BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Renewal Application of Taylor Energy Partners, LLC for Certification As A Competitive Retail Electric Provider To Provide Aggregation And Power Services Case No. 17-1312-EL-AGG

MOTION OF TAYLOR ENERGY PARTNERS, LLC FOR EXTENSION OF ITS CERTIFICATE

Taylor Energy Partners, LLC hereby moves pursuant to Ohio Administrative

Code 4901:1-24-04 for extension of its Certificate Number 17-1237(E)(1) during the

pendency of its new application. A Memorandum in Support of this Motion is attached hereto.

Respectfully Submitted,

<u>/s/William M. Irvine</u> William M. Irvine (0098130) Mallory Law Office, LLC 720 East Broad Street, Suite 202 Columbus, Ohio 43215 (614) 440-1440 ext 106 Fax: (614) 288-2953 william.irvine@mallorylawoffice.com Counsel For Applicant Taylor Energy Partners, LLC

MEMORANDUM IN SUPPORT

Taylor Energy Partners, LLC ("Taylor Energy") hereby requests an extension of its Certificate Number 17-1237(E)(1), pursuant to Admin. Code 4901:1-24-04, during the pendency of its new application for certification. Taylor Energy's certificate became effective on June 23, 2017 and expired on June 23, 2019.

Rule 4901: 1-24-04 provides in pertinent part:

Any CRES provider or governmental aggregator that fails to file an application for certification renewal pursuant to rule 4901:1-24-09 of the Administrative Code prior to the expiration date on the certificate must file a new application for certification in a new case and may request, no later than sixty days after the expiration date on the certificate, to extend its previous certificate during the pendency of the new application review

Under Admin. Code 4901:1-24-04, Taylor Energy's Renewal Application was

not filed prior to the expiration date of the certificate due to administrative error. Taylor

Energy will file a new Certificate Application and requests the existing certificate be

extended until the renewal application is approved.

For all the foregoing reasons, Taylor Energy Partners, LLC respectfully requests that its Certificate Number 14-771(E)(2) be automatically extended as permitted in Rule 4901:1-24-04

Respectfully Submitted,

<u>/s/ William M. Irvine</u> William M. Irvine (0098130) Mallory Law Office, LLC 720 East Broad Street, Suite 202 Columbus, Ohio 43215 (614) 440-1440 ext 106

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Case No(s). 17-1312-EL-AGG

Summary: Motion Motion for Extension Of Certificate electronically filed by Mr. William M Irvine on behalf of Taylor Energy Partners, LLC