

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of City of)
Ashland for Certification as an Ohio Natural) Case No. 17-2498-GA-GAG
Gas Governmental Aggregator.)

MOTION FOR EXTENSION OF CERTIFICATE EXPIRATION DATE

On behalf of the City of Ashland, Ashland County (Ashland), Trebel, LLC (Trebel) hereby files this motion for an extension of the expiration date of Certificate 18-636G issued by the Public Utilities Commission of Ohio (Commission) in Case No. 17-2498-GA-GAG, which certified Ashland as an Ohio competitive retail natural gas governmental aggregator to provide governmental aggregation services effective January 13, 2022. Ashland respectfully requests that the Commission extend Certificate No. 18-636G 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. 17-2498-GA-GAG.

Trebel routinely assists the governmental aggregation communities it serves, like Ashland, with making their required renewal filings to the Commission. However, due to the timing of Ashland's city council meeting, Trebel was unable to obtain the necessary affidavit signature for Ashland's renewal application. Consequently, Trebel was unable to complete and submit a renewal application for Ashland within the time period set forth in Ohio Adm.Code 4901:1-27-09.

Ashland, therefore, seeks an extension of its current certificate during the pendency of the Commission's review of Ashland'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

easley@carpenterlipps.com

(willing to accept service by email)

Counsel for Trebel, LLC

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MEMORANDUM IN SUPPORT

The Commission issued Certificate No. 18-636G, which certified Ashland to provide competitive retail natural gas governmental aggregator services within the State of Ohio, effective January 13, 2022. By its terms, the certificate is set to expire on January 13, 2024. Due to the timing of the city council meeting, Trebel was unable to acquire a signed affidavit 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 4901:1-27-09, Trebel is requesting this extension and is also submitting Ashland's renewal application for certification as a natural gas governmental aggregator in Case No. 17-2498-GA-GAG.

In order to continue the effectiveness of Ashland's certificate and to provide adequate time for the Commission to consider the renewal application, Ashland respectfully requests an extension of its certificate. Ashland'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 Ashland to obtain a renewal certificate without causing undue hardship or inconvenience to Ashland and will allow its residents to achieve the benefits of an

aggregation program. Granting an extension of the certificate under Ohio Adm.Code 4901:1-27-09¹ would also be consistent with Commission precedent,² and will not prejudice any party.

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

Respectfully submitted,

/s/ Kimberly W. Bojko

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Columbus, Ohio 43215

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Counsel for Trebel, LLC

¹ 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.”

² 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).

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Case No(s). 17-2498-GA-GAG

Summary: Motion Motion for Extension of Certificate Expiration Date City of
Ashland (17-2498-GA-GAG) electronically filed by Mrs. Kimberly W. Bojko on
behalf of Trebel LLC.