

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Southeast)	
Ohio Public Energy Council d/b/a Sustainable)	
Ohio Public Energy Council for Certification)	Case No. 14-936.EL-GAG
to Governmental Aggregation Services within)	
Ohio.)	

**MOTION FOR EXTENSION OF CERTIFICATE EXPIRATION DATE BY
SOUTHEAST OHIO PUBLIC ENERGY COUNCIL D/B/A SUSTAINABLE OHIO
PUBLIC ENERGY COUNCIL**

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), Southeast Ohio Public Energy Council d/b/a Sustainable Ohio Public Energy Council¹ (“SOPEC”) respectfully requests the Public Utilities Commission of Ohio (“Commission” or “PUCO”) to extend the expiration date of the certificate expiration date by 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.

¹ On April 26, 2021, SOPEC filed a notice of fictitious names use which explained that SOPEC will do business as “Sustainable Ohio Public Energy Council” as a governmental aggregator in Ohio. SOPEC has registered the fictitious name “Sustainable Ohio Public Energy Council” with the Ohio Secretary of State. SOPEC’s legal name continues to be “Southeast Ohio Public Energy Council.”

Respectfully submitted on behalf of,
SUSTAINABLE OHIO PUBLIC ENERGY COUNCIL



Devin D. Parram (0082507)
BRICKER & ECKLER LLP
100 South Third Street
Columbus, OH 43215
Telephone: (614) 227-8813
Facsimile: (614) 227-2390
E-Mail: dparram@bricker.com

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Southeast)	
Ohio Public Energy Council d/b/a Sustainable)	
Ohio Public Energy Council for Certification)	Case No. 14-936.EL-GAG
to Governmental Aggregation Services within)	
Ohio.)	

MEMORANDUM IN SUPPORT

SOPEC respectfully requests that the effectiveness of its Competitive Retail Electric Service Provider Certificate Number 014-826E be extended 90 days in accordance with *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), which states:

[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, SOPEC’s current certificate expired on June 22, 2022 without the filing of a renewal application. Concurrent with the filing of this motion, SOPEC is submitting its renewal application. Because SOPEC’s certificate has expired, an extension is necessary to ensure the continuity of certification and to allow the Commission adequate time to review the application.

It is reasonable for the Commission to extend SOPEC’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 SOPEC's request for extension of certification by 90 days or until its certificate is renewed will allow SOPEC to continue to provide its governmental aggregation services and avoid the administrative upheaval that could occur if its certificate is cancelled.

SOPEC submits that there is no reason or circumstance that warrants suspension, rescission, or cancelation 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. SOPEC will continue to provide the requisite information as required by the PUCO regarding SOPEC's activities in Ohio, and SOPEC will continue to comply with all Ohio rules and regulations.

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

Respectfully submitted on behalf of,
SUSTAINABLE OHIO PUBLIC ENERGY COUNCIL



Devin D. Parram (0082507)
BRICKER & ECKLER LLP
100 South Third Street
Columbus, OH 43215
Telephone: (614) 227-8813
Facsimile: (614) 227-2390
E-Mail: dparram@bricker.com

**This foregoing document was electronically filed with the Public Utilities
Commission of Ohio Docketing Information System on**

7/15/2022 3:51:58 PM

in

Case No(s). 14-0936-EL-GAG

Summary: Motion for Extension of Certificate Expiration Date by Southeast Ohio
Public Energy Council d/b/a Sustainable Ohio Public Energy Council electronically
filed by Teresa Orahod on behalf of Devin D. Parram