

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Warren    )  
Township for Certification as an Ohio Natural    ) Case No. 17-1910-GA-GAG  
Gas Governmental Aggregator.                    )

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**MOTION FOR EXTENSION OF CERTIFICATE EXPIRATION DATE**

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On behalf of Warren Township, Belmont County (Warren), Trebel, LLC (Trebel) hereby files this motion for an extension of the expiration date of Certificate No. 17-622G issued by the Public Utilities Commission of Ohio (Commission) in Case No. 17-1910-GA-GAG, which certified Warren as an Ohio competitive retail natural gas governmental aggregator to provide governmental aggregation services effective October 6, 2021. Warren respectfully requests that the Commission extend Certificate No. 17-622G so that it will remain in effect for up to ninety days while the Commission performs its review of a renewal application filed in Case No. 17-1910-GA-GAG.

Trebel routinely assists the governmental aggregation communities it serves, like Warren, with making their required renewal filings to the Commission. However, due to a technical error that resulted in Trebel not being listed as a filer for Warren in the Commission's portal, Trebel was unable to complete and submit a renewal application for Warren within the time period set forth in Ohio Adm.Code 4901:1-27-09.

Warren, therefore, seeks an extension of its current certificate during the pendency of the Commission's review of Warren's renewal application, which was submitted concurrently with this motion.

Respectfully submitted,

/s/ Kimberly W. Bojko

Kimberly W. Bojko (0069402) (Counsel of Record)

Emma Y. Easley (0102144)

Carpenter Lipps LLP

280 North High Street, Suite 1300

Columbus, Ohio 43215

Telephone: (614) 365-4124

[bojko@carpenterlipps.com](mailto:bojko@carpenterlipps.com)

[easley@carpenterlipps.com](mailto:easley@carpenterlipps.com)

(willing to accept service by email)

*Counsel for Trebel, LLC*

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**MEMORANDUM IN SUPPORT**

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The Commission issued Certificate No. 17-622G, which certified Warren to provide competitive retail natural gas governmental aggregator services within the State of Ohio, effective October 6, 2021. By its terms, the certificate is set to expire on October 6, 2023. Due to a technical error that caused Trebel to not be listed as a filer for Warren in the Commission’s portal, Trebel was unable to complete and timely file a renewal application within the time period set forth in Ohio Adm.Code 4901:1-27-09. In accordance with Ohio Adm.Code 4901:1-27-04 and the Commission’s June 3, 2020 Entry in Case No. 20-1077-GE-WVR,<sup>1</sup> Trebel is requesting this extension and is also submitting Warren’s renewal application for certification as a natural gas governmental aggregator in Case No. 17-1910-GA-GAG.

In order to continue the effectiveness of Warren’s certificate and to provide adequate time for the Commission to consider the renewal application, Warren respectfully requests an extension of its certificate. Warren’s request for an extension is reasonable under the circumstances, and the extension should remain in effect for such time as the Commission deems necessary to perform its review of the renewal application and avoid any loss of certification. The requested extension would allow Warren to obtain a renewed certificate without causing undue hardship or

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<sup>1</sup> *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 (June 3, 2020).

inconvenience to Warren and will allow its residents to achieve the benefits of an aggregation program. Granting an extension of the certificate under Ohio Adm.Code 4901:1-27-04<sup>2</sup> would also be consistent with Commission precedent,<sup>3</sup> and will not prejudice any party.

For the foregoing reasons, Trebel on behalf of Warren respectfully urges the Commission to grant the extension of its certificate, pending review of its renewal application.

Respectfully submitted,

/s/ Kimberly W. Bojko

Kimberly W. Bojko (0069402) (Counsel of Record)

Emma Y. Easley (0102144)

Carpenter Lipps LLP

280 North High Street, Suite 1300

Columbus, Ohio 43215

Telephone: (614) 365-4124

[bojko@carpenterlipps.com](mailto:bojko@carpenterlipps.com)

[easley@carpenterlipps.com](mailto:easley@carpenterlipps.com)

(willing to accept service by email)

*Counsel for Trebel, LLC*

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<sup>2</sup> Pursuant to Rule 4901:1-27-09(B), Ohio Adm. Code, “[i]f 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.”

<sup>3</sup> See e.g., *In the Matter of the Application of Community Energy Advisors, LLC for Certification as a Competitive Retail Natural Gas Aggregator/Broker*, Case No. 13-2139-GA-AGG, Entry at 2 (December 21, 2015) (extending expiration date of certificate even though the expiration date has passed); *In the Matter of the Application of the City of Norwood, Ohio for Certification to Provide Natural Gas Governmental Aggregation Service in Ohio*, Case No. 10-0390-GA-GAG, Entry at 1 (May 10, 2012) (extending expiration date of certificate even though the expiration date had passed).

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

**10/5/2023 12:46:14 PM**

**in**

**Case No(s). 17-1910-GA-GAG**

Summary: Motion Motion for Extension of Certificate Expiration Date Warren  
Township (17-1910-GA-GAG) electronically filed by Mrs. Kimberly W. Bojko on  
behalf of Trebel LLC.