BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Canaan) Township as a Governmental Aggregator of) Electricity

Case No. 13-2387-EL-GAG

MOTION FOR EXTENSION OF THE CERTIFICATE

)

Canaan Township, by and through its authorized agent Dynegy Energy Services (East), LLC under O.A.C. § 4901:1-21-16(G), respectfully requests that the Commission extend Canaan Township's governmental aggregation certificate, 14-769E(2), pursuant to O.A.C. § 4901:1-27-09(B), for the reasons set forth in the attached Memorandum in Support, pending the renewal of its certification as requested in the renewal application filed contemporaneously with this motion.

January 16, 2018

Respectfully submitted,

<u>/s Kendall C. Kash</u> Kendall C. Kash (0093717) kkash@bakerlaw.com **BAKER & HOSTETLER LLP** 127 Public Square, Suite 2000 Cleveland, Ohio 44114 Phone: 216-861-7834 Fax: 216-696-0740

Counsel for Dynegy Energy Services (East), LLC, as authorized agent for Canaan Township

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Canaan) Township as a Governmental Aggregator of) Electricity

Case No. 13-2387-EL-GAG

MEMORANDUM IN SUPPORT OF MOTION FOR EXTENSION OF THE CERTIFICATE

)

Canaan Township is a governmental aggregator certified by the Commission since January 16, 2014 to provide governmental aggregation services. Canaan Township's current certificate (14-769E(2)) expires on January 16, 2018. Pursuant to O.A.C. § 4901:1-27-09(B), Canaan Township seeks an extension of the current certificate pending renewal of the certificate by the Commission.

An extension of the certificate is warranted in this case. Due to the intervening holidays, communications with Canaan Township regarding the renewal application were irregular. However, Canaan Township's renewal application is being filed today in conjunction with this motion. This motion for extension is not made for purposes of delay. Instead, the applicant seeks to fully comply with all of the Commission rules and certification requirements.

Wherefore, Canaan Township respectfully requests that the Commission extend the current certificate (14-769E(2)) until such time that the Commission can consider the renewal application being filed today.

January 16, 2018

Respectfully submitted,

/s Kendall C. Kash_

Kendall C. Kash (0093717) kkash@bakerlaw.com BAKER & HOSTETLER LLP 127 Public Square, Suite 2000 Cleveland, Ohio 44114 Phone: 216-861-7834 Fax: 216-696-0740

Counsel for Dynegy Energy Services (East), LLC, as authorized agent for Canaan Township

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

1/16/2018 3:00:51 PM

in

Case No(s). 13-2387-EL-GAG

Summary: Motion for Extension of the Governmental Aggregator Certificate of Canaan Township electronically filed by Kendall C Kash on behalf of Dynegy Energy Services (East), LLC