

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Harlem)
Township Trustees (Delaware County, OH)) Case No. 14-161-GA-GAG
for Renewal of its Ohio Natural Gas)
Governmental Aggregator Certificate to)
Provide Governmental Aggregation Services.

MOTION TO EXTEND CERTIFICATION

In accordance with Ohio Adm. Code 4901:1-27-09(B), Harlem Township Trustees (Delaware County, OH) (hereinafter Harlem Township) files this motion for an extension of Certificate No. 14-345G(1) issued by the Public Utilities Commission of Ohio (Commission), which certified Harlem Township as an Ohio natural gas governmental aggregator to provide governmental aggregation services effective March 3, 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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MEMORANDUM IN SUPPORT

The Commission issued Certificate No. 14-345G(1), which certified Harlem Township as an Ohio natural gas governmental aggregator to provide governmental aggregation services effective March 3, 2014. By its terms, the certificate will expire on March 3, 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 4901:1-27-09(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 Ohio Natural Gas Governmental Aggregator Certificate by 30 days to April 4, 2016.¹ 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.² An extension will not prejudice any party.

¹ A 30-day extension from March 3, 2016 falls on April 2, 2016, which is a Saturday. By operation of Ohio Adm. Code 4901-1-07(A), the next operative day becomes April 4, 2016, which is a Monday.

² 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*

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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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 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