

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of World Fuel)
Services, Inc. for Certification as a Competitive) Case No. 17-1516-GA-CRS
Retail Natural Gas Marketer)

**WORLD FUEL SERVICES, INC.
MOTION FOR EXTENSION OF CERTIFICATE EXPIRATION DATE**

Pursuant to Ohio Administrative Code (“O.A.C.”) Rule 4901:1-27-07(A), World Fuel Energy Services, Inc. (“World Fuel”) respectfully requests that the date for the expiration of its current certification as a Competitive Retail Natural Gas Marketer be extended until September 3, 2019 or until a new certificate is granted. The reasons supporting this motion are contained in the attached Memorandum in Support.

Respectfully submitted on behalf of,
WORLD FUEL SERVICES, INC.



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MEMORANDUM IN SUPPORT

World Fuel Services, Inc. (“World Fuel”) respectfully requests that the effectiveness of its Retail Natural Gas Marketer Certificate Number 17-614G(1) be extended until September 3, 2019 or until a new certificate is granted. Ohio Administrative Code (“O.A.C.”) Rule 4901:1-27-09(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 4901:1-27-07 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.

World Fuel’s renewal application was received and docketed by the Public Utilities Commission of Ohio (“Commission” or “PUCO”) on July 1, 2019 as required by O.A.C. Rule 4901:1-27-09(A)¹. World Fuel’s current certificate expired on July 27, 2019, and the PUCO has 30 days to review the application for renewal which was filed on July 1, 2019, an extension is necessary to ensure the continuity of certification.

Commission precedent supports extension of World Fuel’s certificate. See, *In the Matter of the Application of Summit Energy Services*, Case No. 13-1175-GA-AGG, Entry, (November 7,

¹O.A.C. 4901:1-27-09(A) No less than thirty and no more than sixty days prior to the expiration date indicated on the retail natural gas supplier's or governmental aggregator's certificate, the retail natural gas supplier or governmental aggregator shall file an application with the commission for certification renewal on forms provided by the commission.

2017) (where the Commission granted applicant's motion for extension of expiration date, although the expiration had already passed 132 days); and *In the Matter of the Application of the City of Norwood*, Case No. 10-390-GA-GAG, Entry, (May 10, 2012) (where the Commission granted applicant's motion for extension of expiration date, although the expiration had already passed). Granting World Fuel's request for extension of certification expiration date until its certificate is renewed or a new certificate is issued will allow World Fuel to continue providing its services and avoid the administrative and operational issues that would occur if its certification is cancelled.

World Fuel submits that suspension or rescission of its certificate is unwarranted. There have been no material or adverse changes in World Fuel's financial or operational status or its ability to provide the services it seeks certification to provide to Ohio customers. Further, this is World Fuel's first request for extension of its certificate. See *Summit Energy Services*, Case No. 13-1175-GA-GAG, Entry ¶5 (November 7, 2017) (where the Commission considered whether it was Summit's first motion for extension of certificate). World Fuel will continue to provide the Commission information as required by the PUCO regarding World Fuel's activities in Ohio, and World Fuel will continue to comply with all Ohio rules and regulations.

World Fuel respectfully requests that the Commission extend the current certificate through September 3, 2019 or such timeframe as to allow adequate time for processing of its renewal application.

Respectfully submitted on behalf of,
WORLD FUEL SERVICES, INC.



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Summary: Motion of World Fuel Services, Inc. for Extension of Certification Expiration Date electronically filed by Teresa Orahoud on behalf of Dylan F. Borchers