BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

| In the Matter of the | Application | of | Prairie |) | |
|--------------------------------------|--------------------|----|---------|---|-------------------------|
| Township for Cert | ification as | an | Ohio |) | Case No. 15-0170-GA-GAG |
| Natural Gas Governmental Aggregator. | | | |) | |

MOTION TO EXTEND CERTIFICATION

In accordance with Rule 4901:1-27-04, Ohio Adm. Code, Prairie Township hereby files this motion for an extension of Certificate No. 15-417G(1) issued by the Public Utilities Commission of Ohio (Commission) in Case No. 15-0170-GA-GAG, which certified Prairie Township as an Ohio natural gas governmental aggregator to provide governmental aggregation services effective February 26, 2015. Prairie Township respectfully requests that the Commission extend Certificate No. 15-417G(1) so that it will remain in effect for such time as the Commission deems necessary to perform its review of a new application filed in Case No. 17-0695-GA-GAG. A memorandum in support follows.

Respectfully submitted,

/s/ James D. Perko, Jr.
Kimberly W. Bojko (0069402)
James D. Perko, Jr. (0093312)
Carpenter Lipps & Leland LLP
280 Plaza, Suite 1300
280 North High Street
Columbus, Ohio 43215
Telephone: (614) 365-4100
bojko@carpenterlipps.com
perko@carpenterlipps.com

On behalf of Prairie Township

Prairie Township's new application has been filed contemporaneously with this motion.

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

| In the Matter of the Application of Prairie |) | |
|---|---|-------------------------|
| Township for Certification as an Ohio Natural |) | Case No. 15-0170-GA-GAG |
| Gas Governmental Aggregator. | | |

MEMORANDUM IN SUPPORT

The Commission issued Certificate No. 15-417G(1), which certified Prairie Township as an Ohio natural gas governmental aggregator to provide governmental aggregation services effective February 26, 2015. By its terms, the certificate expired on February 26, 2017. Pursuant to Rule 4901:1-27-04, Ohio Adm. Code, Prairie Township filed a new application for certification as a natural gas governmental aggregator on March 9, 2017 in Case No. 17-0695-GA-GAG.

In order to continue the effectiveness of Prairie Township's certificate and to provide adequate time for the Commission to consider the new application, Prairie Township respectfully requests an extension of its certificate. The extension should remain in effect for such time as the Commission deems necessary to perform its review of the new application and avoid any loss of certification. Granting an extension of the certificate under Ohio Adm. Code 4901:1-27-04²

² Pursuant to Rule 4901:1-27-04, Ohio Adm. Code, "[i]f the motion is filed in conformance with rule 4901:1-27-07 of the Administrative Code, it shall be deemed automatically approved unless, within three business days of filing, the commission or an attorney examiner appointed by the commission rules otherwise."

would also be consistent with Commission precedent³ and will not prejudice any party. For the foregoing reasons, the motion should be granted.

Respectfully submitted,

/s/ James D. Perko, Jr.
Kimberly W. Bojko (0069402)
James D. Perko, Jr. (0093312)
Carpenter Lipps & Leland LLP
280 Plaza, Suite 1300
280 North High Street
Columbus, Ohio 43215
Telephone: (614) 365-4100
bojko@carpenterlipps.com
perko@carpenterlipps.com

On behalf of Prairie Township

³ 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 has 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 more time to prepare renewal application and compile supporting exhibits); In the Matter of the Application of EarlyBird Power LLC for Certification as a Competitive Retail Natural Gas Aggregator/Broker, Case No. 14-0005-GA-AGG, Entry at 1-2 (January 21, 2014) (extending expiration date of certificate after it expired to allow time to consider new application).

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

3/9/2017 2:37:53 PM

in

Case No(s). 15-0170-GA-GAG

Summary: Motion Motion To Extend Certification 15-0170-GA-GAG electronically filed by Ms. Cheryl A Smith on behalf of In the matter of the Certification Application Ohio Natural Gas Governmental Aggregators