## 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 renewal application, which was filed on March 28, 2016, contemporaneous with this motion. 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 was supposed to expire on March 2, 2016; however, on March 1, 2016, Harlem Township filed a motion to extend the expiration date of its certificate while it prepared the renewal application and compiled the supporting exhibits.<sup>1</sup> The extension was requested because of the unavailability of some township trustees due to illness and travel  $^2$ 

In order to continue the effectiveness of Harlem Township's certificate and to provide Staff adequate time to review the renewal application, Harlem Township requests another extension of its Competitive Retail Electric Service Provider Certificate by 30 days from the date of the filing of its March 28, 2016, renewal application, up through and including April 27, 2016. The extension is in accord with Commission precedent and will not prejudice any party.<sup>3</sup>

<sup>&</sup>lt;sup>1</sup> Harlem Township's Motion to Extend Certification at 2 (March 1, 2016).

<sup>&</sup>lt;sup>2</sup> Id.

<sup>&</sup>lt;sup>3</sup> 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 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).

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,

Only

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Summary: Motion Motion for an Extension electronically filed by Mr. Ryan P. O'Rourke on behalf of Harlem Township