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Phone:	(614)-466-4095	Date:	November 14, 2016
Re:	City of Oregon Case# 02-1910 Motion for Extension	cc:	

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Good Afternoon;

We would like to submit a motion for extension request for City of Oregon. The wrong application was filed for the natural gas renewal and the correct application will be sent overnight to the PUCO, along with the original motion for extension request.

If any additional information is required, please contact me at the numbers listed below.

Thank you for your assistance with this matter.

Have a good day.

Andrea Flowers  
Palmer Energy Company  
Consultant for City of Oregon  
419-539-9180 Office  
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**BEFORE THE  
PUBLIC UTILITIES COMMISSION OF OHIO**

In The Matter of the  
City of Oregon for Renewal Certification  
As a Governmental Aggregator

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)  
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Case No. 02-1910-GA-GAG

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**MOTION FOR EXTENSION OF CERTIFICATE EXPIRATION DATE AND  
MEMORANDUM IN SUPPORT**

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**I. MOTION FOR EXTENSION**

Now comes the City of Oregon ("Oregon") and moves that the Public Utilities Commission of Ohio ("Commission") grant an extension of the November 16, 2016, expiration date of its certificate to provide governmental aggregation services. Inadvertently, Oregon filed electric aggregation renewal paperwork rather than natural gas aggregation renewal paperwork for renewal of Certificate 02-033G (7). The incorrect paperwork was filed within the appropriate day advance window set forth in rule 4901:1-27-09 of the Ohio Administrative Code ("OAC"). Oregon filed the appropriate renewal application, out of time, on November February 14, 2016, and Oregon seeks an extension of its certificate's expiration date while the Commission is considering the renewal application.

**II. MEMORANDUM IN SUPPORT**

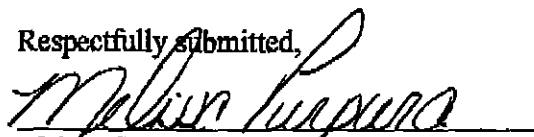
The City of Oregon was granted the authority to provide governmental aggregation services on August 25, 2002, and its current certificate expired on November 16, 2016. Oregon has an existing supplier for the retail natural gas services for its natural gas consumers under its aggregation program. Unfortunately, due to an inadvertent oversight with regard to appropriate

paperwork, Oregon is filing the correct renewal paperwork out of time for the typical process for renewal to occur. Oregon filed its revised renewal application on November 14, 2016. While the Commission considers the renewal, Oregon requests an extension of the expiration date of its certificate from November 16, 2009 to December 15, 2016, to allow for the thirty day review period from the November 14, 2016 renewal application filing date.

Oregon's request for an extension is reasonable under the circumstances and should be granted. If City's does not receive the extension to provide aggregation services, Oregon's natural gas consumers would be at a disadvantage in that they would not be able to receive the natural gas supplies through the aggregation. Although Oregon inadvertently filed incorrect paperwork, it initially filed within the window as set forth in Rule 4901:1-27-09 (A), in substance there have been no material changes in Oregon's operation of its aggregation program. Indeed, expect for the automatic expiration date of its Certificate 02-033G (7), Oregon has done nothing that would warrant suspension or rescission of its authority. Since Oregon's dilemma has been caused by an inadvertent oversight, an extension would allow the City to obtain renewal of its certificate without causing inconvenience to its participating consumers. Indeed, extension of the expiration date is necessary to prevent irreparable harm to Oregon and its aggregation participants, and would prevent disruption in service to these Oregon consumers. The City of Oregon respectfully submits that an extension of its certificate expiration date is in the public interest.

Wherefore, Oregon respectfully urges the Commission to grant the extension.

Respectfully submitted,

  
Melissa Purpura, Law Director  
The City of Oregon