## BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the Application of Chrisylynn Energy Services, Inc., for Certification as a Competitive Retail Natural Gas Broker.

Case No. 14-0101-GA-AGG

#### **MOTION FOR EXTENSION**

Pursuant to Ohio Administrative Code Rule 4901:1-27-09(B) and 4901:1-27-07, Chrislynn Energy Services, Inc., ("Chrislynn") seeks an extension of Certificate 14-343G (4), which was issued in Case No. 14-0101-GA-AGG with an expiration date of March 14, 2024. Due to issues related to having the financial statements and forecasted financial statements prepared, Chrislynn was not able to file its renewal application within the sixty to thirty days prior to expiration date of its certificate. Chrislynn is filing this instant Motion to request extension of its current certificate pursuant to Ohio Adm. Code 4901:1-27-09(B) to ensure that its certificate does not lapse while the Commission reviews its renewal certificate that has been filed contemporaneously with this Motion. This Motion is being filed prior to the March 14, 2024 expiration date of Chrislynn's certificate.

Chrislynn respectfully requests that Certificate No. 14-343G (4) be automatically extended from February 16, 2022, until the date that the new certificate is issued in Case No. 14-0101-GA-AGG, pursuant to Ohio Adm. Code 4901:1-27-09(B).

Respectfully submitted,

/s/ Robert Dove

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Attorney for the Chrislynn Energy Services, Inc.

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Case No. 14-0101-GA-AGG

## MEMORANDUM IN SUPPORT OF MOTION FOR EXTENSION

In February of 2024 Chrislynn commissioned the creation of the financial statements and forecasted financial statements from its accountant, due to some technical issues related to email systems there were delays in information being shared that each party thought had been sent and or received. As a result, Chrislynn, did not receive the completed financial statements and forecasted financial statements until after the 30 days prior to its certificate expiration. Chrislynn sincerely apologizes for the delay and emphasizes its desire to continue to serve customers in Ohio. Chrislynn is filing this motion pursuant to O.A.C. 4901:1-27-09(B) to request that Certificate 14-343G (4) be automatically extended during the pendency of the application review in Case No. 14-0101-GA-AGG so that Chrislynn can continue serving its customers.

Ohio Administrative Code Rule 4901:1-27-09(B) provides that a motion requesting an extension of a certificate will be deemed automatically approved if filed in conformance with 4901:1-27-07 unless ruled otherwise by the Commission or an Attorney Examiner within three business days. Chrislynn submits that it has met the criteria and respectfully requests an automatic extension of the expiration date of Certificate No. 14-343G (4) issued in Case No. 14-0101-GA-AGG until such time as a new certificate is issued in Case No. 14-0101-GA-AGG.

[Signature block on the next page]

Respectfully submitted,

/s/ Robert Dove Robert Dove (0092019) Kegler Brown Hill + Ritter Co., L.P.A. 65 E State St., Ste. 1800 Columbus, OH 43215-4295 Office: (614) 462-5443 Fax: (614) 464-2634 rdove@keglerbrown.com

Attorney for the Chrislynn Energy Services, Inc.

## **CERTIFICATE OF SERVICE**

I certify that this *Motion for an Extension* was filed electronically through the Docketing Information System of the Public Utilities Commission of Ohio on March 13, 2024. The PUCO's e-filing system will electronically serve notice of the filing of this document on the parties subscribed to these proceedings.

> /s/ Robert Dove Robert Dove

## This foregoing document was electronically filed with the Public Utilities

## Commission of Ohio Docketing Information System on

3/13/2024 11:56:25 AM

in

# Case No(s). 14-0101-GA-AGG

Summary: Motion for an Extension electronically filed by Mr. Robert Dove on behalf of Chrislynn Energy Services, Inc. .