

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Scioto	)	
Township for Certification as an Ohio	)	Case No. 15-0277-GA-GAG
Natural Gas Governmental Aggregator.	)	

---

**MOTION TO EXTEND CERTIFICATION**

---

In accordance with Rule 4901:1-27-04, Ohio Adm. Code, Scioto Township hereby files this motion for an extension of Certificate No. 15-419G(1) issued by the Public Utilities Commission of Ohio (Commission) in Case No. 15-0277-GA-GAG, which certified Scioto Township as an Ohio natural gas governmental aggregator to provide governmental aggregation services effective March 6, 2015. Scioto Township respectfully requests that the Commission extend Certificate No. 15-419G(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. 17-0788-GA-GAG.<sup>1</sup> A memorandum in support follows.

Respectfully submitted,

/s/ James D. Perko, Jr.  
\_\_\_\_\_  
Kimberly W. Bojko (0069402) (Counsel of Record)  
James D. Perko, Jr. (0093312)  
Carpenter Lipps & Leland LLP  
280 Plaza, Suite 1300  
280 North High Street  
Columbus, Ohio 43215  
(614) 365-4100  
Bojko@carpenterlipps.com  
Perko@carpenterlipps.com  
(willing to accept service by email)

*On Behalf of Scioto Township*

---

<sup>1</sup> Scioto 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 Scioto )  
Township for Certification as an Ohio Natural ) Case No. 15-0277-GA-GAG  
Gas Governmental Aggregator. )

---

**MEMORANDUM IN SUPPORT**

---

The Commission issued Certificate No. 15-419G(1), which certified Scioto Township as an Ohio natural gas governmental aggregator to provide governmental aggregation services effective March 6, 2015. By its terms, the certificate expired on March 6, 2017. Pursuant to Rule 4901:1-27-04, Ohio Adm. Code, Scioto Township filed a new application for certification as a natural gas governmental aggregator on March 17, 2017 in Case No. 17-0788-GA-GAG.

In order to continue the effectiveness of Scioto Township's certificate and to provide adequate time for the Commission to consider the new application, Scioto 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 Rule 4901:1-27-04, Ohio Adm. Code,<sup>2</sup> would also be consistent with Commission precedent<sup>3</sup> and will not prejudice any party.

For the foregoing reasons, the motion should be granted.

---

<sup>2</sup> 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."

<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 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).

Respectfully submitted,

/s/ James D. Perko, Jr.

Kimberly W. Bojko (0069402) (Counsel of Record)

James D. Perko, Jr. (0093312)

Carpenter Lipps & Leland LLP

280 Plaza, Suite 1300

280 North High Street

Columbus, Ohio 43215

(614) 365-4100

Bojko@carpenterlipps.com

Perko@carpenterlipps.com

(willing to accept service by email)

*On Behalf of Scioto Township*

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**3/20/2017 2:54:01 PM**

**in**

**Case No(s). 15-0277-GA-GAG**

Summary: Motion Motion to Extend Certification and Memorandum in Support electronically filed by Ms. Cheryl A Smith on behalf of Scioto Township