

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Engie)	
Insight Services Inc. for Certification to)	
Provide Aggregation and Power Broker)	Case No. 11-1923-EL-AGG
Services within Ohio.)	

**MOTION FOR EXTENSION OF CERTIFICATE EXPIRATION DATE BY
ENGIE INSIGHT SERVICES INC.**

Pursuant to Ohio Administrative Code (“O.A.C.”) Rule 4901:1-24-4 and *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 (June 3, 2020), Engie Insight Services Inc. (“Engie”) respectfully requests the date for the expiration of its current certification be extended 90 days while its renewal application is being reviewed. The reasons supporting this motion are contained in the Memorandum in Support attached hereto and incorporated herein.

Respectfully submitted on behalf of,
ENGIE INSIGHT SERVICES INC.



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MEMORANDUM IN SUPPORT

Engie Insight Services Inc. (“Engie”) respectfully requests that the effectiveness of its Competitive Retail Electric Service Provider Certificate Number 11-352E(5) be extended 90 days as set forth 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 (June 3, 2020) (“Entry”) at ¶6(a):

CRES/CRNGS provider may request, no later than 60 days after the expiration date on the certificate, to extend its previous certificate for up to 90 days while the new application is reviewed

Due to an administrative oversight, Engie delayed the filing of its application for renewal of its certificate as O.A.C. 4901:1-24-09(A) would otherwise require. As Engie’s current certificate expired on June 1, 2021, and the Public Utilities Commission of Ohio (“Commission” or “PUCO”) has 30 days to review the application for renewal, an extension is necessary to ensure the continuity of certification. Engie is a private and independently owned energy services company that provides aggregation and power broker services within the State of Ohio.

It is reasonable for the Commission to extend Engie's certification. See, *In the Matter of the Application of Summit Energy Services*, Case No. 13-1175-GA-AGG, Entry, (November 7, 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 Engie's request for extension of certification by 90 days or until its certificate is renewed will allow Engie to continue to provide its services and avoid the administrative upheaval that could occur if its certification is cancelled.

Engie submits that there is no reason or circumstance that warrants suspension or rescission of its certificate. There have been no material or adverse changes in its financial or operational status or its ability to provide the services it seeks certification to provide to Ohio customers. Engie will continue to provide the Commission information as required by the PUCO regarding Engie's activities in Ohio, and Engie will continue to comply with all Ohio rules and regulations.

Therefore, Engie respectfully requests that the Commission extend the current certificate for 90 days.

Respectfully submitted on behalf of,
ENGIE INSIGHT SERVICES INC.



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Case No(s). 11-1923-EL-AGG

Summary: Motion for Extension of Certificate Expiration Date by Engie Insight Services Inc.
and Memorandum in Support electronically filed by Teresa Orahoad on behalf of Devin D.
Parram