibits.

In order to afford Harlem Township the requisite time to file its renewal application, Harlem Township requests an extension of its Competitive Retail Electric Service Provider Certificate by 30 days to April 1, 2016. Consistent with Commission precedent, Harlem Township requests that the Commission extend the expiration date of the certificate to encompass the entirety of its review of the forthcoming renewal application so that if the renewal application is approved, there will be no break in Harlem Township's certification.¹ An extension will not prejudice any party.

¹ See, e.g., In the Matter of the Application of Community Energy Advisors, LLC for Certification as a Competitive Retail Natural Gas Aggregator/Broker, Case No. 13-2139-GA-AGG, Entry at 2 (December 21, 2015) (extending expiration date of certificate even though the expiration date had passed); In the Matter of the Application of Diversegy, LLC for Certification as a Competitive Retail Natural Gas Aggregator/Broker, Case No. 12-2880-GA-AGG, Entry at 1-2 (November 19, 2014) (extending expiration date of certificate to allow time to prepare renewal application and compile supporting exhibits); In the Matter of the Application of the City of Norwood, Ohio for

For good cause shown, Harlem Township respectfully requests that the Commission grant its motion to extend its certification by 30 days as set forth above.

Respectfully submitted,

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Certification to Provide Natural Gas Governmental Aggregation Service in Ohio, Case No. 10-0390-GA-GAG, Entry at 1 (May 10, 2012) (extending expiration date of certificate even though the expiration date had passed).

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Summary: Motion Motion to Extend Certification electronically filed by Mr. Ryan P. O'Rourke on behalf of Harlem Township