

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of North)	
American Power and Gas, LLC for a)	Case No. 12-1134-GA-CRS
Certificate to Provide Competitive Retail)	
Natural Gas Service in Ohio)	

MOTION FOR EXTENSION OF CERTIFICATE

Pursuant to Ohio Administrative Code Rule 4901:1-27-04, North American Power and Gas, LLC (“NAP&G”) seeks an extension of Certificate No. 12-249G(4), which was issued in Case No. 12-1134-GA-CRS. The expiration date of Certificate No. 12-249G(4) was August 29, 2020. Due to disruptions caused by the COVID-19 pandemic and a change in regulatory personnel, NAP&G did not file its renewal application before the expiration of its Ohio natural gas certificate. In conjunction with this motion, NAP&G is preparing its renewal application through the PUCO Community (the Commission’s recently launched on-line process) and will be filing it soon. NAP&G respectfully requests that Certificate No. 12-249G(4) be extended from August 29, 2020, until the date that the renewal certificate is issued.

WHEREFORE, NAP&G respectfully requests that Certificate No. 12-249G(4) be extended from August 29, 2020, until a renewal certificate is issued, and NAP&G be authorized to continue to operate during the pendency of the renewal application certification review.

Respectfully submitted,

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Counsel for North American Power and Gas, LLC

**MEMORANDUM IN SUPPORT OF
MOTION FOR EXTENSION OF CERTIFICATE**

North American Power and Gas, LLC did not meet the date for its renewal application in Case No. 12-1134-GA-CRS and its Ohio natural gas certificate has expired because of interruptions caused by the COVID-19 pandemic and a change in regulatory personnel. NAP&G apologizes for this delay. NAP&G is preparing its renewal application and utilizing the Commission's newly launched on-line process for its preparation and submittal for filing.

Ohio Administrative Code Rule 4901:1-27-04 provides that a supplier may request an extension of a previous certificate and such a motion requesting an extension of a previous certificate will be deemed automatically approved (unless ruled otherwise by the Commission or an Attorney Examiner within three business days), if a renewal application is filed fewer than 60 calendar days after the expiration date of the certificate. NAP&G submits that it will meet this criteria. Additionally, NAP&G requests that the certificate be extended in accordance with the Commission's June 3, 2020 decision¹ to allow an extension of a previous certificate for up to 90 days while the renewal application is reviewed.

NAP&G requests an extension of Certificate No. 12-249G(4) issued in Case No. 12-1134-GA-CRS from August 29, 2020, until such time as a renewal certificate is issued.

Respectfully submitted,

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¹ *In the Matter of the Commission's Consideration of a New Electronic Certification Processing System for Providers of Competitive Retail Electric Service and Competitive Retail Natural Gas Service and the Waiver of Applicable Procedural Rules Contained in Ohio Adm.Code Chapters 4901:1-24 and 4901:1-27*, Case No. 20-1077-GE-WVR, Entry at ¶ 6(a) (June 3, 2020).

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

9/4/2020 9:42:44 AM

in

Case No(s). 12-1134-GA-CRS

Summary: Motion Motion for Extension of Certificate electronically filed by Mrs. Gretchen L. Petrucci on behalf of North American Power and Gas, LLC