

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

<b>In the Matter of the Application of</b>	)	
<b>Reliable Power Alternatives Corp.</b>	)	<b>Case No. 16-2272-EL-AGG</b>
<b>for Certification as a Competitive</b>	)	
<b>Electric Broker/Aggregator.</b>	)	

---

**MOTION FOR EXTENSION**

---

Pursuant to Ohio Administrative Code Rule 4901:1-24-04), Reliable Power Alternatives Corp., (“RPAC”) seeks an extension of Certificate 17-1219E (1), which was issued in Case No. 16-2272-EL-AGG with an expiration date of April 26, 2019. Due to personnel changes, RPAC was not able to file its renewal application prior to the expiration date of its certificate. RPAC has been in contact with Staff and is already putting together a new Application for Certification which it will file as soon as possible. In support of the application, RPAC respectfully requests that Certificate No. 17-1219E (1) be automatically extended from April 26, 2019 until the date that the new certificate is issued.

WHEREFORE, RPAC respectfully requests that Certificate No. 17-1219E (1) be automatically extended until a new certificate is issued and that the Commission authorize it to continue to operate during the pendency of the application certification review

*[Signature block on the next page.]*

Respectfully submitted,

/s/ Robert Dove

Robert Dove (0092019)

Kegler Brown Hill + Ritter Co., L.P.A.

65 E State St., Ste. 1800

Columbus, OH 43215-4295

Office: (614) 462-5443

Fax: (614) 464-2634

[rdove@keglerbrown.com](mailto:rdove@keglerbrown.com)

**Attorney for the Reliable Power  
Alternatives Corp.**

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

<b>In the Matter of the Application of</b>	)	
<b>Reliable Power Alternatives Corp.</b>	)	<b>Case No. 16-2272-EL-AGG</b>
<b>for Certification as a Competitive</b>	)	
<b>Electric Broker/Aggregator.</b>	)	

---

**MEMORANDUM IN SUPPORT OF  
MOTION FOR EXTENSION**

---

Due to a change in company personnel, RPAC did not meet the April 26, 2019, or March 26, 2019, filing date deadlines for its Renewal Application in Case No. 16-2272-EL-AGG. RPAC sincerely apologizes for the delay and emphasizes its desire to continue to serve customers in Ohio. An Application for Certification will be filed as soon as possible. RPAC is filing this motion pursuant to O.A.C. 4901:1-24-04 to request that Certificate 17-1219E (1) be automatically extended during the pendency of the new application review.

Ohio Administrative Code Rule 4901:1-24-04 provides that a motion requesting an extension of a certificate will be deemed automatically approved if filed in conformance with 4901:1-24-07 or 4901:1-24-13 unless ruled otherwise by the Commission or an Attorney Examiner within three business days. RPAC submits that it has met the criteria and respectfully requests an automatic extension of the expiration date of Certificate No. 17-1219E (1) issued in Case No. 16-2272-EL-AGG until such time as a new certificate is issued.

*[Signature block on the next page]*

Respectfully submitted,

/s/ Robert Dove

Robert Dove (0092019)

Kegler Brown Hill + Ritter Co., L.P.A.

65 E State St., Ste. 1800

Columbus, OH 43215-4295

Office: (614) 462-5443

Fax: (614) 464-2634

[rdove@keglerbrown.com](mailto:rdove@keglerbrown.com)

**Attorney for the Reliable Power  
Alternatives Corp.**

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

**Commission of Ohio Docketing Information System on**

**5/24/2019 2:56:08 PM**

**in**

**Case No(s). 16-2272-EL-AGG**

Summary: Motion for an Extension electronically filed by Mr. Robert Dove on behalf of Reliable Power Alternative Corp.