

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Renewal Application)
of Extricity, LLC for Certification as a) Case No. 16-345-EL-AGG
Competitive Retail Electric Service)
Aggregator/Power Broker)

MOTION OF EXTRICITI, LLC TO EXTEND CERTIFICATION EXPIRATION DATE

Extricity, LLC respectfully moves the Public Utilities Commission of Ohio, pursuant to Ohio Administrative Code 4901:1-24-09(B), for an extension of the expiration date of its Certificate Number 16-1059E(1). A Memorandum in Support of this Motion is attached hereto.

Respectfully submitted,



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MEMORANDUM IN SUPPORT

Extricity, LLC ("Extricity") hereby requests an extension of its Certificate No. 16-1059E(1), pursuant to Admin. Code 4901:1-24-09(B). Extricity's certificate became effective on March 18, 2016 and expires on March 18, 2018.

Rule 4901:1-24-09(B) states:

Any renewal application filed fewer than thirty calendar days prior to the expiration date indicated on the certificate, but no later than the expiration date on the certificate, shall be filed with a motion requesting an extension of the certificate. If the motion is filed in conformance with rule 4901:1-24-07 or 4901:1-24-13 of the Administrative Code, it shall be deemed automatically approved unless, within three business days of its filing, the commission or an attorney examiner appointed by the commission rules otherwise.

Extricity is filing its Renewal Application simultaneously with this Motion, which filing date is fewer than thirty calendar days prior to the stated expiration date on its Certificate of March 18, 2018, but not later than said extension date. Hence, Extricity respectfully requests an extension of its Certificate No. 16-1059E(1) in accordance with Rule 4901:1-24-09(B).

Respectfully submitted,



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**In the Matter of the Renewal Application)
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as a Competitive Retail Electric Service)
Power Broker/Aggregator)**

Case No. 16-345-EL-AGG

MOTION FOR PROTECTIVE ORDER

Extricity, LLC ("Extricity") respectfully moves the Public Utilities Commission of Ohio, pursuant to 4901:1-24-07 and 4901:1-24-08 of the Ohio Administrative Code, for a protective order to keep two financial exhibits (Exhibit C-3 and C-5) submitted as part of its application to renew its certificate as a competitive retail electric service power broker/aggregator confidential and not part of the public record. The reasons underlying this motion are detailed in the attached Memorandum in Support.

Respectfully submitted,



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MEMORANDUM IN SUPPORT

Extricity is not a publicly traded company and, accordingly, its financial information is not publicly available. Therefore, as set forth in greater detail below, Extricity requests that the information it designated as confidential in its Renewal Certification Application to provide power broker services filed February 28, 2018, specifically Exhibits C-3 and C-5, be protected from public disclosure. The information for which protection is sought covers financial statements (C-3) and forecasted financial statements (C-5). Such information if released to the public would harm Extricity by providing its competitors proprietary information in what is designated by statute to now be a competitive service.

Rule 4901:1-24-08 (A) states "An applicant may file financial statements, financial arrangements, and forecasted financial statements under seal. If these exhibits are filed under seal, they will be afforded protective treatment for a period of six years from the date of the certificate for which the information is being provided."

Pursuant to the above, Extricity respectfully requests such applicable financial statements, namely Exhibits C-3 and C-5, be maintained under seal and afforded protective treatment for the promulgated six year period.

Respectfully submitted,



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