# 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.	)	

#### AMENDED 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 so that it will remain effective up through and including at least April 28, 2016 (or such longer time as the Commission deems necessary to perform its review). The basis for this motion is set forth in the accompanying memorandum in support.

<sup>&</sup>lt;sup>1</sup> This Amended Motion to Extend Certification is being filed at the direction of Staff. Through this filing, Harlem Township withdraws the Motion to Extend Certification filed earlier this same day.

### Respectfully submitted,

Kimberly W. Bojko (0069402)

Ryan P. O'Rourke (0082651)

Carpenter Lipps & Leland LLP

280 North High Street, Suite 1300

Columbus, Ohio 43215

Telephone: (614) 365-4100

Bojko@carpenterlipps.com

O'Rourke@carpenterlipps.com

Counsel for Harlem Township

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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 was supposed to expire on March 3, 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>2</sup> The extension was requested because of the unavailability of some township trustees due to illness and travel.<sup>3</sup>

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 Ohio Natural Gas Governmental Aggregator Certificate from the date of the filing of its March 28, 2016 renewal application, up through and including at least April 28, 2016 (or such longer time as the Commission deems necessary to perform its review). The extension is in accord with Commission precedent and will not prejudice any party.<sup>4</sup>

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

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

<sup>&</sup>lt;sup>4</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

For good cause shown, Harlem Township respectfully requests that the Commission grant this amended motion to extend certification so that the certificate will remain effective up through and including at least April 28, 2016 (or such longer time as the Commission deems necessary to perform its review).

Respectfully submitted,

Kimberly W. Bojko (0069402)

Ryan P. O'Rourke (0082651)

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280 North High Street, Suite 1300

Columbus, Ohio 43215

Telephone: (614) 365-4100

Bojko@carpenterlipps.com

O'Rourke@carpenterlipps.com

Counsel for Harlem Township

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